**17th March 2021**

**Response from Lingwood and Burlingham Parish Council concerning Lingwood and Burlingham, Strumpshaw and Beighton village cluster.**

Our rural communities fully understand and accept their responsibility to accommodate an appropriate number of new homes and are happy to co-operate. However, we wish to make the following comments:-

**GNLP4016 - Additional site in Station Road, Lingwood, adjacent to Lingwood Primary Academy.**

We request the site GNLP4016 be removed from the Greater Norwich Development Plan for the following reasons:-

1. We believe inclusion of this site may be unlawful since it appears to contravene Reg 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (Duty to Consult), and the National Planning Policy Framework (paragraph 16 (c)), and the Government's Guidance on Plan Making 2020, inasmuch as the local community was never notified of its inclusion. The site was never presented for consultation at Reg 18 stage of the GNLP's site allocations, and the Parish Council has never been given the opportunity to consult with the wider community or comment upon its inclusion. We understand the site was suggested by an unknown source just three months before the Board's formal approval of the Draft GNLP sites document. We further understand the Parish Council should have been informed of alterations to the draft GNLP before its approval by the Board
2. The site adjoins the boundary of our local school and development of the site will jeopardise future expansion of the school. The Government aims to allow permitted development for a (free) 25% increase in the footprint of school buildings providing, “*The site would already have sufficient land to build the extension or new building”* and, *“Playing fields would continue to be protected”.* (Supporting Housing Delivery and Public Service Infrastructure, Dec 2020, para 34 – 36). If the site were to be developed for housing, our school would never be able to expand in the future. The school was opened in 2015 following amalgamation of two inadequate buildings on other sites in the village and is already dangerously near to capacity. The site GNLP4016 is owned by Norfolk County Council who is also the education authority. (Please see paragraph a) below).
3. The site is designated agricultural land and is outside the development boundary. It is tenanted by a local farming family under the name of Lingwood Care Farm which provides therapy and hands-on farming experiences for vulnerable adults with any physical or mental disability. Lingwood Care Farm is constantly developing its service to vulnerable people in line with the Government's 'Green Social Prescribing' project. Also, the Care Farm has planted a shared woodland on the site GNLP4016 for use by the neighbouring primary school in line with the Government's 'green space' policy. Although their tenancy has only five years left to run, the Parish Council expects the landowners - Norfolk County Council - to recognise the invaluable work of Lingwood Care Farm and to extend their lease accordingly. (We understand Lingwood Care Farm has never been notified by Norfolk County Council, or by the GNDP Board, of any proposals which might involve termination their tenancy).
4. Broadland District Council's Landscape Character Assessment (3.6.28 - Landscape Planning Guidelines) says of Lingwood, *“Seek to conserve the landscape setting of* *Lingwood”*. And, *“Seek to conserve open views across the farmland”*. And, *“Seek to maintain key views towards churches.”* Development of GNLP4016 would be contrary to these guidelines.
5. The GNLP proposals advise the public footpath along the road would need to be widened, thus necessitating removal of a hedgerow which appears to be protected under the Hedgerow Regulations, 1997. The preservation of this hedgerow and trees was a condition of planning permission for both the School and the adjacent Village Hall.
6. Properties built on this site would overlook children playing in a school playground. A residential home/sheltered accommodation has been mentioned and this may not be appropriate next to a primary school.
7. The Government intends to give priority to the development of Brownfield sites and the protection of rural areas.(Planning for the Future, various documents).

**Site of old school in Chapel Road, Lingwood - 20+ properties**

This site is not included as an allocated site in the draft GNLP since it is earmarked as 'windfall'. We believe this site should be included in the GNLP as allocated land, and NOTas 'windfall', for the following reasons:-

1. The Government's definition of 'windfall sites' is, “*Those sites which become available for development unexpectedly and are therefore not included as allocated land on a planning authority's development plan”.* (Select Committee on Environment, Transport & Regional Affairs, 10th Report, Annex 1)
2. The proposed development of the Chapel Road site has never been 'unexpected'. Norfolk County Council decided to build a new school elsewhere with the intention of selling the Chapel Road site for development.
3. The site is listed in the Register of Brownfield Sites held by Broadland District Council, and is not, therefore, 'available for development unexpectedly'.
4. Outline planning permission for residential development was granted for the Chapel Road site on 22nd April, 2015 (20140979) but lapsed on 21st April, 2018.
5. The GNLP call for sites was launched in 2016 when outline planning permission on the site would still have been live. However, Reg 18, Public Consultation on New, Revised and Small Sites, ran from 29 Oct – 14 Dec 2018. We believe the site in Chapel Road should have been included in this consultation since outline planning permission had expired earlier.
6. The National Planning Policy Framework (Method – Stage 3) states, *“A windfall allowance may be justified in the anticipated supply if a local planning authority has compelling evidence as set out in Paragraph 70 of the NPPF*”, i.e. if there is ,*”Compelling evidence that (the site) will provide a reliable source of supply”.*
7. Outline planning approval for the site was granted for a second time 16 October 2019 (20190278) and is being carried forward.

**General points regarding the Village Cluster of Lingwood and Burlingham, Strumpshaw and Beighton:-**

**a) School.**

The GNLP Lingwood and Burlingham Cluster Assessment Booklet 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.”*

However, the GNLP Reg 19 publication now states, *“Norfolk County Council (as education authority) would accept development in the order of 50- 60 new homes”.* (Village Clusters, Lingwood 6.77)

In February, 2021, the school advised the Parish Council that the current capacity is now circa 89%. (Total number of pupils currently attending is 243. Total number of free spaces is 30).

How can Norfolk County Council (as education authority) now accept development in the order of 50-60 new homes unless the school is extended? And how can the school extend if the allocated site GNLP4016 above, which is owned by Norfolk County Council, is sold for residential development?

**b) Number of proposed residential properties.**

As noted in a) above, the GNDP Board agreed, *“housing allocation will be limited to 12 – 20 dwellings”*

The GNLP Reg 19 publication states, *“Two sites are allocated providing for a total of 60 new homes in the cluster............There is a total of 77 additional dwellings with planning permission on small sites. This gives a total deliverable housing commitment for the cluster of 137 homes between 2018 – 2038.”* (Village Clusters, Lingwood, 6.78) It is not clear whether this figure includes the 39+ properties built between 2014 – 2017.

How did the total number of proposed dwellings for the cluster climb from a maximum of 12 -20 to 137?

**c) Infrastructure**

The Parish Councils, and many local residents, have consistently advised the Board that roads are not adequate and must be improved before further development takes place. Each of the three access roads into Lingwood and Strumpshaw are, literally, country lanes. One is so narrow it has 'passing places'. The other two roads have dangerous hairpin bends. These lanes are wide enough for two cars to pass each other with caution, though not lorries or buses except at certain points. There have been serious accidents and fatalities on all these roads.

Just one small corner shop serves all four villages in the cluster. We need a larger shop with safer parking, and a GPs' surgery, before the villages are developed further.

Yours sincerely

**sgdickinson**

Mrs Sonya Dickinson

Clerk on behalf of the Council