Greater Norwich Local Plan Reg 19 Publication Consultation

Statement of Common Ground

Between

Hingham Town Council

And

Clayland Estates Ltd

Regarding

Proposed Residential Site Allocations for Hingham

1. The above parties have noted that their position in relation to objections against the Reg 19 Publication Draft of the Greater Norwich Local Plan is similar in respect of many aspects in relation to the proposed site allocations for Hingham.

2. The above parties wish to formally record where their position in relation to the draft Local Plan is similar by way of this statement of Common Ground

3. The parties have, independently of each other and based on their own assessments of the plan and evidence gathered, made separate representations in respect of the Draft Local Plan consultations and this document is intended to highlight the areas where the parties have expressed objection on similar grounds.

4. Whilst accepting that a Statement of Common Ground is more commonly prepared between a Planning Authority and a Site Promoter, rather than involving the Town Council, nevertheless the parties believe such a statement will be useful to an Inspector when determining some aspects of the plan to study during the Examination in Public, and whether the plan requires modification to be considered Sound.

5. This statement is not intended to detract from either party's representations, on any points made regarding the Reg 19 Publication Draft of the Greater Norwich Local Plan, or any points made on any document open for comment during the Reg 19 consultation, where those points made do not reflect common ground.

6. The parties consider that the initial HELAA Site Suitability Assessment undertaken as the principal tool in assessing and comparing sites is unsound. It was not conducted accurately, or in an objective or consistent manner. If an objective assessment had been undertaken, and proper regard given to representations, the sound logical conclusion based on the evidence would have been to not allocate GNLP0520 for development.

7. The parties consider that the selection of GNLP0520 at Norwich Road Hingham as a site for 80 dwellings is unsound in that it does not have sufficient regard to the flood risk and surface

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water management issues that exist for that site. These were acknowledged in the draft policy as requiring further investigation, and certainly, on the basis of the experience from The Hops development adjoining, developed by the same land promoter, are likely to cause significant and detrimental flooding and surface water management issues to adjoining lower lying areas of Hingham to the south/southwest of GNLP0520.

8. The parties consider the allocation of GNLP0520 unsound in that it fails to protect against the adverse effect development of this area will have on heritage assets and their setting. This includes 2 nearby listed properties, the long distance views of Hingham church which are noted as important, the adverse effect on the valued landscape to the south of Norwich Rd and views on the approach to the town from the east and the long views of the landscape from the south.

9. The parties have concerns that the proposed terms of allocation of GNLP0520 are unsound in that they include requirements which are not achievable ie *" an adequate visibility splay incorporating footways to be provided along the whole site frontage".* This is not achievable given the existing TPO protected trees on the frontage, and the requirement for *"an active frontage along Norwich Road"*, which is incompatible with both the trees and highway safety, given that part of the site is opposite the Ironside Way industrial area access.

10. The parties consider the allocation of GNLP0520 unsound in respect of the potential conflict between the B2 industrial uses existing in Ironside Way and the proposed residential allocation. B2 industrial uses and residential uses are not compatible neighbours. The allocation of GNLP0520 has failed to consider the implications of the allocation (carried forward) of Policy HIN2 (Land adjacent to Hingham Industrial Estate at Ironside Way, Hingham allocated for employment uses in Classes E(g)/B2/B8) as an extension to the existing industrial estate, with regard to the inevitable increase in commercial traffic movement via the existing access into Ironside way.

11. The parties consider the criteria applied to the allocation of GNLP0503, in requiring a continuous western side footpath link from the site to the centre, unsound in that it is not feasible or achievable.

12. Both parties are aware, as discussed at Hingham Town Council meeting on 2nd March 2021, that the site at Dereham Road Hingham GNLP0503 may no longer be available and may be withdrawn by the landowner from consideration in the GNLP. Both parties agree that the loss of availability of that site allocation would be additional grounds that make the plan unsound and would require the allocations for Hingham to be revisited, as the proposed allocations would then not provide for the strategic numbers of additional dwellings identified for the town.

13. The parties consider the process adopted by the Greater Norwich Development Partnership and GNLP team in the preparation of the draft local plan is unsound in relation to NPPF para 15, para 16 c in that it has failed to give any weight to the views of the local community, on non-strategic policies. These were expressed in representations made both directly by residents to the GNLP consultations and via the representation submitted by Hingham Town Council. There is clear guidance within those paragraphs and NPPF paras 28-30 that non-strategic policies should be influenced by local views.

14. The parties request that GNLP and the Inspector at EIP have regard to the weight of evidence submitted by both parties individually now and at all stages of the Local Plan process.

Signed ..... On behalf of Hingham Town Council

Signed ..... On behalf of Hingham Town Council

Signed ..... On behalf of Clayland Estates Ltd

Dated 15.03.2021.