GUIDE - HOW TO USE THIS DOCUMENT

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| This document is assessment / audit specific to the GNLP nomination of GNLP0379 as Preferred Site, consideration of Reasonable Alternative Sites and overall objections/points to be considered regarding Lingwood and its suitability for housing growth.  I have allocated all observations a Reference Number between 1 – 43, (totals 25 pages including this cover sheet and Key.) The Source document, where stated is allocated a date. All references are generally presented in an attempted chronological order and/or follow the Site Assessment Site Methodology as appropriate, some repetition of cited documents unfortunately occur, however they are referenced specifically to additional Objection / observations which are embedded within the Site Assessment procedure.  The blending of Policy with Process has presented some challenges to delineate these 2 elements. Therefore these 2 ‘strands’ are colour coded as given below in order to help identify specific points raised and, in some instances; having slightly more gravitas in terms of importance.   |  | | --- | | **POLICY - YELLOW** |  |  | | --- | | **PROCESS - GREY** |   &  Respectively.  The ‘none’ highlighted References are also to be considered when looking at this document in the whole as they pertain to the lodged Objections /Observations accordingly and complement the overall evaluation and objection to GNLP Lingwood Site Proposals. ***Text written in red*** is used to identify further relevant points and/or draw attention and/or emphasis accordingly.  The following 2 Pages list my Objections to GNLP 0379 being nominated as Preferred Site and are drawn from the Table detailed below. I support GNLP 0380 to be reconsidered as the Preferred Site within the Lingwood Cluster and is detailed accordingly.  Additional abbreviations used.  SAB – Site Assessment Booklet  SRS – Safe Route to School  ST – Stage of Site Assessment Procedure |

SUMMARY OF OBJECTIONS

I object to the nomination of Preferred Site GNLP 0379 for development for the following reasons: -

* Nonadherence to the correct declared procedures stated within the methodology in assessing a Site for housing development
* The apparent disconnect between the approval for housing on the Old School Site and its omission from all elements of GNLP assessing Lingwood’s future housing requirements.
* Significant inconsistencies and flaws within the Site Assessment process
* The use of out of date data (HELLA, SA/SEA), HELLA Matrix categories not being apparently considered in relation to outcomes and no change management process to prevent this occurring.
* The Merit of the nomination is discordant with National and Local Planning Guidelines including not being compliant with NPPF Policy 1-5.
* Assessments (Safety, Road infrastructure and access to/from the Village) have not been considered at all regarding Lingwood’s overall suitability to sustain extra housing demands.
* THE GNDB Policy of increasing school capacity (ratio 28.3 per 100 houses), 60 plus houses is arbitrary and does not consider local constraints such as limited local infrastructure etc.
* The divergence from LCA National and Local Planning Guidelines specific to the loss of valuable intrinsic Landscapes affecting the setting of St. Peters Church and its consequent impact on the setting of the Listed Building amounts to significant heritage harm. The overall loss of the strategic gap within which are located Listed Buildings and their setting will be lost in perpetuity.
* The location of Millennium Green and its proximity to the preferred site presents clear road safety issues to which any road widening with ‘mitigation’ measures cannot be as effective as the existing road safety layout in terms of Road Safety for both pedestrians and road users alike.
* The acknowledged loss by Highways to remove “a lot of mature trees on the frontage would need to be moved” is totally contrary to the stated aims of “landscape enhancement policies”. Some of these ‘mature trees’ are veteran Oak trees with TPO’s and to maintain the status quo is best practice. The loss of these and other trees, including hedgerows is completely at odds with any potential net ‘gain’ regarding any environmental mitigation being adopted.
* The loss of Highly Valuable ALC 1 land
* Site unsuitability in terms of significant flooding / pooling issues with RofSW also being a factor to adjacent land and roads.
* The ‘last minute’ Preferred Site proposal is not in accordance with the transparent Stage process for Site evaluation and evidence indicates ‘tight timeline’s’ in order to submit a revised Site Proposal, its larger area, increased number of houses and the vague description on what mitigation actions would negate such a development prior to the GNLP submission date.
* Conflict of interests in that NPS, as part of NCC is promoting this for development upon behalf of the NCC whose representatives are members of the GNLP Team, who are the arbiters and promoters of this Site; therefore, having have a clear vested interest as NCC are the recipients of Capital Receipts from the sale of land and development
* The discounting of Reasonable Alternative Sites given at Stage 7 is based upon the already stated flawed process, the incorrect use of out of date data to substantiate the nomination of GNLP0379 as the better Site option. Therefore, Reasonable Alternative Sites are worthy of due reconsideration to be one of the Preferred Sites within the Lingwood Village Cluster.

**SUPPORT**

**GNLP0380 AS PREFERRED SITE**

The preferred allocation of site GNLP0379 is in conflict with National and Local Planning Policy and Guidelines including not being compliant with NPPF para 32. GNLP0380 Reasonable Alternative Site has a lesser environmental impact, lesser impact regarding infrastructure requirements and lesser LCA landscape impact in terms of loss of Intrinsic Landscape Value. It is not in close proximity to any Grade One Listed Building and has a negligible negative impact on Grade 2 Listed buildings already separated from GNLP0380 Site by existing developments. The location is best suited to being at the entry point to the village and therefore reduces the number of both residents and service vehicles transiting through the village. Closer proximity to Shops and services and the SRS is comparatively the same as GNLP0379 Site. Based on an assessment of merits site GNDLP0380 is a more sustainable alternative and should be preferred.

I therefore support GNLP 0380 as the Preferred Site for development.

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| Ref. | Date –if known | Source Doc | Specific  Reference | | Document / Process | Objections / Comments / Discrepancies / Notes | |
| 1. | 08.01-22.03.18 | 1st Regulation 18 Consultation GNLP Site Proposals Document | Page 65  Section 3.25  Lingwood and Burlingham | | Assessment of sites received between 16.05-31.07.17  GNLP0379 (1ha), is recorded as being north of the Village. | Subsequent GNLP0379 SA/SEA/HELAA (Jan 2020*) states it is located in the centre of the village. This is a contradiction and is factually incorrect of the referenced statement.* | |
| 2 | 08.01-22.03.18 | 1st Regulation 18 Consultation GNLP Site Proposals Document | Page 65  Section 3.25  Lingwood and Burlingham | | “To conclude, if Lingwood is identified for development, GNLP0380 and GNLP0296 could produce sustainable housing development with appropriate mitigation. If more growth is needed in Lingwood, GNLP0379 and the western part of GNLP0067 may also be acceptable for housing”. | GNLP0379 is tertiary (third option). Later is adopted and promoted as Preferred Site over and above GNLP0380 and GNLP0296. This is not carried forward into the GNLP SA/SEA. | |
| 3 | 12. 2017  &  2019.02 | GNLP HELAA  NPPF  2.8.(c) | Para.126-141  ENV2 | | GNLP0379 placed North of Village. Initial highway evidence suitable access could be achieved with mitigation. Agricultural Classes 1&2  **No impact on designated landscapes** | ENV 2 (current at stated time) Landscape Character Assessment documents specifically not referred to***. No assessment of the Intrinsic Landscape Character value of Lingwood Church setting in terms of this Proposal and is omitted by NPS (Development Promoter).*** | |
| 4 | 2009 onwards | Various Proposals  By Promoter Details | NPS  Promoter  For  Development | | **NPS Property Consultants Limited (NPS)**  **The parent company for the NPS Group. NPS Property Consultants Limited is responsible for delivering property maintenance and consultancy services to the sole shareholder Norfolk County Council,** as well as other public and private sector customers in the East of England | ***Conflict of interest as NPS represents NCC in the promotion of land owned by the NCC for the development.* The GNLP Board are required in law to provide land for development and therefore the GNLP Team members including Education Dept, Highways, BDC are both the Arbiters’ and promoters of the entire process with a clear vested interest.** | |
| **5**. | (NPPF) 2019  Mar 2012 | 1.2 National Planning Policy Framework (NPPF) | ALC  Planning  Considerations  4.1 Grade 1 - excellent quality agricultural land Para 170. (a) & (b)  Para .112 | | LPAs should make decisions that contribute to and enhance the natural and local environment by: **protecting landscapes, geology, and soils, considering the economic and other benefits of BMV agricultural and, and try to use areas of poorer quality land instead of higher quality land** preventing soil, air, water, or noise pollution, or land instability from new and existing development | Protecting landscapes (**see Ref. No.3**)  No differentiation or subsequent impact regarding the loss of ALC Grade 1 re GNLP0379 assessed against the other Lingwood and Burlingham Site proposals catagorised as having only ALC Grade 2 soils***. Not referenced in documentation.*** | |
| Ref. | Date –if known | Source Document | Specific Reference | | Document / Process | Objections / Comments / Discrepancies / Notes | |
| 6. | Jan 2020 | SA/SEA of the  GNLP | B.29 - Matrix | | Cluster Matrix denotes GNLP0379 original Area and housing numbers proposed. | Specifically, GNLP03279 states 1.17 ha and approx. 27 dwellings. Not the revised hectares and housing stated at Stage 7 of the assessment process. ***GNLP data is not current and is flawed*** | |
| 7. | Jan 2020 | SA/SEA of the GNLP | B.29 – Matrix/Table | | Cluster Matrix denotes GNLP0380 ***(--)*** Category 10 - Education | Matrix denoting GNLP0380 Point 10 ***(--) assessment is*** not diverging significantly when in comparison to GNLP0379 which is assessed more favourably ***(-). E***videnced based assessment gives same number of roads to cross re. SRS | |
| 8. | Jan 2020 | SA/SEA of the GNLP | B.29.1.2 | | Air Pollution GNLP 0379 & 0380 are proposed for development between 10-99 | This larger number of dwellings are not referenced nor stated anywhere else within this SA/SEA Para B.29 document. | |
| 9. | Jan 2020 | SA/SEA of the GNLP | SA Objective 2  B.2.29  &    Matrix | | Air pollution - SitesGNLP0379 and GNLP0380 are proposed for the development of between 10 & 99 dwellings. Therefore, the proposed development at these *two sites could potentially have a minor negative impact* on air pollution in the local area. Site GNLP0296 is proposed for the development of approximately 110 dwellings. The proposed development at this site could potentially result in a *significant increase in local air pollution; therefore, a major negative impact would be expected.* | Site proposals for GNLP0379 & 0380 are assessed co-located within this assessment = 10 – 99 dwellings (Variable metric), however assuming 99 dwellings planned is 11 dwellings less than Site GNLP0296.  The Impact/Site assessment for GNLP 0379/0380 are referenced together, therefore are relatively equivalent in the number of proposed houses as per GNLP 0296. ***SA must consider this so therefore leading to a differing assessment***. De facto both proposals could potentially result in a *significant increase in local air pollution; therefore, a major*  *(--) negative impact would be expected for both.* | |
| 10. | Jan 2020 | SA/SEA of the GNLP | SA Objective 4 Landscape  B.29.4.2  B.29.4.2 | | Landscape Character Sites GNLP0296, GNLPSL0006, GNLP2071 and GNLP0277 are located within the LCA ‘Freethorpe Plateau Farmland’. Sites GNLP0379 and GNLP0380 are located within the LCA ‘Blofield Tributary Farmland’ | Site GNLP0379 and GNLP 0380 sites are on the boundary of the existing Lingwood settlement boundary and located within the designated Biofield Landscape Character area Blofield D4) they both share a common shared southern boundary re LCA of the Freethorpe Plateau. Farmland Landscape Character Type C2. Given specifically the new and incorrectly assessed larger GNLP0379 proposed site is south of Lingwood St Peters Church the primary visual character outlook is *orientated South to North*. Therefore, when considering Landscape Planning Guidelines both LCA apply equally and are not mutually exclusive to one another | |
| Ref. | Date –if known | Source Document | Specific Reference | | Document / Process | Objections / Comments / Discrepancies / Notes | |
| 11. | Jan 2020  Feb 2019  Feb 2019  27.03.12  &  02.2019  Dec 2017 | SA/SEA of the GNLP  LCA BDC Part 2 of 5  LCA DBC Part  3 of 5  NPPF  Historic  England  The setting of Heritage Assets | B.29.4.2  Para 3.7.17  C. 2  Para. 3.6.23  -  Para. 3.6.28  Sect 15  Para. 170  Indent  (a)  Policy Note 3.  Para 10/11/13 | | Landscape Character – Site description states location in terms of LCA referencing and comprising of large areas of arable land. Summary is a collective assessment without specifics to each Site proposal, specifically GNLP0379 and states “Therefore, the proposed development at these three sites could potentially be discordant with some of these key characteristics and would be expected to have *a* ***minor negative impact on the local landscape character*.”**  Planning policies and decisions should contribute to and enhance the natural and local environment by: (a) ***protecting and enhancing valued landscapes,*** sites of biodiversity or geological value and ***soils*** (in a manner commensurate with their statutory status or identified quality in the development plan);  (b) Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland. | This is assessment is generic and does not specifically consider the LCA Part 3 Feb 2019 Guideline **This collective LCA assessment is discordant with LCA guidelines and as such the assessment of minor negative impact is erroneous and undermines the veracity of this process. Any development planned for GNLP0379 will have significant / major negative impact upon the existing intrinsic landscape value and degrade the associated historical heritage specific to this site. Is not in accordance with BDC LCA policies, namely :-**  **• Seek to conserve subtle features of the historic landscape, including hedgerows and tracks;**  **• Seek to conserve the landscape setting of manor houses, halls and churches;**  **• Seek to maintain key views towards churches, which are often key landscape features;**  **• Seek to conserve the landscape setting of Lingwood;**  **• Seek to ensure new development does not disrupt the smooth, predominantly uninterrupted skyline within the area;**  **• Seek to conserve open views across the farmland.** | |
| Ref. | Date –if known | Source Document | Specific Reference | | Document / Process | Objections / Comments / Discrepancies / Notes | |
| 12. | Jan 2020 | SA/SEA | SA Objective 6  B.29.6.2 | | Local Landscape Designations: All sites in this cluster are located within 600m from open space associated with Lingwood County First School | ***This SA/SEA statement is incorrect. Lingwood and Burlingham B.29 SA/SEA is not current and refers to a School closed in May 2014.*** The new school, Lingwood Primary Academy opened in Sept. 2014 located on Station Road. (Ref B.29.10.1 refers) | |
| 13. | Jan 2020  Jan 2019 | SA/SEA  Towards a Strategy (TaS) Doc  GNDP approved | SA Objective 10 Education  B.29.10.1  B.29.10.2  B.29.10.3  TaS Doc para1.4  Matrix  Education  Section 10 ***(--)*** | | Primary School: Lingwood Primary Academy is located in the east of Lingwood village. Sites GNLP0296 and GNLP0379 are located within the  Target distance to this school (minor positive) impact. GNLP0380 due to being partially located outside the ‘target distance’ to school. (Minor negative), impact.  Secondary School: minor negative impact re all 6 sites.  Summation of B.29. sect.10 –  The proposed development at Sites GNLP0380, GNLPSL0006, GNLP2071 and GNLP0277 would be expected to have a ***major negative (--), impact on site end users’ access to both primary and secondary education.*** | ***This statement is erroneous,*** based upon a summary that the development of GNLP0380 will have ***major negative impact*** on site end users’ access to both primary and secondary education is without any stated Significant Risks or associated qualified statements to substantiate this assessment.  In relation to Lingwood Primary Academy the notional comparative walking distances between site GNLP0379 and 0380 to the School is approx. an extra 200m when considering GNLP0380. All sites to be considered as per TaS Safe Route to School (SRS) policy ≤ 3km.  SRS from both sites would require the same number of roads to be crossed. Both Sites have an identified SRS . | |
| 14. | Jan 2020 | SA/SEA | SA - Objective 13. Historic Environment  B.29.13  B29.13.1 | | Grade I Listed Buildings: Site GNLP0379 is located approximately 290m from the Grade I Listed Building ‘Church of St Peter’. This site is separated from this Listed Building by open fields and as such, the proposed development at this ***site could potentially alter*** the setting of this Listed Building. Therefore, ***a minor negative*** impact on the local historic environment would be expected | B.29 GNLP0379 refers in most instances to an area of 1.17 (ha) / approx. 27 dwellings. This SA Objective is related to the same unrevised Site Proposal as per the Matrix and other SA sections. Therefore SA.13 is not relevant thus undermining this Site Appraisal impact assessment from the outset. Any subsequent larger area of hectares, higher number of dwellings (60 or more) as detailed in the amended Preferred Site Proposal would likely to ***have a major negative*** ***impact*** upon the Historic Environment assessment of the Church of St. Peter. | |
| Ref. | Date –if known | Source Document | Specific  Reference | | Document / Process | Objections / Comments / Discrepancies / Notes | |
| 15. | Jan 2020 | SA/SEA | B.29.13.2 | | Grade II Listed Buildings: Site GNLP0379 is located approximately 30m from the Grade II Listed Building ‘Thatched Cottage’, approximately 130m from ‘Manor Farm east barn and attached buildings to south east and south west’ and ‘Manor Farm west barn and attached buildings to south east and south west’. | the inclusion of Sites GNLPSL0006, GNLP2071 and Given the questionable veracity of the existing B.29.13 Site Assessment GNLP0277 together with GNLP0379 and assessed as having a collective minor negative impact on the local historic environment is not reflecting accurately the differing geographical locations of mentioned Grade II buildings. GNLP0379 SA indicates close proximity to 2 Grade II listed buildings and as such close proximity to stated buildings must be reflected in a separate SA and would give a differing SA evaluation. | |
| 16. | Jan 2020 | SA/SEA | ALC  B.29.14.3  *Table Ref 5*  *Refers* | | ALC: Sites GNLP0296, GNLP0379, GNLP0380, GNLPSL0006 and GNLP2071 are situated either wholly or partially on ALC Grade 2 land. Site GNLP0379 is also situated partially on ALC Grade 1 land. | Not complaint with NPPF guidelines and inferior ALC land from other Proposed Sites place GNLP0379 the least desirable proposal when considering ALC criteria and stated policy. ***Ref 5. Refers*** | |
| 17. | Jan 2020  Jan 2020  Jan 2020  16 Oct 19  Jan 2017 | HELLA SA/SEA  SAB & Map  Consultation Doc  BDC/NCC  Deed of Planning Obligation Sec 106. TCP Act 1990  Lingwood First & Nursery School, Chapel Rd.  Joint Core Strategy Doc – (not current) AMR 2015-2016 | B.29  SAB ST1 - 7  Planning Permission Ref. 20190278  Housing allocation Table P.62 | | “At the base date of the plan there are no carried forward residential allocations but there is a **(a) total of 44 additional dwellings with planning permission on small sites**.”.    2017-2020 – minimum 22 -25(?) dwellings to be built on this site. | **a)** The Permission for 20190278 (School Site), housing development given is not referenced in any HELLA/SA/SEA/ Site Booklet documentation, except denoted on ST7 Map ‘Promoted Sites’ & ‘Reasonable Site GNLP0296 Map as 20140979 coded hatched yellow on Map. **This site is not denoted on Burlingham & Lingwood map no.1 ‘Preferred Site for Housing’ Map - GNLP0379 dated as per the separate comments Booklet.** The SAB Settlement Hierarchy states no carried forward residential allocations, ‘44 dwellings with planning permission on small sites’. No clarity if this figure includes or excludes the 16 Oct 19 approval for School Site development (promoted by NPS), from the overall figure of 44 dwellings**. Opaque number of ‘outstanding’ dwellings allocated as per the GNLP allocation plan for Lingwood. Ref. 6 & 23 Refers** | |
| Ref. | Date –if known | Source Doc | Specific  Reference | Document / Process | | | Objections / Comments / Discrepancies / Notes |
| 18. | Jan 2020 | SEA/SA  Assessment Methodologies and Assumptions | Objective 4  Landscapes Box 2.4  Para 2.13 | “Impacts on landscape will be largely determined by the specific layout and design of development proposals, as well as the site-specific landscape circumstances. **a) Detailed proposals for each development are uncertain at this stage of the assessment. Furthermore, this assessment comprises a desk-based exercise which has not been verified in the field. *Therefore, the nature of the Potential impacts on the landscape are, to an extent, uncertain.*** However, there is a risk of negative effects occurring, some of which may be unavoidable. As  such, this risk has been reflected in the assessment as a negative impact where a development proposal is located in close proximity to sensitive landscape receptors. The level of impact has been assessed based on the nature and value of, and proximity to, the landscape receptor in question. Where a development proposal would not be anticipated to impact a local or  designated landscape, a negligible impact would be expected for this objective.” | | | Specific to GNLP0379 as stated **a).** is non quantifiable and with ***no resilient or robust Site-specific assessments being made. Therefore, the Matrix assessment of minor negative when ranged against other Site proposals within Lingwood is incorrect*** and bears closer scrutiny. Ref. 19 refers. |
| 19. | Current -  Jan  2020  02.2019 | Draft GNLP Local Plan Strategy Policies  NPPF | Policy 1 ref 5  2.8.(c)  3.20 (d) | 5. Landscape The NPPF requires local plans to recognise the intrinsic character and beauty of the countryside. Accordingly, the policy requires development to respect landscape character, based on existing and any future landscape character assessments, and protects locally valued landscapes from inappropriate development. It continues the well-established approach in Greater Norwich of having strong landscape protection policies | | | The GNLP 0379 Preferred Site ***proposal is not compliant with the NPPF requirement and is not in accordance with Policy 1 – 5.*** |

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| 20. | Current -  Jan  2020 | Draft GNLP Local Plan Strategy Policies | *Policy 3*  *Environmental*  *Protection and Enhancement* | Para 180. The strategic approach to heritage is first to consider the potential location of development, for example does *the location itself "fit" well in relation to adjoining settlements, and does it avoid intruding in important views of historic assets?* | GNLP 0379 is located within a Strategic Gap on the Northern Side of the Village with the focal point of the landscape character feature being St. Peters Church. Any such proposed development could not be mitigated without the significant detrimental effect being placed upon this intrinsically historical landscape  ***The Preferred Site proposal GNLP 0379 is totally at odds with Policy 3 and as such is an unsustainable proposal*** |
| 21. | *Current -*  *Jan*  *2020* | *Draft GNLP Local Plan Strategy Policies* | *Policy 3*  *Environmental*  *Protection and Enhancement* | *Para 181. In certain cases element of harm to the historic environment is unavoidable. The policy therefore requires such harm to be minimised. . Where such harm is identified, its level should be weighed against public benefits in decisions making.* | *Given the SA/SEA evidenced base is flawed, the nomination of GNLP0379 as preferred site and the terminology ‘with mitigation’ is irrelevant.* ***There are clear objectively based Site alternatives to be considered and prevent any ‘harm to the historic environment’ occurring.*** |
| 22. | 02. 2019 | NPPF | Open Space and recreation  Para 97 -100 | Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:  a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or  b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; | The strategic gap within which the proposed Site GNLP0379 is located and is not designated Open Space however, on terms of equivalence the criteria in terms of determining this strategic gap as open space is applicable. Namely :  (a) is 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.*** |

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| 23. | Jan 2020 | Site Assessment Booklet( SAB)  &  GNDP Meeting 26.09.19 | Settlement  Hierarchy  Para 5.1-5.3 | The current capacity at Lingwood Primary School is circa 74% and rated as red. This is because forecasts indicate that the spare capacity will be taken up in a few years. Consequently, the scale of housing allocations will be limited to 12-20 dwellings within the cluster. At the base date of the plan there are no carried forward residential allocations but there is a total of 44 additional dwellings with planning permission on small sites (excluding Old school planning permission granted 16/10/19) | Irrespective of the GNDB policy that Village Clusters with Primary Schools can accommodate 50-60+ is not reflected within the Settlement Hierarchy statement that current capacity is 73% as forecasts indicate no capacity in a few years and therefore is limited to 12-20 dwellings. Old school planning permission not included in this statement. The SAB allocation offers no clarity to cope with a variable number of dwellings as determined as per GNDB policy that it may minimise risks of a successful objection***. Ref.17 refers*** |
| 24. | Jan 2020 | SAB | Stage 1 | GNLP0379 - Area 1.10 9ha) approx. 27 dwellings | No amended figures as per Stage 7 of this SAB |
| 25. | Jan 2020 | SAB | Stage 2  HELLA Comparison Table p.4 | Table denoting Amber Colour Coded categories  GNLP0379 – assessed ***9 Amber*** categories  GNLP0380 – ***assessed 7 Amber (6?See - Ref 30)*** GNLP0296 – assessed ***7 Amber*** categories | This HELLA Category comparison table is not referenced nor do the lesser ‘Amber’ categories appear to be considered within the summative ST7 decision of the SAB. Ref.30 , 41 refers |
| 26. | Jan 2020 | SAB | Stage 3(St3)  Summary of consultation documents | GNLP0296 Comments - The development is too large and is in the wrong place. Lack of infrastructure also.  This land is grade 1 agricultural and produces high quality crops. Also, would destroy a healthy country walk and views. Technical issues are addressed. Buckenham Lane can be widened and the site is in access with key services. Loss of openness but it is contained, and the development is in keeping with the village. Comments submitted in support of site. The site is considered suitable for development and additional information has been supplied to support the proposal. Lingwood and Burlingham Parish Council comments Buckenham Lane and Buckenham Road are single track roads and will be unable to take the extra traffic. There is therefore concern for the safety of pedestrians, particularly the old and young. Danger of flooding. Impacts on wildlife. | Development is too large and in the wrong place. No evidenced based references to support this view. This land is Grade 1 agricultural land. This is not correct (ref SA/SEA B.29.14.3) states 0296 is wholly ALC 2 land. Also, would destroy a healthy country walk and views. These comments are non-verifiable qualitative comments without any evidenced references. Technical issues are addressed. L&B PC comments can be mitigated |
| Ref. | Date –if known | Source Doc | Specific  Reference | Document / Process | Objections / Comments / Discrepancies / Notes |
| 27. | Jan 2020 | SAB | St3 GNLP 0379- PC comment | GNLP0379 Site is on the correct side of the village to avoid traffic. | No Traffic Assessment referenced. This comment relates to the smaller site proposal not as per Stage 7 revised site |
| 28. | Jan 2020  Dec 2017  Jan 2020 | SAB  HELAA  Transport and Roads  SA/SEA | Stage 3  Comments  GNLP0380  **Not known**  B.29.12.4 | **a.)** GNLP0380 The development would increase flooding at the front of the site. Entrance would be on a blind bend, worsening the current risk. Landscape setting would be adversely affected, and the site has topographical issues. Blofield Road is a single track. The higher housing density would compare badly to Neve's Close.  **b**) No HELAA referencing Lingwood Road connectivity via Blofield Rd. | **a.)**SA/SEA B.29.2.3 Identifies GNLP0380,0379 and 0296 are equally assessed as low/medium risk of surface flooding.  Landscape setting would be adversely affected. No evidenced based statement to support this comment which is generically applicable to all nominated sites.  **b).**Blofield Rd is a single track road*. Blofield Rd has ‘Passing Places’ and as such is a significant safety factor regarding notified and non-notified incidents occurring between opposite direction vehicles, ‘brave’ cyclists and Pedestrians. No mention in any HELAA/SA/SEA is referenced to Lingwood & road connectivity from the West, specifically Blofield Road* *regarding Lingwood being considered for further growth. Safety Risk Assessment in accessing to/from Lingwood via Blofield Rd appear not to have been conducted and as such is a significant omission regarding Road safety concerns which are binary to when assessing Lingwood as a suitable Cluster Village for more houses.* ***To omit Blofield Rd regarding access to and from Lingwood is a significant failing within the SA/SEA/HELAA process. Ref. 41 refers.*** |
| 29.  29.  Cont. | Jan 2020  Dec 2017  Jan 2020 | SAB  HELLA  SA/SEA | Stage 4 (ST4)  Introduction  +  Lingwood Conclusion  Statement  Discussion of Submitted Sites  B.29.4.5 | “A range of factors have been taken into account to establish whether a site should, or should not, be considered suitable for allocation. ***a)*** Because of capacity constraints at the primary school a limited amount of development of circa 12-20 dwellings is sought.”  These factors include impact on heritage and landscape;  ***b)*** impact on the form and character of the settlement;  ***c***)relationship to services and facilities;  Environmental concerns, including flood risk; and, in particular, a safe walking route to a primary school. Conclusions in regard to a sites performance against the relevant factors have also been informed by the outcomes of the HELAA, as set out under stage 2, consultation responses received, as summarised in stage 3, and other relevant evidence HELLA ,SA,SEA  ***d).*Site GNLP0379 is centrally located in Lingwood** and of a relatively small size (1.1 ha) but sufficient to accommodate the scale of development proposed for the cluster. ***e).***There is a safe route to Lingwood Primary Academy**. f*).*** It is within Agricultural Land Classification Grade 2 and so sequentially preferred to Grade 1 land. There is a surface water flooding risk in the south-west corner of the site which might limit the developable area, and ***g)*** there are views towards St Peter’s church to the north. | ***ST 4 - a).*** *“*Because of capacity constraints at the primary school a limited amount of development of circa 12-20 dwellings is sought.” *All associated conclusions are*  *Related to the original proposed area.*  ***b)*** *Site and does not reference the guidelines as per Landscape Character Value Doc part 3 of 5 specific to Lingwood. Incorrect use of old data derived from HELLA (Dec 2017).*  ***c)*** *Services & Transport and Roads*  *No known available road Safety Risk Assessments specific to Lingwood and Road connectivity from the West via Blofield Rd. See Ref 28 & 41.*  *d). GNLP0379 is North of the Village, outside the settlement boundary Site as per HELAA and other evidenced documents*  ***ST 4. Is relocated: -***  “*GNLP0379 is centrally located in Lingwood and of a relatively small size (1.1 ha) but sufficient to accommodate the scale of development proposed for the cluster.” Specific to original Proposal in terms of size. Incorrect in terms of location.* ***e*).** *SRS – GNLP0379 and 0380. The safety case/ Risk analysis is based upon crossing a railway line via a manned level crossing. Since Jan 2020 an automated level crossing has been installed. The declared SRS within the Site booklet does not reflect this substantial change as it was assessed prior to the new installation of automatic crossings when crossing to and from both Schools and shops, located Southside of the railway line. No revised SRS RA made publicly available to determine what mitigations have been made. This is independent to recent Network Rails’ Pupil briefings and visits to Lingwood Academy Primary School. Network Rail have not planned subsequent visits to reiterate safety awareness regarding automatic controlled level crossings.*  ***f)*** *ALC data is not correct. GNLP0379 is ALC 1 & 2 so* ***is not.*** *Sequentially preferred to other proposed sites only with ALC 2 assessed land as detailed within this SAB. (corrected ST 6)*  ***f).*** *Referenced elsewhere within this Summary Document. However, this Strategic Gap allows uninterrupted Heritage Landscape Character assessed outlook towards St. Peters’ Church and has significant value as referenced within the LCA BDC Part 3 of 5 re Lingwood & Part 2 of 5 (GNLP0379 southern boundary is shared boundary with both LCA Designated areas)* |
| 30.  30.  Cont. | Jan 2020  HELAA  Dec 2017 | SAB | Stage 4(ST4)  GLP0380  Stage 2(ST2) | ST4 summation includes the HELAA Stage 2 table within which GNLP 0380 site is categorised Amber regarding Significant Landscape Category. The statement referenced in ST4 “The potential loss of views of the open countryside to the west is a consideration”. | This ST4 evidence-based statement incorporates the HELAA Dec 2017 process. ***The HELAA Dec 2017 states “There would be no impact on designated landscapes, conservation areas or ecological sites, but development of the site may affect the setting of the church”.* There is no Church to be considered regarding the GNLP0380 site however given there is no landscape impact** the matrix colour code of Amber is not correct. ***Therefore ST4 GNLP0380 summation is based upon flawed HELAA***. Ref. 25 refers. |
| 31. | JAN 2020 | SAB | Stage 5 (ST5) | “GNLP0379 Site Area proposed as reasonable site 1.10 Number of dwellings Approx. 27 dwellings. | No amendments or revised HELAA SA/SEA to reflect any increase in area or number of dwellings. ***When site visit made??*** |
| 32. | Jan 2020 | SAB | Stage 6.(ST6)  Further Comments  Highways | GNLP 0296 - Comments -Highways  No. 110 dwellings. Buckenham Lane too narrow for 5.5m carriageway plus footway. Good visibility splays from Buckenham Rd to Norwich Rd. Highway slightly constrained, ***might be challenging to deliver adequately wide carriageway & footway***. | Subjective and non-evidenced based statement regarding carriageway widening & access limitation issues. |
| 33. | Jan 2020 | SAB | STS 6 -GNLP 0296  HEELA  SRS  SA Objective 10.  Policy 3 ENVIRONMENTAL PROTECTION AND ENHANCEMENT  Para 180. | The largest site promoted in Lingwood, it lies to the south-west, adjacent to existing development and ***a*) *with******some walkable access to services******(School?). b).****I*nitial highway evidence has indicated that a suitable access could be achieved, and that any impact on local roads could be mitigated. It is likely that the water supply and sewerage infrastructure network, including the water recycling centre, would need to be upgraded. **There are no known constraints from utilities infrastructure, contamination or ground instability, and there would be no loss of public open space.** There are areas within the site at risk of surface water flooding, and **the site is in agricultural land class 2. c). There would be no impact on designated landscapes, conservation areas or ecological sites,** but development of the site may reduce the gap between Lingwood and Strumpshaw and affect the setting of locally designated heritage assets. | ***a).Desktop SRS Assessment - D****istance to Lingwood Academy Primary School from Site entrance point - 0.4 miles.*  *No unmanned automatic Railway Level Crossing to be crossed to/from school*  *Number of Roads to be crossed - 3*  *Norwich Road*  *Memorial Way*  *Station Road*  ***b). In comparison to GNLP0379 - No compelling evidenced reasons for similar development of 50-60 houses (or more) as to why this is not the Preferred Site option.***  (RoSWF topography be re-evaluated for smaller Site Option)  ***c).*** *The strategic approach to heritage is first to consider the potential location of development, for example does the location itself "fit" well in relation to adjoining settlements, and does it avoid intruding in important views of historic assets? This is addressed through the growth strategy set out in policy 1.* No loss of intrinsic landscape value |
| Ref. | Date- if Known | Source Document | Specific  Reference | Document / Process | Objections / Comments / Discrepancies / Notes |
| 34. | Jan 2020 | SAB | ST6  GNLP 0379  Proposal | Residential development of approx. 27 dwellings and associated landscaping accessed from Post Office Road. | HELAA / SA/SEA are specific to approx. 27 dwellings. No defined change control process as per Site enlargement and increase of houses to 50-60 or more as detailed (ST7). |
| 35. | Jan 2020  Jan 2020 | SAB  SA/SEA | HELLA  Comparison Table p.4 ST2 | Amber Constraints in HELAA identifies Access, Accessibility to Services, Utilities Capacity, Flood Risk, Significant Landscapes, Townscapes, Biodiversity & Geodiversity, Historic Environment and Transport & Roads. | *9 Amber HELAA indicators pertaining to the non-amended site as Per Ref 30. No other assessed site within Lingwood have more than 7 Amber HELAA assessments. HELAA Amber constraints are based on 0379 (smaller original site) and not considered in the final Evaluation for the revised size and housing allocation given in ST7 Ref 25 , 30, 41* |
| 36. | Jan 2020  Feb 2019 | SAB  0379  BDC LCA  Pt.2 of 5 & Pt.3 of 5  Draft GNLP Part 1 Strategy | HELAA Conclusion  D4 Para 3.7.17  C2 Para 3.2.26-28  Policy 1 & 3 | **a.)** The site is in the north of the village, adjacent to housing and opposite Lingwood village green. **b).**There are areas within the site at risk of surface water flooding  (RoSWF), and the site is in agricultural land classes 1 and 2.  *c).* There would be no impact on designated landscapes, conservation areas or ecological sites, but development of the site may affect the setting of some listed buildings. | **a).**Conclusion confirms HELLA is specific stated at Ref.3  **b).**RoSWF - There are no existing watercourses near the site which is identified as having a RoSWF risks. Anecdotally localised pooling occurs across certain areas of the the entire field area during winter prior to the land lying fallow, prior to being tilled and crop sewing taking place.  **c)** ‘There would be no impact on designated landscapes’, Although not classified Designated Landscape, St Peter’s Church placement within the landscape interacts with the Site Proposal ***and assumes significance and is considered a distinct feature,*** as stated specifically within the BDC LCA Landscape Planning Guidelines , ***Landscape Planning Guidelines incorporate inherent landscape sensitivities***  ***Seek to conserve the landscape setting of manor houses, halls and churches; Seek to maintain key views towards churches, which are often key landscape features; Seek to conserve the landscape setting of Lingwood; Seek to ensure new development does not disrupt the smooth, predominantly uninterrupted skyline within the area; Seek to conserve open views across the farmland;*** |
| Ref. | Date- if Known | Source Document | Specific  Reference | Document / Process | Objections / Comments / Discrepancies / Notes |
| 37. | Jan 2020  13/6/19  25 Apr 19 | SAB  Highways  Email  (FOI Request)  GNLP Site  Assessment  Workshop 3  (FOI Request) | ST6  Further Comments  None stated  Highways Comments | Yes. 27 dwellings - Subject to removal of bank & trees to achieve acceptable visibility, carriageway widening to 5.5m, 2.0m frontage footway and pedestrian improvements to Post Office Road/Post Office Close junction.  **a)**“60 dwellings might be pushing it as Post Office Road is not a very good standard, **b)**is there any possibility that the site could be extended westwards over the whole frontage? That would enable road widening to an acceptable 6.0m (it appears PO Road is a bus route) Frontage development would change the feel of the road and encourage reduced vehicle speeds despite the effect of widening.”  “Narrow road but widening **c)** **could** make it acceptable, a **d) lot of mature trees on the frontage would need to be removed”** | Specific assessment /comment relating to Site Proposal given at ST 1 **a*.****)”60 dwellings might be pushing it”* What metrics, methodology and evaluation processes are used to consider this Comment as an objective, evidenced based analysis. The statement ***“pushing it”*** is subjective and open to scrutiny. **b)**. The statement *“any possibility the site* ***c)*** *could be extended westwards over the whole frontage”* indicates Highways had formulated this subjective suggestion( **could** as opposed to **will**), premised upon no or limited local knowledge of Post Office Rd evinced by the comment *“appears to on a bus route”* and *“frontage development would change the feel of the road”* which is intuitive. Furthermore *“and encourage reduced vehicle speeds despite the effect of widening*” is contra to the existing road layout. This is an erroneous comment and is made without considering the proximity of Millennium Park, very popular with children and adults alike. Therefore, any road widening including mitigation measures would create a degraded Road Safety environment when compared to the status quo. Some  **d) TPO’s are allocated to Oak trees along Post Office Rd requiring to be felled. One tree has been assessed as being 200 years old.** **The removal of these veteran trees would be contra to environmental mitigation actions re the proposed development and ‘best practice’**. The ‘feel of the road’ would certainly be a significant negative change for Road users and residents of Lingwood alike. |
| Ref. | Date if known | Source  Document | Specific  Reference | Document / Process | Objections / Comments / Discrepancies / Notes |
| 37.  cont. | Jan 2020 | SAB | ST 6 | e) cont. from previous page. | The Comments referenced within the email appears to be inceptor for the enlargement of the Proposed Site area and associated complete remodelling of Post Office Road. These subjective Highways comments do not bear close scrutiny and are not referenced within any available documentation including SA/SEA/HELAA. **e)** Nor is referenced any Risk Analysis of the eventual duelling of the A47, closure of existing A47 Lingwood Rd junction re widening of Post Office Rd, which will encouraging more road users to use Post Office Rd as a ‘transit route’ which is fronting North side of the Millennium Green Recreational Park. ***The existing road layout is the most effective traffic calming measure in Road safety, environmental impact and cost terms.*** |
| 38. | Jan 2020 | SAB | ST6  Development  Manager  &  Lead Local Flood Authority | Potential landscape impact with views impacted towards the Grade I listed church. Also, townscape issues with erosion of the rural character. Potential highway issues with Post Office Road due to it being narrow in places.  Significant information required at a planning stage. RoSWF mapping indicates that the site is affected by a surface water flow path in all return periods. In the 3.33% event the flow path appears mostly on the boundary of the site. In subsequent events there is a greater ingress into the site. The flow path affects the eastern side of the site to a depth of 0.3m. There is no watercourse near the site, but the location adjacent to an existing residential area suggests that sewer connections may be available. If not drainage of the site will be reliant on the results of infiltration testing. | NPS – Development Manager concurs with the view that any development ***will, (not may)***  impact upon the LCA evaluation and guidelines to be considered regarding Lingwood intrinsic landscape value and various Policies at local and National Level given at Ref. 3,5,10,11,14,15,17,18,19,20,28,29,34,35 within this document.  ***GNLP0379, is subject to RoSWF in all return periods and associated run off on to Post Office Road during heavy precipitation or snow melt.*** |
| Ref. | Date | Source  Document | Specific  Reference | Document / Process | Objections / Comments / Discrepancies / Notes |
| 39. | Jan 2020  Jan 2020  Jan 2020 | SAB  HELLA  SA/SEA | ST6  GNLP0380  Conclusion | HELLA Table identifies 7 Amber Categories HELAA Conclusion  The site lies to the west of the village, adjacent to and opposite housing. It has walkable access to services and **a).** initial highway evidence has indicated that a suitable access could be achieved, and that any impact on local roads could be mitigated. It is likely that the sewerage infrastructure network would need to be upgraded. There are no known constraints from utilities infrastructure, contamination or ground instability, and there would be no loss of public open space. There are areas at the site boundary at risk of surface water flooding, **b)** and the site is in agricultural land class 2. There would be no impact on designated landscapes, conservation areas or ecological sites, **c)** but development of the site may affect the setting of the church. Although the site has some constraints, it is considered suitable for the land availability assessment.  **d)**  See Comments right. | Two (potentially three), less Amber Categories than GNLP0379. HELAA category for Significant Landscapes is incorrect (**39 para c refers).** Historically this Proposed Site has had the support of the Burlingham and Lingwood Parish Council given at **Ref.2** a**.)** “initial highway evidence has indicated that a suitable access could be achieved, and that any impact on local roads could be mitigated”. Blofield Rd to the east of the proposed site does not require to be widened, its location at the beginning of the Village has a lesser impact when compared to the required road improvements and associated mentioned road safety issues as given in Ref 38 re GNLP0379 – original and Larger proposed site. **b.)** “and the site is in agricultural land class 2.” Is lesser grade ALC and is sequentially preferred to ALC grade 1/2 GNLP0379 Site. **c).** “but development of the site may affect the setting of the church” Incorrect entry on the HELAA Table re Significant Landscapes entry and can be amended to Green category. Therefore, re-assessed excluding the HELAA reference to the setting of the Church. ***There is no Church in close proximity to this Proposed Site***. **d).** ***This Proposed Site has been evaluated without a correct HELLA assessment re Significant Landscapes, is the preferred site location of the Parish Council and would have no impact upon Road design/mitigation requirements to the same magnitude and associated environmental and Road safety implications as site GNLP0379. GNLP0380 is acknowledged within the SAB, ST1-6 as a reasonable alternative and given the all aforementioned points bears closer scrutiny to be nominated as one of the preferred Sites instead of GNLP0379.*** |
| Ref. | Date if Known | Source  Document | Specific  Reference | Document / Process | Objections / Comments / Discrepancies / Notes |
| 40. | Jan 2020 | SAB | Stage 6 | Highways Yes. 30 dwellings. Frontage footway required, **a) “**may need removal of significant mature tree to facilitate visibility”. **b**) ) Possible speed limit enhancement required to manage down speeds at frontage. Would need visible frontage development to create a sense of place re vehicle speeds. | **a) & b**) “may need removal of significant mature tree to facilitate visibility”. Initial assessment of this site eastern perimeter suggests the singular mature tree may not impact upon road ‘arc of safe sight’ visibility regarding entry/exiting the proposed site area. Mitigation of visible frontage would ameliorate this issue. Ref 37.c refers |
| 41. | Jan 2020  Jan 2020  Mar 2020  2018 -20 | SA/SEA  HELLA  Crashmap.co.uk  Highways England  A47 Blofield - North Buckenham | B.29.12.4  Road & Transport  Planning  Submission Docs | All sites in this cluster are…  **a) ‘**well connected to the existing road network.’ The proposed development at these sites would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.  **b)** Proposed A47 new junctions, new entry and exit criteria | **a).**Hemblington Rd, Lingwood Rd, and Blofield Rd forms the north western route to and from Lingwood. The ***safety resilience of this road degrades*** approx. 300m west of Neaves Rd until either reaching the A47 via Hemblington Road or Yarmouth Rd in Blofield. Numerous unreported incidents occur on this road (loss of wing mirrors etc.), principally with opposite direction traffic, due to lack of driver consideration towards other road users as the road layout has reduced width with relatively few passing places available. **Significant vehicle road usage has increased, however the road layout and number of ‘designated’ passing places does not reflect this increase first established over the past 50 years.**  ***Number of reported accidents in the last 9 years: -***  ***4 Slight accidents (6 vehicles/6 casualties) 2 Serious accidents (2 vehicles/ 6 casualties) 1 Fatal accident ( 1 vehicle/ 1 Fatality).***  ***Any proposed increase of dwellings and the corresponding increase in the number vehicles using this route by extra residents and associated service*** *vehicles****; will*** ***contribute to a lessening of the overall safety of Pedestrians, Cyclists and occupants of vehicles alike without new road safety mitigation measures being identified, established and enforced..***  **b)** The dualling of the A47 will affect road usage in terms of access to A47 westbound as the Hemblington /Yarmouth Rd junction to the A47 will be westbound only with no eastbound exit. No modelling available, however, slight risk of more morning traffic usage regarding transiting to work west of Lingwood and perhaps less risk of evening traffic usage when returning from work from the west (cease work). |
| 42. | 25/04/19  12.05.19  30.05.19 | GNLP  Highways Copy Highways Copy | Site Assessment Workshop  Workshop Workshop | DM, Highways, ,Education GNLP Comments  GNLP0379 -27 dwellings plus road widening  GNLP0380 – 30 Dwellings | See ST 7  See ST 7 |

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| Ref. 43 -- Stage 7 (ST7) - Text Narrative | Objections / Comments / Discrepancies / Notes |
| Three reasonable alternative sites have been identified in the Lingwood and Burlingham, Beighton and Strumpshaw cluster at stage 5. These sites were worthy of further investigation to look at their potential for allocation as the initial assessment did not flag up any major constraints that would preclude allocation.  **a)** These sites have been subject to further discussion with Development Management,…..  **b)** Highways, Flood Authority and Children’s Services in order to identify preferred sites for allocation and their comments are recorded under stage six above. …..  **c -e.)** As part of this further discussion it was agreed that site GNLP0379 was the most appropriate site for allocation as..  **f)** it is centrally located in the village and..  has **g)** a safe walking route (Safe Route to School - SRS), to Lingwood Primary School….  **h-i)** GNLP0379 is proposed to be allocated on a larger boundary than submitted.  **j)FOI -GNLP Site Assessment Workshop 25/04/19**  **DM Comments “Issues with views across the church and townscapes in terms of the rural character, potential views to Grade 1 Church and townscape. CB would support but would need much bigger site, linear park to the north, would need to be an ambitious layout and design.”**  **k)** to allow for a linear parkland to be provided to the north to mitigate impact on the Grade I Listed church….  **l)** This larger boundary is supported by highways as it would enable highway mitigations to take place…  **m)** Space at Lingwood Primary School is forecast to be taken up in future years but Norfolk County Council (as education authority) has indicated they would accept development in the order of 50-60 new homes to enable a well-designed development to come forward….  n**)**  Sites GNLP0296 and GNLP0380 are considered to be reasonable alternatives. They are both considered to be good sites for development but are not proposed for allocation at the current time as the capacity for the cluster has already been met and exceeded on the preferred site….  **o)** In conclusion, one site is identified as a preferred option, providing for between 50-60 new homes in the cluster. ….  **p)** There are no carried forward residential allocations but there is a total of 44 additional dwellings with planning permission on small sites. This gives a total deliverable housing commitment for the cluster of between 94 –104 homes between 2018 – 2038. | The decision to nominate GNLP0379 as the preferred site ***bears close scrutiny and raises significant concerns as to the veracity of the entire Stage 1 -7 process***. Furthermore, the decision process appears to have selected subjective or non-quantified comments to compliment this decision. The following findings have been sourced from auditing the selection process and are referenced (where possible), within the sub-para to corroborate, substantiate or qualify the observation/comment being made. Findings are: -   1. Total conflict of interest as NPS represents NCC in the promotion of land owned by the NCC for the development. Ref. 4 refers 2. No reference within (SA/SEA -Road Network) is made regarding overall access to and from Lingwood via the western approaches, namely Blofield Rd. Were an RA/IA to be conducted and subsequently included within the SA/SEA B.29 Document, would clearly identify the inherent road safety risks an increase in the number of vehicles using Blofield Rd would present. (residents from the increased development and service vehicles). Empirical and anecdotal evidence highlights significant and continuing road safety risks to all road users whilst transiting between Blofield and approx. 300m west of Neaves Rd where the road layout becomes less of a safety issue. Any proposed development must consider this degraded road connectivity. Additionally, the planned duelling of the A47 & closure of Lingwood Rd will result in differing road user behaviour, which may lead to more local traffic using Blofield Rd when transiting east/west to/from Blofield. Ref. 27 para b, 28, c, 36 para c & 41. Refers. 3. ***Previous Reg 18 document states that GNLP0379 was the 3rd preferred option regarding development within Lingwood. Subsequent decision made at Stage 7 is not reflected in a change control procedure nor revised/amended HELLA/SA/SEA documentation to support this change. Ref. 2 refers*** 4. The preferred site proposal (ST 7), is at variance with the importance of maintaining the existing Strategic Gap and intrinsic Landscape value regarding the setting of St Peter’s Church the associated LCA planning guidelines which clearly states St. Peters Church assumes significance and is to be considered a distinct feature as given at Ref 35.c . Any mitigation measures regarding this Site (referenced as a nebulous tree/parkland to north) is not a mitigation option, as it would intrusively be adjacent to the Church and therefore in itself be at odds with the LCA aim to preserve the existing landscape and setting of Lingwood. Ref. 3,10,11,19,20,21,22,28 para b,29, 35. para c, & 37 Refers 5. The selection of GNLP0379 is contrary to NPPF policy, the ALC grade 1/2 land yields high quality crops and is sequentially secondary in comparison to the 2 other nominated reasonable sites within Lingwood. Ref. 5 refers 6. The during the previous and current selection and assessment processes GNLP0379 geographically was placed to the north of the Village and is located outside the Settlement boundary. ST4 re-locates GNLP0379 centrally to the village and thereafter ST6 (detailed assessment) repositions GNLP 0379 to the north of the village once more.   ST7 states the geographical position of GNLP 0379 is centrally located. This is factually incorrect in being ‘repositioned’ to the center of the village and this narrative, with emphasis is used to support (cut and paste from ST4?), the nomination of GNLP0379 as the preferred site. Ref 1 & 29.d refers   1. The SRS referenced within ST7 Text was modelled on out of date data and perhaps not reflect the installation of automatic level crossings being installed at both railway crossing points during Jan 2020. Therefore, the SRS is flawed as no SRS assessment was conducted after the removal of the manned level crossings at both road crossing points and Risk Assessed to reflect this significant change. ***Ref. 33.a refers*** 2. This statement ***“allocated on a larger boundary than submitted”*** confirms that the process and subsequent decision to nominate larger GNLP0379 Site as the Preferred Site for housing development is flawed. The use of **OUT OF DATE DATA,** namely the cited HELAA & SA/SEA **(referenced evidenced based source documentation ST1 -6)** is applied to justify the decision given at ST7. This decision taken at ST7 is non-compliant with the referenced Process Methodology as detailed within the Site Assessment Process Methodology Document Part One Introduction para 1.1-2 and ‘Towards a Strategy’ approved by the GNDB Jan 2019.   The original Site Proposal (area and number of dwellings), is stated throughout ST1-ST6, no reference is made to the higher number of houses and larger area whatsoever. No change management control mechanisms appear to have been applied to justify the decision made at ST7 to nominate GNLP0379 **i)** (**almost 5 times increase in area, minimum of 50-60 house or more depending upon the developer’s submission).**  **Email 13/06/19 (FOI Request**), Clearly states that the Highways comments prior to this date were based upon 27 dwellings namely the original GNLP0379. ***This confirms the premise that the entire ST 1-6 process has been undertaken without any due regard to the relatively last-minute decision to increase both the size, ranking of the Site and number of dwellings 60+ at the GNLP 0379 Site.*** ***The veracity and transparency of amending the proposal as detailed within the ST7 stage of the SAB is fundamentally flawed. The entire process regarding the nomination off GNLP0379 is negated in using out of date data. The given timeline of events suggests last minute decision making as per stated by the Senior Planning Officer GNLP Team stated in the email trail “to push the numbers up I would be very grateful. Unfortunately, we would need this information asap to help us finalise policies by the end of next week (approx. 21/06/19).” This is late amendment is reflected in the map denoting the new GNLP0379 proposal is dated Nov 2019.***  *Therefore, this disconnect in process between ST1-6 and subsequently ST7 de-legitimatises the overall process and the subsequent opaque, unverifiable decision taken to state GNLP0379. as Preferred Site.is gi*ven at 43 **j)** Ref 6,10,14,15,18,20,21,22, b ,24,33, 35.c, 37 , 42 Refers.  The establishment of a **k)** ‘linear park way’ to mitigate the impact of the housing development upon St. Peter’s Church – See Para **d)** of this ST7 Comment refers  **l)** Ref 37, refers    m) This statement indicates Education Authority are the decision makers  for locating extra 50-60 homes in that it **would accept development in**  **the order of 50-60 new homes to enable a well-designed development**  **to come forward. As detailed in the GNLP Site Assessment Workshop**  **No.3 - 25/04/19 states Education comments confirms the GNDP (Ref.**  **23), policy that the “number of homes to be more than 60 homes to**  **avoid constraints on school expansion.” Which is clearly**  **the overarching determining factor regarding GNLP0379 as the**  **suitable option for housing in terms of numbers irrespective that**  **evidenced based analysis of the Site Assessment procedure identifies**  **nonadherence to procedures and the decision taken was**  **compromised using out of date data.**    **n*) There are compelling reasons stated within in this document as to revaluate the GNLP recommendation for GNLP0379 to be the Preferred Site proposal as the reasonable alternatives, in particular GNLP0380 has of an***  ***overall lesser environmental, services and land usage impact.***  **o-p) The housing capacity for Lingwood is opaque in terms of whether the stated**  **housing allocation figures include the Old School Site on Chapel Rd*.***  ***The exclusion from the entire process of the relatively late notice***  ***planning approval of the Old School Site for planning permission and***  ***subsequent houses not being accounted for within all***  ***documentation is a significant omission, specifically as NPS are***  ***promoters of both Sites Ref. 4 & 17. a refers.*** |