**MY OBJECTIONS AND COMMENTS ARE DIVIDED INTO THREE KEY SECTIONS:**

1. **KEY OBJECTIONS TO GNLP0379**
2. **THE IMPACT THE INCREASED HOUSING NUMBERS WILL CREATE FOR LINGWOOD**
3. **MEETING THE VILLAGE CLUSTER REQUIREMENT**

**OBJECTIONS GNLP0379, POST OFFICE RD, PROPOSED GREENFIELD SITE:**

* **Proposed widening of Post Office Rd and potential increased traffic speeds.**

I refer to the online documentation for ‘Lingwood, Burlingham, Strumpshaw & Beighton’ New allocations proposed POLICY GNLP0379 ‘notes’, which states:

“*A larger site, along the whole road frontage, would enable road widening to an acceptable standard and encourage a reduction in vehicle speeds*”.

The existing layout of the road creates a natural traffic calming effect. Post Office Road narrows at the point where there are hedgerows and trees on both sides and in the location of the Millennium Green children’s playground. As a resident of Lingwood, I can confirm that traffic travelling along Post Office Rd, from Norwich, will automatically slow down and stop to allow oncoming vehicles through. A traffic survey would verify this.

A Highways email, dated 13 June 2019 (FOI request) states:

*’60 dwellings might be pushing it as Post office Road is not a very good standard’*

The phrase *‘pushing it’* implies an opinion and not an evidence-based statement. Please can you confirm what evaluation processes have been conducted to confirm that the widening of the road would result in a reduction of traffic speed? I can find no references to this. The widening of the road would, I believe, create the opposite effect and increase speeds.

* **Child safety issues - The only proposed site located near to a play park:**

The Millennium Green playpark lies directly opposite the proposed site; therefore, any development needs to take into consideration the following child safety issues:

* The increased traffic speed associated with the road widening.
* The increased volume of traffic on Post Office Rd, residents and deliveries.
* The access/crossing point from the new development to the children’s playpark.
* No street lighting in the village.
* **Loss of ‘Landscape Character Value’, the ’Strategic Gap’ and important views of ‘historic assets’.**

**This is only site with a grade 1 Medieval Church with a view over open farmland**. The uniqueness of this location is a combination of the open view across farmland and the important Heritage Landscape Character view of St. Peter’s church. The significance of St. Peter’s church setting has been identified in these documents:

**‘Landscape Character Assessment Document issued by Broadland District Council***. Part 3 of 5 C2: FREETHORPE’*: ‘Summary of visual character’ and ‘Landscape Planning Guidelines’

The following quotes refer specifically to the ‘Freethorpe Plateau Farmland Landscape Character Type’, i.e. the ‘Strategic Gap’ from Post Office Road to St. Peter’s church and the intrinsic landscape character value:

* *Seek to conserve the landscape setting of Lingwood;*
* *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 open views across the farmland;*
* *Seek to ensure new development does not disrupt the smooth, predominantly uninterrupted skyline within the are**a.*

Equally, **The National Planning Policy Framework (NPPF)** refers:

(Ref. Draft GNLP Local Plan Strategy Policies Policy 1 ref 5 Jan 2020, GNLP Policy 2.5 landscape NPPF 2.8.(c) 3.20 (d)

‘*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.’*

Additionally, the **Site Assessment Booklet** (ST6 development Manager) quotes:

*‘Potential landscape impact with views impacted towards the Grade 1 listed church. Also, townscape issues with erosion of the rural character’*

And last but not least the Draft **GNLP Local Plan Strategy Polices** refers**:**

*‘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’*

**The GNLP0379 site proposal is completely at variance with all the above stated planning guidelines**. St. Peter’s church should be seen from the village without compromising and obscuring the view with a new development.

At the **Broadland District Council Planning Committee** meeting, planning application was refused in respect of: Church View, Church Road, Lingwood, NR13 4TR (ref:20190881)

The ***Broadland District Council Planning Agenda****, dated Wed 2/10/20, pages 9-11* refers*:*

*‘the dwelling would dominate the isolated and undeveloped rural setting of the Grade 1 listed church’*. **The respective planning authority guidelines are quoted within this refusal statement. The reasons for objection are equally applicable to the GNLP0379 site proposal.**

The intrinsic Landscape Value of St Peters suggests no development should be justified nor any attempt be made to mitigate the impact of any such a development without adversely affecting the Landscape Character Value and setting of the St Peter’s Church. Once it is gone, it is gone forever, a setting to preserve for future generations. Based upon this factor alone, this should be the last site chosen rather than the first preferred site in the village.

* **GNLP0379 has the highest-grade agricultural land**

**GNLP Lingwood & Burlingham Cluster Assessment Booklet** HELAA Conclusion (Stage 6) refers:

**GNLP0379 – ‘**the site is in *agricultural land classes 1 and 2.’*

**GNLP0296 –** ‘agricultural land class 2’

**GNLP0380 –** ‘agricultural land class 2’.

The government website 1.2 **National Planning Policy Framework (NPPF) 2012** refers:

*‘4.1* *Grade 1 - excellent quality agricultural land’*

*“Land with no or very minor limitations. A very wide range of agricultural and Yields are high and less variable than on land of lower quality.”*

**1.2 National Planning Policy Framework (NPPF) 201**

“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 land, 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”

GNLP0379 by definition has **Grade 1 - excellent quality agricultural land, therefore other sites which have poorer quality land should be chosen first.**

* **Change to road frontage, loss of veteran trees, surface water flooding and Sewerage issues:**
* Firstly, the proposed widening of Post Office Rd would mean the loss of several veteran trees on Post Office Rd. One oak tree has been assessed as being 200 years old.The **GNLP Site Assessment Workshop 3** (FOI request) ‘Highways Comments refers:

“Narrow road but widening could make it acceptable, a lot of mature trees on the frontage would need to be removed”

In view of the loss of a significant number of trees, the other site proposals should be measured in this regard. I am not aware of any trees with TPO’s on Site GNLP0380, for example

* Secondly, Hedgerows and the wildlife habitat would be *destroyed.*
* Thirdly, *“There are areas within the site at risk of surface water flooding*”. This particularly applies to the southern border where the land does not drain easily. The removal of the field banking combined with the site sloping onto Post Office Rd on the south side, the concreting over of much of the site and increased rainfall due to climate change will exacerbate the problem and cause flooding.
* Drainage issues at present are a huge concern for Lingwood and Strumpshaw, at times of heavy rainfall, water struggles to get away. See EDP article dated 7 October 19 relating to fire crews attending flooding incidents in Lingwood and other villages. Highway surface water flooding problems occur with Post Office Rd/Post Office Close junction.
* Concerns that the village sewerage system will be over whelmed.
* **Ambiguous number of houses and no site plans:**
* The village cluster has 44 houses with planning permission PLUS the GNLP documentation states “GNLP0379 is likely to accommodate 50 -60 homes” AND *“More homes subject to an acceptable design being achieved.”*

The **GNLP Draft Local Plan – part 2 site allocations**, under **‘New allocations proposed’** refers:

‘*POLICY GNLP0379 Land north of Post Office Road, Lingwood (approx. 4.74ha) is allocated for residential development, including a large are of open space. The site is likely to accommodate 50 -60 homes, 33% of which will be affordable’*

**Crucially**, it also sates: ‘*More homes may be accommodated, subject to an acceptable design and layout being achieved’.* **Critically, this would have a significant effect on the local infrastructure.**

* The plan is unclear where the landscape or open space will be located. The **GNLP Draft Local Plan – part 2 site allocations**, under **‘New allocations proposed’** states:

*‘Housing to be focussed on the part of the site fronting Post Office Road with landscaping to the north to minimise the impact of the development on the wider landscape and Grade 1 listed church.’*

Discussions at the GNLP Roadshow, i.e. the Consultation forum, suggested that other layouts may be considered, however there was no specific information available or site plans to see.

**We are in the public consultation period, this being the only opportunity to object and make comments, and we are presented with ambiguous information to comment on: variable house numbers, no site plans, no details of access to the site etc.**

* **Unexplained change in the size and ranking of the GNLP0379 site – Why?**
* In 2018 the **1st Regulation 18 Consultation GNLP Site Proposals Document, dated 08.01 -22.03.18 (page 65, section 3.25 Lingwood & Burlingham,** refers**:**

*“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”*

In 2018, GNLP0379 was the 3rd option. In 2020, the GNLP have stated that GNLP0379 is their preferred option. Please can you confirm what information relating to the sites has changed and what site assessments have taken place on all the sites that specifically indicate GNLP0379 to be a better option?

* The **GNLP Site Assessment, HELAA comparison table, page 4, stage 2,** identifies the following AMBER constraints for GNLP0379:

*‘Site Access, Access to services, Utilities Capacity, Flood Risk, Significant Landscapes, Sensitive Townscapes, Biodiversity & Geodiversity, Historic Environment, and Transport & Roads.’*

**There are 9 AMBER HELAA indicators for GNLP0379. No other assessed site for Lingwood has more than 7 AMBER indicators, including sites GNLP0296 and GNLP0380. Why therefore, is this not reflected in the proposed preferred site choice?**

**Given the aforementioned points of concern, GNLP0379 is not the right site.**

There are reasonable alternatives which would match the GNLP village cluster requirement on housing numbers. (see below - Meeting the Village Cluster requirement)

**LINGWOOD VILLAGE INFRASTRUCTURE**

* **Increased housing numbers are too large for the village infrastructure:**
* Lingwood has 44 dwellings with planning permission on small sites, in addition to the 50 -60 homes required for ‘Village Cluster’ with a school. This *‘gives a total deliverable housing commitment for the cluster of between 94 – 104 homes between 2018 – 2038.’*

Firstly, Schooling: **The first GNLP statement taken from the GNLP Site Assessment Booklet – Settlement Hierarchy** states:

*‘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.’*

The **GNLP Site Assessment Booklet – stage 7** states**:**

*‘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’*

The does not take into account the GNLP statement ‘*More homes may be accommodated, subject to an acceptable design and layout being achieved* ‘and **the fact that the Education Authority have not approved a higher number.**

The fact that the education authority would accept 50 - 60 homes, should not dictate which site is chosen. (The GNLP appear to have positioned their preferred suite option based on numbers provided by the Education Authority – there are other sites which would meet the quota.

**This is a considerable divergence from the original assessment and the implications to the village infrastructure as a whole.**

* Other infrastructure concerns are in relation to: Doctor and medical services – these services are already severely strained without the addition of new developments at Acle, Brundall, Blofield and the proposed development at Lingwood. There is one shop with inadequate parking and concerns that the village sewerage system will be overwhelmed.
* **Blofield Rd access to Lingwood – increased traffic will compromise safety even further:**

At present, there is a significant safety factor regarding notified and unnotified incidents. (e.g. wing mirrors being taken off).

The website: **crashcamp.co.uk** provides data in respect of the 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)’ (Recent)

The original narrow road, with designated passing places traffic does not reflect the significant increase in road use today. Additionally, the proposed new housing quota will considerably increase traffic volumes in respect of residents and deliveries. Additional traffic due to the permanent closure of the Lingwood Lane, following the expansion and dualling of the A47, will compound the situation.

There are no proposals to mitigate against the increased volume of traffic within the GNLP Site Assessment guide regarding overall access to Lingwood via the western approach, i.e. Blofield Rd. **A safety assessment needs to be conducted in respect of the safety of pedestrians, cyclists and vehicles and their occupants.**

**Blofield Rd requires significant safety improvements regardless of the site chosen. This statement is also endorsed by the Lingwood & Burlingham Parish Council:**

**‘***With any development in Lingwood, Blofield Road will need to be made wider instead of narrow with passing places*.’

**MEETING THE VILLAGE CLUSTER REQUIREMENT:**

For the reasons specified above **GNLP0379 is not the right site. I recognise that the need to provide housing in line with the village cluster requirement however I am aware of the significant impact the increased dwelling numbers will create for Lingwood, particularly in view of the dangerous Blofield Rd.**

So how to meet the requirement of 50 -60 homes? (in addition to the 44 dwellings with planning permission in the cluster)

* **The Old School Site, Chapel Road:**
* **The Old School site**, could take 22- 25 homes and meet the requirement for housing numbers. This is a brownfield site and lies within the existing settlement boundaries and therefore should be the first choice of site allocation. The GNLP quote:

*‘we will continue to protect the most valued parts of our area and enhance the green infrastructure for nature and people. To help do this, the GNLP will maximise the amount of development on ‘brownfield sites.’*

**Planning permission was granted** on 16 October 2019, as detailed in the the BDC/NCC Deed of Planning Obligation Sec 106. TCP Act 1990 Lingwood First and Nursery School**, Chapel Rd, Ref: 20190278.**

**This is in addition to the 44 dwellings with planning permission; therefore, the school brownfield site of approx. 22 -25 homes should be taken into account within the overall 50 -60 homes allocation.**

* **GNLP0380 – Land west of Blofield Rd:**
* The site is promoted for approx. 30 dwellings therefore in conjunction with the Old School Site would meet the requirements of the capacity of the cluster.

When comparing the distance to the shops and school the from the GNLP0380 site and from GNLP0379 the results are marginal:

GNLP0380 to the shop 0.5 miles and to the school 0.7 miles

GNLP0379 to the shop 0.7 miles and the school 0.5 miles

The **GNLP Draft Local Plan – part 2 site *allocations***‘states that the GNLP0380 site ‘*would act as a gateway site into the village creating a sense of place’*. The site could also be expanded if needed, at a later date. Additionally, there are a number of factors why this would be a better choice than GNLP0379: less traffic around the Millennium Park, thereby alleviating the safety issues in terms of access to the park and road widening. Protection of better-quality farmland and the far-reaching Landscape Character Value view of St. Peter’s Church over open farmland. Given the aforementioned points GNLp0380 should be the GNLP preferred site.

In 2018, the **Lingwood & Burlingham Parish Council submitted a ‘Support’ in relation to GNLP0380. Representation ID: 12989, dated 12/02/2018 refers:**

*‘Representation: The preferred option as on entering the Village so does not encourage ‘through’ traffic. N.B the Parish Council would prefer the brownfield site at the Old 1st School, Chapel Road, shown as a commitment, to be used before any greenfield site’*

**In line with their historical views, at the Parish Council meeting on Tue 3 March 2020, the Parish Council confirmed their first choice of development as the Old School Site and GNLP0380**.