

Dear Sir/Madan,

I am writing in response to the consultation to the Mattishall Neighbourhood Plan Review consultation, in particular on Policy MNP ENV4: Open and Local Green Space which recommends a piece of land that we own, 'Site 4: Rayner's Way/Dereham Road.'

Firstly, we must state that we, the landowners, are 100% opposed to this designation. We have written to the Parish Council several times and to BDC through various online consultations to voice our opinions. Despite this, the Local Green Space Site Assessments for the Local Plan May 2024 states that the "owner is not aware of the application". It appears that even from a very early stage, our voices have been completely ignored and that an unconnected, unfair, autocratic process is being applied.

This Green Space proposal is totally against our wishes; in fact, we feel this is borderline criminal - to just 'claim' a piece of private land 'for the local community' with no direct consultation or conversation with us, the landowners. We purchased the land in 2011 along with what used to be known as Rayners Barn, and it originally formed part of our front garden as lawn. Is it now Breckland's planning policy to go about claiming people's front gardens for the benefit of passers-by?

In 2022, we submitted application 3PL/2022/0143/O, which sought to develop the land. The application was refused and dismissed at appeal, but we are still actively working towards a fresh application by gathering more detailed flood risk and modelling information. We are currently working with a local, small scale, quality developer with a view to submitting a detailed full planning application in future for a quality, sympathetic, small development of 2 or 3 dwellings which will be in keeping with the rural character of the village. We firmly believe that, in this case, the Local Green Space Policy is being used as a weapon against development by an active minority, rather than for a legitimate purpose. In fact, Mattishall Neighbourhood Plan's Open Spaces Assessment, clearly evidences that our site does not score highly in importance to the local community, which I will discuss in the points below.

In our opinion, our land does not meet ANY of the required criteria set out in Paragraph 106 of the NPPF which make it demonstrably special to the local community under the following categories:

Beauty

This is the smallest site by far of all the sites proposed in Mattishall. The land is a rectangle of grass, less than an acre in size. It is flanked by native hedging and trees. The hedging was replanted by us roughly 6 years ago and it is still growing. The hedge is now almost tall enough to screen the land entirely from view, which was the reason for planting it in the first place, to offer more privacy in our garden. Only a hedge is now visible to people passing from most angles. It therefore cannot be argued that the land contributes to character or sense of place as only a hedge is visible. The land does not make an important contribution to the physical form and layout of the village and it does not link to any other open space or allow views to anything of significance. The hedge is not under threat, even if the land were to be developed in future, the hedge would still remain and would be managed.

According to [Mattishall Neighbourhood's Plan Open Spaces Assessment document](#), only 66% of community respondents stated that the "Beauty" of the site was important.

This compares to:

77% for site 1

59% for site 2 (it's already designated a community space)

80% for site 3

77% for site 5

83% for site 7

80% for site 8

86% for site 9

Historic significance

It has none.

Recreational value

It has none, there is no PRow and we will never allow public access onto the land. It cannot be accessed from any public path. The only current access is off a private drive that we do not control.

Tranquillity

The land is adjacent to the main road through Mattishall which is not tranquil at most times during the day. The traffic on Dereham Road can be large and heavy at times.

According to Mattishall Neighbourhood's Plan Open Spaces Assessment document, only 60% of respondents felt it was an important "Tranquil" site - the lowest percentage of all the sites.

This compares to:

72% for site 1

70% for site 2

77% for site 5

84% for site 7

84% for site 8

85% for site 9

Richness of wildlife

In 2021 and 2022, ecology surveys were carried out on the land as part of planning application 3PL/2022/143/O. They concluded that, "No bats were confirmed as roosting during the surveys" and that "eDNA water sample analysis of two ponds located near to the site has been completed, which has confirmed GCN absence." Therefore, 'no impact on bats or great crested newts'. The MNP Open Spaces Assessment therefore incorrectly states that it is a roosting site for Pipistrelle bats and does not present any evidence to support this statement. It also does not provide any statistics on the importance of wildlife from respondents, so we do not know the results, if there were any. There are 3 (not 5 as stated) TPO designated trees on one boundary which are quite impressive. They are not under threat and are not subject to any plans to be removed so LGS designation will make no difference.

The Parish Council describes the land as a 'wild meadow'. It is not. It is simply an overgrown lawn that used to form part of our garden. The grass has since been cut as immediate neighbours complained that it looked scruffy. We will continue to cut and maintain it as such in future.

Alternative Sites

- What has happened to Site 9, Land South and West of Ivy Way? It now no longer features in the LGS Site Assessment at all, yet this was submitted in the Mattishall Neighbourhood Plan Assessment. Why is this? This site has genuine and significant local value, due to its regular recreational use, wildlife ponds and public footpath. It also has significant historical value. It is an important part of a much-used circular walking route used by dozens of residents daily. Survey respondents scored it highly on ALL criteria, more than any other;
Beauty: 86%
Historic Significance: Earthworks and possible connection to the Harlestone Family
Tranquillity: 84%
Richness in wildlife: 87%
Why therefore was this site not included? Out of all the sites in the Open Spaces Assessment, it is truly the worthiest of Local Green Space designation.
- In addition, Site 1: Dereham Road/Howes Lane (LPR/C4S/GS/069) scores 77% for "Beauty", 72% for "Tranquillity", and 80% for "Richness in Wildlife". Yet, this site has been recommended not to be considered for LGS allocation in the LGS Site Assessment, and it is stated that the tranquillity does not appear to be special to residents, despite having a higher score than ours! It also forms part of the valued Views and Vistas in the Mattishall Neighbourhood Plan of which 92% of residents stated as important to them.
- Sites 7 and 8: respectively Land South and North of Norwich Road reinforce the rural character of the village and provide it with a valuable gateway vista when arriving from the east. These fields have already been identified by the residents as being important views and vistas and protected as designated agricultural open space. We feel that this is important that this remains the case.
- Mattishall already has, quite rightly and fairly, designated Green Spaces in the form of Mattishall Primary School playing fields, and another site, which was negotiated from the outset with developers at the junction of Dereham Road and Old Hall Road as community orchards/woodland, allotments and play area. Both do and will serve the community very well.
- The village has a cricket club and golf course which provide additional recreational benefit.

Any of the above would be much more valuable to the community and appropriate as green spaces than our comparatively small piece of lawn.

Conclusion

Paragraph 106 of the NPPF states that:

106. The Local Green Space designation should only be used where the green space is:

- (a) in reasonably close proximity to the community it serves;
- (b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- (c) local in character and is not an extensive tract of land.

Clearly, from the survey results, it is evidenced that our land is not demonstrably special to the local community in terms of the required criteria, and that other sites come up much more favourably. We can only assume that LGS designation is being used as a weapon against development on this location which we are actively still engaged in.

We cannot understand what logical rationale has been applied in the LGS Site Assessments document dated May 2024 which concludes that our land should be considered for LGS designation. Some of the facts regarding wildlife significance are incorrect (bats, newts, TPO's), and other sites which are demonstrably more special to the local community have not been recommended or even included. It therefore cannot be argued this process is fair, scientific, democratic, or based on recorded evidence.

