

Greater Norwich Local Plan Regulation 19 Consultation Response

From

Hingham Town Council

Prepared by

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NOTES AND CONTEXT OF THIS GNLP REGULATION 19 REPRESENTATION DOCUMENT

This representation document has been prepared by Hingham Town Council and should be read in conjunction with the representation document submitted during the Regulation 18C consultation.

(GNLP RESPONSE as submitted doc. Available to view as a downloadable PDF at <https://gnlp.oc2.uk/document/regs/13571> and at <https://hinghamtowncouncil.norfolkparishes.gov.uk/files/2017/05/GNLP-RESPONSE-as-submitted-DOC.pdf>)

The Regulations18C representation document was prepared having gathered public opinion through Councillor attendance at the GNLP Regulation 18C Hingham roadshow event on 25th February 2020, corresponded and met with members of the GNLP team, received and discussed correspondence and held a dedicated GNLP public participation session at the Town Council meeting on 03 March 2020. The representation document was submitted to the GNLP consultation on 16 March 2020 and was sent directly to ALL District Councillors for the South Norfolk Area.

This Regulation 19 representation document is intended to represent the views submitted by residents to the Town Council, during and since the Regulation 18C consultation (including during the Regulation 19 consultation period).

With specific reference to the Regulation 19 consultation, this has been an agenda item at the Hingham Town Council meetings on 02 February and 02 March 2021 (unfortunately due to Coronavirus restrictions these meetings were not able to be held in person, but via Zoom) and was also discussed during the Public participation sessions of both meetings. A draft version of this Regulation 19 representation document (work in progress) was available on the Hingham Town Council website, prior to the meeting of 02 March 2021.

A brief survey was made to ascertain the views of residents of The Hops development (HIN1 development in the previous plan, adjacent to the site GNLP0520), with regards to the issues of pedestrian safety, access to the town's facilities and surface water/flooding issues. (This survey was undertaken because these are issues that were raised as representations in the Reg. 18C consultation and are issues that would be likely to affect residents of GNLP0520 in a similar way due to the adjacent nature of the sites).

A brief survey was made to ascertain the view of residents of Seamere Rd regarding issues relating to surface water run off and flooding issues. (This survey was undertaken because these are issues that were raised as representations in the Reg. 18C consultation with regard to the development of GNLP0520).

The GNLP regulation 19 consultation was advertised in the Hingham Parish Magazine and on local social media with residents being invited to contact the Town Council with their views.

Conclusion

Soundness:

The plan is not justified as it is not based on proportionate evidence

Some of the information contained within the evidence base documents is incorrect

Reasonable alternatives have not been adequately assessed or considered

Contradictions between the GNLP and the National Planning Policy Framework and the South Norfolk Development Management Policies (2015) document

Contradictions between the GNLP strategy and the site allocations (the allocations do not support the strategy policies or the aspirations of the GNLP)

Legal Compliance:

There has been a failure to comply with the South Norfolk Council Statement of Community Involvement

Duty to Co-operate:

The plan making process **has not** engaged **constructively, actively** and on an **ongoing basis** with neighbouring authorities and certain other bodies over strategic matters during the preparation of the plan.

- The GNLP should not be adopted with the inclusion of GNLP0503 or GNLP0520.
- Proper regard should be given to the representations made by the community, especially with regard to flooding issues, potential impact on historical heritage, the protection of valued landscape, the adequacy of footway links and proximity to ALL of the town's facilities. Consideration MUST be given to the benefits that each site would provide to the community, to the infrastructure requirements of the Town and the aspirations of the community/Town Council for "future proofing" Hingham to be able to provide facilities to sustain a growing community.
- Duty to Co-operate needs to be fulfilled to ensure that allocation of any sites for development is based on firm evidence and that proposals and policies made in order to mitigate, are actually feasible and achievable.
- Reconsider the housing numbers allocated for Hingham/Reconsult to allow for alternative sites to come forward and for representations to be made on them.
- Reasonable alternatives have not been adequately assessed or considered, including the "reasonable alternative" that none of the sites put forward in Hingham are able to be considered as suitable for development.

FORMAT FOR REPRESENTATIONS - BASED ON THE MODEL FORM

REPRESENTATION 1

Representation

**3. To which part of the Local Plan does this representation relate?
(Paragraph, table/diagram, policy, map etc)**

Site specific – relating to GNLPO503

Representation regarding the inclusion in the GNL of (Land north of Springfield Way and west of Dereham Road) GNLPO503, for develop of approximately 20 homes.

Part 2, The Sites, Key Service Centres, Hingham

<https://www.gnl.org.uk/regulation-19-publication-part-2-sites-5-key-service-centre-hingham-new-allocations/policy-gnlp0503>

Paragraph 5.38 Development of up to 20 dwellings would be acceptable on this site subject to provision of a safe access and a continuous footway at the west side of Dereham Road from the site access to Pottles Alley. A 30mph speed limit extension would be required to include the site frontage. Minor carriageway widening may also be required.

Policy GNLPO503

Land north of Springfield Way and west of Dereham Road, Hingham (approx. 0.85 ha) is allocated for residential development. This will accommodate 20 homes.

More homes may be accommodated, subject to an acceptable design and layout being achieved, and any infrastructure issues addressed.

The development will be expected to address the following specific matters:

The provision of a safe access onto Dereham Road, including promotion of a Traffic Regulation Order to extend the existing 30mph speed limit along the site frontage.

Provision of a continuous footway at the west side of Dereham Road from the site access to Pottles Alley.

The design and layout of the scheme will need to consider and mitigate potential amenity impacts of the neighbouring farm operations.

Design and layout of the scheme will need to consider and mitigate the areas of surface water flood risk.

Avoid contamination of groundwater.

EVIDENCE BASE : -

Site assessment booklet - key service centres, Hingham

https://www.gnl.org.uk/sites/gnlp/files/2021-01/Hingham%20Booklet_0.pdf

Appendix A – Tables of Allocated Sites with reasons for allocation, Key Service Centres, Hingham

https://www.gnlp.org.uk/sites/gnlp/files/2021-01/Appendix%20A%20-%20Allocated%20Sites%20KSCs_0.pdf

4. Do you consider the Local Plan is:	
Legally compliant	NO
Sound	NO
Complies with the Duty to co-operate	NO

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

GNLP0503 was submitted during the call for sites 2016. The landowners wish to withdraw the land from the plan (please see representation made by Hall Farm (Hingham) Ltd for details¹). Therefore, this site is undeliverable. Policies relating to the inclusion of GNLP0503 for development and the proposed 20 dwellings for this site are unsound.

Inclusion of GNLP0503 in the Plan is contrary to NPPF para 16c and para 67 and contradictory to GNLP Delivery Statement² (page 39) " Housing The plan promotes a pro-active approach to delivery through only allocating housing sites where a reasonable prospect of delivery, taking account of policy requirements in this plan, can be evidenced".

Without the withdrawal of GNLP0503, its inclusion within the GNLP would remain unsound and undeliverable.

Aside from the undeliverability of the site:

GNLP0503 is included for development with the caveat "Development of up to 20 dwellings would be acceptable subject to provision of a safe access and a continuous footway at the west side of Dereham Road from the site access to Pottles Alley.

As pointed out in the representation from Hingham Town Council³ during in Regulation 18C consultation (Feb/March 2020) **this is not achievable due to the constraints of highway land availability.**

"The Council do not believe that the "Provision of a continuous footway at the west side of Dereham Road from the site access to Pottles Alley" is achievable, this is demonstrated by the existing footpath on the west side of Dereham Rd terminating by number 20 Dereham Rd, before being able to recommence outside number 8 Dereham Rd."

In the Key Service Centre site summary document⁴ it has been stated that

¹ <https://www.gnlp.org.uk/regulation-19-publication-part-2-sites-5-key-service-centre-hingham-new-allocations/policy-gnlp0503>

² https://www.gnlp.org.uk/sites/gnlp/files/2021-01/Reg%2019%20final%20formatted_0.pdf

³ <https://gnlp.oc2.uk/download/attachment/2901> full submission by Hingham Town Council to regulation 18c consultation,

⁴ <https://www.gnlp.org.uk/sites/gnlp/files/2021-01/Appendix%207e%20Key-Service-Centres.pdf> (Evidence Base, Key Service Centre Booklet, Hingham)

“The Highway Authority considers the footpath issues associated with this site are capable of mitigation”.

There appears to be no supporting evidence provided by NCC Highways to substantiate this statement, (when queried with the GNLP team it was stated that evidence was ascertained through officer discussions). Furthermore, there are no developer submissions that demonstrate how it is proposed to “provide a continuous footway at the west side of Dereham Road from the site access to Pottles Alley”.

Decision to include GNLP0503 based on the “mitigation” of footpath issues are not sound as they are not justified by being based on proportionate evidence. There is also a **failing to undertake the duty to co-operate** (as this duty is ongoing), i.e the matter was not pursued with NCC Highways to provide evidence to include in the evidence base, to substantiate the comment that footpath issues can be mitigated and therefore ensure that the decision was based on proportionate evidence.

Evidence photographs and a plan which demonstrates the points where the continuous footpath would not be achievable - **SEE Evidence (1.1)**

Further concerns raised during the Regulation 18C consultation regarding the allocation of GNLP0503 as a preferred option appear to have been completely disregarded, the following concerns have not been addressed other than the sweeping statement in the Evidence Base Key Service Centre Hingham booklet⁵ “The Highway Authority considers the traffic and footpath issues associated with this site are capable of Mitigation”. **There is no evidence to support how the following concerns (raised during the Reg18C consultation) have been considered and addressed:**

“There are road safety concerns regarding additional traffic on the Dereham Road. Adherence to the 30-mph speed limit is already poor and moving the speed limit north will not mitigate this.

Between Baxter Road and Pottles Alley, many residential properties are reliant on “on street” parking, making this a “pinch point” on the road where continual 2-way traffic is prevented. This issue has more recently become more prevalent with the occurrence of daily parking on the Dereham Road, alongside the Fairland Green, from Pottles Alley to the B1108 junction.

Dereham Road is subject to heavy use by agricultural vehicles.

The site assessment suggests that “Minor carriageway widening may also be required” but does not establish at what point on Dereham Road this would occur and therefore if it would be possible.

There are already long-standing concerns regarding the B1108 Fairland Crossroads junction. Junction safety improvements are essential, to support any development in Hingham”.

Lack of consideration of representations raised regarding the allocation of GNLP0503 is contrary to the South Norfolk Council Statement of Community Involvement para 15,16 and 43⁶

⁵ <https://www.gnlp.org.uk/sites/gnlp/files/2021-01/Appendix%20e%20Key-Service-Centres.pdf> (Evidence Base, Key Service Centre Booklet, Hingham)

⁶ https://www.south-norfolk.gov.uk/sites/default/files/downloads/statement_of_community_involvement_-_amended_september_2020_1.pdf

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified at 5 above. (Please note that noncompliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

GNLP SHOULD NOT BE ADOPTED IN ITS CURRENT FORM

Removal of site GNLP0503 from the GNLP in accordance with the landowners wishes.

Removal of GNLP0503 due to undeliverability of the site due to the caveat"subject to provision of a safe access and a continuous footway at the west side of Dereham Road from the site access to Pottles Alley".

Removal of the 20 dwellings from the housing numbers specified for Hingham/Reconsider the housing numbers allocated for Hingham/Reconsult to allow for an alternative site to come forward.

Evidence (1.1) Provision of continuous footway unattainable - Photographs & PLAN

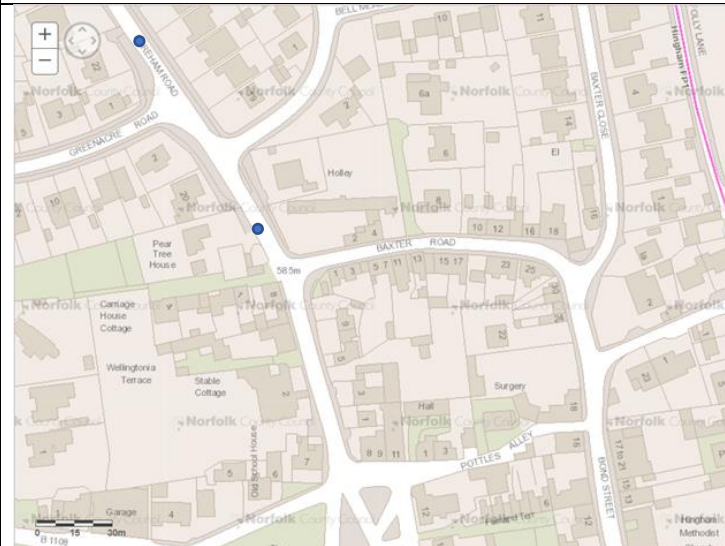
OUTSIDE NUMBER 23 DEREHAM RD



OUTSIDE NUMBER 20 DEREHAM RD



PLAN INDICATION WHERE PHOTOS WERE TAKEN



REPRESENTATION 2 PART 1

Representation

3. To which part of the Local Plan does this representation relate?

(Paragraph, table/diagram, policy, map etc)

Site specific GNLP0520

Representation regarding the inclusion in the GNLP of “Land south of Norwich Road, Hingham GNLP0520” - WITH SPECIFIC REFERENCE TO THE POLICY AS WRITTEN BELOW and with reference to Evidence Base documents:

Part 2, The Sites, Key Service Centres, Hingham

<https://www.gnlp.org.uk/regulation-19-publication-part-2-sites-5-key-service-centre-hingham-new-allocations/policy-gnlp0520>

Appendix A – Tables of Allocated Sites with reasons for allocation, Key Service Centres, Hingham

https://www.gnlp.org.uk/sites/gnlp/files/2021-01/Appendix%20A%20-%20Allocated%20Sites%20KSCs_0.pdf

Paragraph 5.39. The site boundary has been drawn to avoid areas of surface water flood risk and the most significant historic environment impacts. The site is well located on the eastern approach into the village adjacent to a site allocated in the last local plan, and will form the gateway to Hingham when approaching from the east. The allocation is subject to provision of adequate visibility splays and layout of the development to create an active frontage at B1108. Footways need to be provided at the site frontage, along with a pedestrian crossing refuge in the vicinity of Ironside Way. Consideration should also be given to connectivity with PROW Hingham F9. The site is allocated at a lower gross density than usual, as the surface water drainage area needs to be significant and the need to mitigate impact on nearby listed buildings and protect TPO trees has been taken into account. The net density will be in line with the indicative minimum in Policy 2.

Policy GNLP0520

Land south of Norwich Road, Hingham (approx. 6.92 ha) is allocated for residential development. This will accommodate approximately 80 homes. More homes may be accommodated, subject to an acceptable design and layout being achieved, and any infrastructure issues addressed.

The development will be expected to address the following specific matters:

TPO oak trees on south side of Norwich Road to be retained.

Design and layout of the site to create an active frontage along Norwich Road and show regard to the site’s gateway role.

Provision of an adequate visibility splay incorporating footways, to be provided along the whole site frontage.

Pedestrian refuge in the proximity of Ironside Way, to access local employment opportunities.

Connectivity of the site to Public Right of Way (PROW) Hingham F9.

Mitigation and further investigation with regards to the site’s susceptibility to surface water flooding.

Avoid contamination of groundwater.

Mitigation of impacts on Sea Mere SSSI

Any development must conserve and enhance the significance of Lilac Farmhouse and Blenheim Cottage to the south of the site, including any contribution made to that significance by setting. This includes but is not limited to landscaping along the southern edge of the site.

With reference to EVIDENCE BASE: -

Site assessment booklet - key service centres, Hingham

https://www.gnlp.org.uk/sites/gnlp/files/2021-01/Hingham%20Booklet_0.pdf

4. Do you consider the Local Plan is:	
Legally compliant Yes No	NO
Sound Yes No	NO
Complies with the Duty to co-operate Yes No	NO

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

Surface Water Flood Risk: During previous consultations the issue of surface water runoff from developments on the south side of Norwich Rd has been raised by residents and the Town Council through representations made during those consultations. This included representations made to the Hops development⁷ and during the previous GNLP consultations^{8 9}

(please see evidence box below for representations made by Hingham Town Council during the regulation 18c consultation REF: surface water issues - Evidence 2.1a)

There is no evidence to suggest that these representations have been given due consideration. There is no independent evidence to support that the plan as submitted by the developer for the treatment of surface water¹⁰, is suitable for the site, or will mitigate the potential issues relating to surface water drainage and run off. The Town Council are concerned that the proposals as submitted, for the surface water treatment based on filtration, swales and a highway basin, are insufficient to mitigate surface water flooding and will lead to more frequent flooding of lower lying Seamere Rd.

The site assessments seem to focus purely on the flood risk of the development site and does not take into consideration the impact that surface water from the development will have on the surrounding lower lying areas. Consideration is not given to the surface water run-off from Norwich Road, which has a poor drainage system. Residents from The Hops have indicated that they suffer from surface water run-off from Norwich Road and associated debris which block the gullies on the Hops development.

Flood mitigation needs to be proven prior to any site being allocated for development.

In the site assessment booklet (Key Service Centres, Hingham)¹¹ it states “Add policy to address surface water drainage”, the policy added is “Mitigation and further investigation with regards to the site’s susceptibility to surface water flooding” .

This does not in any way address the concerns raised from residents of lower lying Seamere Rd. The investigations should have been undertaken prior to the allocation of GNLP0520 as the designated site for development, in order to ascertain if it is indeed feasible to mitigate surface water flooding issues, not only surface water flooding within GNLP0520 but also the potential to exacerbate the existing issues with surface water and flooding within the lower lying Seamere Road area, as highlighted by both the Town Council and residents of Seamere Road.

⁷ <https://info.south-norfolk.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=NEV7000QJJY002014/2322> | Erection of 88 new homes plus associated roads and landscaping | Land South Of Norwich Road Hingham Norfolk

⁸ <https://gnlp.oc2.uk/download/attachment/2901> full submission by Hingham Town Council to regulation 18c consultation

⁹ <https://gnlp.oc2.uk/document/reps/13571>

¹⁰ <https://gnlp.oc2.uk/download/attachment/2902> submission by Bidwells on behalf of Abel Homes – see page 51

¹¹ https://www.gnlp.org.uk/sites/gnlp/files/2021-01/Hingham%20Booklet_0.pdf

Norfolk County Council has agreed additional budget allocations to deal with flooding and are planning to “Invest £2m in new funding to respond to flooding, including an additional £350,000 in revenue budget provision, £235,000 in highways spending to reduce road flooding risks and £1.5m for the creation of a new flood reserve to fund urgent works, repairs and to enable recommendations from flood investigation reports¹²”

The Norfolk Strategic Flood Alliance has recently been set up to try to find ways to limit flood risk and the impact it has on communities.

The knowledge of local residents regarding flooding issues should not be disregarded in the plan making process and representations made regarding flooding issues should carry substantial weight to ensure that plan making does not allocate sites for development that will exacerbate existing issues relating to surface water flooding and therefore increase the burden on the budgets and resources available to deal with the issue.

During the Reg18A consultation a resident made the following representation “There are very considerable surface water flooding issues already existing in Seamere Road and my own property has been flooded twice since the HIN 1 development has been ongoing. South Norfolk Council and the NCC Lead Flood Authority have been made aware of this¹³”.

The issues of flooding were again started by several residents during the Reg18C consultation. There is no evidence that further investigation has taken place with “South Norfolk Council and the NCC Lead Flood Authority” (being that they have been made aware of the issues) and this amounts to failure of Duty to Co-operate (there is no evidence that DtC has been effective or ongoing with regard to this issue).

The GNLP should now work with The Norfolk Strategic Flood Alliance, to ensure that residents experiences of flooding are used as a key factor in ensuring development is not undertaken in areas of flood risk (or cause a risk outside of the development site).

Residents have submitted their concerns to the Town Council regarding surface water flooding, by responding to a short survey and directly contacting the town council regarding this issue. **Residents have forwarded photographs and videos to be used as supporting evidence.** Please see Evidence box below: **Evidence 2.1b**. **The videos show significant amounts of water flowing down PROW footpath no.9, flooding of a garden and driveway on Seamere Road, surface water run-off from GNLP0520 and flooding of the lower part of the field.** The videos were taken during and after an occasion of sustained heavy rainfall in October 2019. **Evidence 2.1c Appendix A and B (survey responses)**

The representation from the Town Council to the Reg 18c consultations states

“Where it is clear that flood mitigation is required – such as with GNLP0520 the GNLP team should actively seek information from residents affected by or potentially affected by flooding in the vicinity of a proposed site allocation for housing development, prior to that site being approved, rather than accepting the submittance from the developers that flooding has been / can be mitigated.”

No such investigation has been undertaken.

¹² <https://www.norfolk.gov.uk/news/2021/02/budget-for-investment-and-recovery-agreed>

¹³ <https://gnlp.oc2.uk/document/reps/5133>

The representation made by residents and the Town Council have been disregarded in favour of the assumption that surface water flood risk has/will be mitigated by a reduced boundary and proposals as indicated by the developer. This demonstrates clear bias against the representations made by resident and the Town Council, who have strong local knowledge of the surface water flooding issues. The policy to allocate GNL0520 is not justified or based on proportionate evidence and therefore makes the policy/plan unsound.

In view of the concerns raised on several occasions regarding surface water and the lack of investigation into these issues with the relevant authorities amounts to a failure of Duty to Co-operate, especially taking into account the Norfolk County Council Environmental Policy¹⁴, which states:

“Using and managing land sustainably

- Creating and embedding in our strategic planning a more holistic approach to address climate change, particularly within the local planning frameworks
- Reducing risks from flooding and coastal erosion where possible
 - o Expanding the use of natural flood management solutions
 - o Putting in place more sustainable drainage systems
 - o Working to make ‘at-risk’ properties more resilient to flooding

The NPPF states “Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere”.

Allocation GNL0520 is contrary to NPPF paragraphs 155 and 158

Allocation on GNL0520 is contrary to GNL0 policy 2 .9.

“Support efficient water management. Flood risk should be minimised, including avoiding inappropriate development in areas at significant risk of flooding, reducing the causes and impacts of flooding”

Pedestrian Safety

With reference to “Pedestrian refuge in the proximity of Ironside Way, to access local employment opportunities”.

There is no evidence to support that the policy relating to the pedestrian refuge in the proximity of Ironside Way, to access local employment opportunities, is feasible or achievable. The Town Council consider that the location of the pedestrian island (as indicated in the submission by Bidwells on behalf of Abel Homes¹⁵) is dangerous, being that from the south side of Norwich Rd, it will place pedestrians behind a blind bend and on the north side of Norwich Road will put pedestrians between the 2 access points to Ironside Way industrial area. These access points to the “employment area” are already subject to frequent vehicle movements especially from extremely large HGV’s. Ironside Way will be the access point for the land allocated for further employment development (HIN2 in the GNL0) which will (when developed) increase traffic movements to an as yet unknown quantity and size.

SEE Evidence 2.1d photographs of the location of proposed pedestrian island at Ironside Way

¹⁴ <file:///C:/Users/Hingham%20Town%20Council/Downloads/Norfolk%20County%20Council%20Environmental%20Policy.pdf>

¹⁵ <https://gnlp.oc2.uk/download/attachment/2902> submission by Bidwells on behalf of Abel Homes see page 31 and page 35

(It must also be noted that other employment opportunities exist in Hingham with the Co-op and Town Centre being located to the west of GNLPO520. Pedestrian links to the towns facilities from GNLPO520 are poor as expanded upon in representation 2 part 2).

The assumption that a pedestrian refuge in proximity to Ironside Way is feasible and safe is not based on proportionate evidence therefore making the policy unsound. The policy and development of GNLPO520 does not support NPPF 8. Promoting healthy and safe communities para 91c or GNLPO policy 2.1 "SUSTAINABLE COMMUNITIES.....development proposals are required, as appropriate, to: 1. Ensure safe, convenient and sustainable access to on site and local services...."

Detrimental impact on valued landscapes

With reference to the policy "**Design and layout of the site to create an active frontage along Norwich Road and show regard to the site's gateway role**":

During the GNLPO regulation 18C consultation, Hingham Town Council raised an objection to GNLPO520 with regard to the detrimental effect that the development would have on the landscape, not only from the eastern approach to Hingham but also **the detrimental effect on the long views of Hingham from areas south of Norwich Road.**

Residents and the Town Council consider the area as highly valued landscape. GNLPO520 is at the top of the Tiffey River tributary valley. The views across GNLPO520 stretch across the valley (Seamere Rd area) to the other valley side (Deopham Rd /Money Hills Lane/Cadges Lane) area. Not only will development of GNLPO520 take away these views from the Norwich Rd, but the development will be highly visible from the surrounding areas south of the development.

The representation regarding the detrimental impact on valued landscapes, has been completely disregarded and misrepresented in the summary of consultation representations as "Impact on gateway to Hingham"¹⁶ and a policy added to call the site a "**gateway**" to Hingham.

- GNLPO Appendix 4: Plans to be superseded and plans to be carried forward¹⁷ states "Plans to be carried forward and used in conjunction with the Greater Norwich Local Plan: **South Norfolk Development Management Policies Document (2015)**"

Within the South Norfolk Development Policies Document (2015)¹⁸, the term "**gateway**" is solely used in reference to marking the 'arrival' into Norwich urban area. It is therefore wholly inappropriate and inaccurate to use the term "gateway" to justify allocation of site GNLPO520, in terms of addressing the representations made against the loss of valued landscape. Furthermore, the South Norfolk Development Management Policies Document (2015) states:

"Policy DM 4.5 Landscape Character and River Valleys. All development should respect, conserve and where possible, enhance the landscape character of its immediate and wider environment. Development proposals that would cause significant adverse impact on the distinctive landscape characteristics of an area will be refused."

The South Norfolk Development management Policies Document (2015) (page 113) also states "The South Norfolk Place-making Guide also provides guidance in

¹⁶ https://www.gnlp.org.uk/sites/gnlp/files/2021-01/Hingham%20Booklet_0.pdf page 38

¹⁷ <https://www.gnlp.org.uk/regulation-19-publication-part-1-strategy-appendices/appendix-4-plans-be-superseded-and-plans-be>

¹⁸ https://www.south-norfolk.gov.uk/sites/default/files/Development_Management_Policies_Document_0.pdf

regard to landscaping". In The South Norfolk Place-making Guide¹⁹, Hingham is identified as plateau farmland with key characteristics of "Flat plateau landform, Open elevated landscape with extensive views to and from the plateau, Churches are a significant feature within the area as well as views from the higher ground to churches outside the character area creating a strong sense of place". The key design principles include; "Ensure that new development does not adversely impact on views to churches and their settings as landmark features. Ensure that the distinctive character of Hingham is protected and enhanced. Ensure that the rural character of the road and lane network is conserved".

Allocation and development of GNLPO520 is entirely contrary the South Norfolk Development management Policies Document (2015) evidence 2.1e (photographs).

The site assessment booklet for Hingham²⁰ advises us that at stage 6 of the site assessments, Highways expressed concerns about the development of GNLPO520 with regards to highway safety, stating that measure to make the site acceptable would include "Removal of all frontage hedge, along with design of the development to present built environment to users of the B1108. Layout of the development to create an active frontage at the B1108, including access(es)/private drives towards the eastern side of the site".

Such measures are contradictory to the South Norfolk Development Management Policies (2015) document and would result in the loss of: prominent, elevated open farmland, views across valued landscape (including from PRoW footpath no.9), long views of the church from the eastern approach to the Town. Development of GNLPO520 would ensure that the current views would be replaced by a built environment, therefore destroying the rural character of the eastern/southern approach to and views of Hingham.

With reference to GNLPO520, the policy to "create an active frontage along Norwich Road and show regard to the site's gateway role" is in stark contrast to the policy in the current local plan under which The Hops was considered and the planning submissions and conditions for The Hops (HIN1).

The policy allocation of HIN1 (now developed as The Hops and positioned adjacent to GNLPO520) in the current Local Plan²¹ states "Approximately 10m landscape belts to the eastern and southern boundaries to screen the development as viewed from Seamere Road"

Development of GNLPO520 will render that policy entirely pointless as the new development would be build alongside the eastern boundary of The Hops. With the topography of site GNLPO520, being higher than The Hops, it will not be possible to screen the development as seen from Seamere Rd or the area south of Norwich Rd.

The planning submission, Design and Access statement²² for The Hops gave significant weight to the claims that The Hops development would not be intrusive to the view on the approach to Hingham, stating that "The completed development barely breaks the horizon-line of the main plateau of Hingham beyond the site". SEE Evidence 2.1f

The Design and Access statement for The Hops also states:

¹⁹ https://www.south-norfolk.gov.uk/sites/default/files/South_Norfolk_Place-Making_Guide_SPD_0.pdf page 66 and 67

²⁰ https://www.gnlp.org.uk/sites/gnlp/files/2021-01/Hingham%20Booklet_0.pdf page 27

²¹ https://www.south-norfolk.gov.uk/sites/default/files/SSAPD_Section_4_Key_Service_Centres.pdf

²² https://info.south-norfolk.gov.uk/online-applications/files/76550A49C615DB662A4F0305E658F5FB/pdf/2014_2322-DESIGN_ACCESS_STATEMENT-1187023.pdf

Pages 23-27 and page

“1.2.1 Landscape Character

According to the South Norfolk Place-Making Guide, the town of Hingham stands on the eastern edge of the Hingham Mattishall Plateau Farmland, an ‘open elevated landscape’ of rural character, with winding lanes and generally dispersed, non-nucleated settlements. Views from and towards the Plateau, particularly of its church towers are identified as a key characteristic of the area. Immediately south and east of the town, the land drops down into the Tiffey Tributary Farmland which drains eastward through Seamere to Hackford and Kimberely/Wicklewood beyond.

1.2.2 Topography/Long Views

The proposed development site is located on the slope between the Plateau and the lower Tributary Farmland, occupying the northern side of the head of a shallow valley, which runs slightly north of west towards the town. East of the site the valley swings to run slightly north of east, leaving a subtle but significant ridge running down the flank of the northern slope of the valley, just to the east of the site. The effect of this specific topography is to render the proposed development site all but invisible in the long views on the approach towards Hingham along Norwich Road, and from Seamere Road. Specifically the new development, set on falling ground west of the ridge, will have little or no effect on the long views towards the church tower set on the higher Plateau beyond. The only distant view of the site with the church tower beyond is available from the road-side verge just east of Edgefield Lodge. Farther away the site is hidden by the ridge, and closer-in any views are largely interrupted by Edgefield Lodge and then the tall hedge on the south side of Norwich Road”.

The GNLPP evidence base document, Appendix A – Tables of Allocated Sites with reasons for allocation – Key Service Centres²³, states that **GNLP0520 has been allocated (in part) as it is “adjacent to the existing allocated site” (meaning The Hops/HIN1)**

To have two completely different ethos’s toward the same landscape character (HIN1 versus GNLPP0520) is a clear indication that the policy reference to GNLPP0520 “site’s gateway role” is a poor attempt at justification of the allocation of the site and makes no attempt to address the representations raised regarding the loss of valued landscape. It demonstrates a predetermination of the site as being suitable for development on the basis that it is adjacent to HIN1/The Hops.

The policy is not based on proportionate evidence and therefore unsound.

While it is understood that any development on agricultural land will have an impact on the countryside and views, in order to comply with the South Norfolk Development Policies Document (2015) Policy 4 .5 Protection and Enhancement of Landscape Character, development within Hingham should not overbearing in its situation and design and must be wholly sensitive to the swathes of agricultural farmland that surround the town.

Allocation of GNLPP0520 (combined with the already developed HIN1/The Hops) would lead to disproportionate over urbanisation of the Eastern approach to Hingham and permanently remove the views of the distinctive landscape character of the valley and beyond and the long views of the church. The eastern approach to Hingham would become dominated by a large developed area of modern housing which would not relate positively to the character of the settlement it belongs to and not be in keeping with the built form and character of the town, in effect destroying the rural feel of this small town so often mistakenly referred to as a village. GNLPP0520 will extend the modern development along the B1108 road edge from approximately 0.16 miles to 0.32 miles.

²³ https://www.gnlp.org.uk/sites/gnlp/files/2021-01/Appendix%20A%20-%20Allocated%20Sites%20KSCs_0.pdf page 4

The allocation of GNL0520 and the policy to ensure “Design and layout of the site to create an active frontage along Norwich Road and show regard to the site’s gateway role” is contrary to the NPPF 15. Conserving and enhancing the natural environment para 170, and contrary to South Norfolk Development Policies Document (2015) Policy DM 4.5 Landscape Character and River Valleys “All development should respect, conserve and where possible, enhance the landscape character of its immediate and wider environment. Development proposals that would cause significant adverse impact on the distinctive landscape characteristics of an area will be refused”. The allocation of GNL0520 is contrary to GNL0 policy 3 ENVIRONMENTAL PROTECTION AND ENHANCEMENT

With reference to policy **“Any development must conserve and enhance the significance of Lilac Farmhouse and Blenheim Cottage to the south of the site, including any contribution made to that significance by setting. This includes but is not limited to landscaping along the southern edge of the site”.**

This policy is in direct response to representations made by Historic England during the Regulation 18C consultation. The policy merely copies the suggestion for policy wording as made by Historic England. There is no evidence of how the GNL0 policy making processes has determined **HOW** the significance of these grade 2 listed buildings can be conserved and enhanced.

Considering the fact that Lilac Farmhouse and Blenheim Cottage form part of the valley landscape and views over it from Norwich Rd, it does not appear feasible that development of GNL0520 could possibly conserve and enhance the significance of these buildings, as development would obscure them from view from Norwich Rd and due to the elevated topography of GNL0520 the development would be highly visible from the areas to the south of GNL0520, views which would also include Lilac Farmhouse and Blenheim Cottage, therefore creating an inappropriate modern housing development as a backdrop for the historic environment.

The policy is not based on proportionate evidence and therefore unsound.

Allowing development of GNL0520 would be contrary to NPPF 16. Conserving and enhancing the historic environment paragraphs 193 and 194

Development of GNL0520 is contrary to GNL0 policy 2.5. “Sustainable Communities.... development proposals are required, as appropriate, to.....Respect, protect and enhance local character and aesthetic quality (including landscape, townscape, and the historic environment).

Proposing GNL0520 for inclusion in the GNL0 as land for development is contrary to The South Norfolk Development management Policies Document (2015) - Policy DM 4.10 Heritage Assets²⁴

“All development proposals must have regard to the historic environment and take account of the contribution which heritage assets make to the significance of an area and its sense of place, as defined by reference to the national and local evidence base relating to heritage.

Proposals must show how the significance of the heritage asset has been assessed and taken into account by reference to the Historic Environment Record, suitable expertise and other evidence/research as may be necessary. Considerable importance and weight must be given to the desirability of preserving listed buildings, their settings and the character and appearance of conservation areas”.

In allocating GNL0520 as the preferred option in the Regulation 18C consultation, there is NO policy reference made to the historic environment or the impact on the landscape. These issues which are clearly defined in the NPPF and the South Norfolk Development management Policies Document (2015) had not been given adequate consideration in the site selection process.

²⁴ https://www.south-norfolk.gov.uk/sites/default/files/Development_Management_Policies_Document_0.pdf pages 123 and 124

TPO Trees and Highway access

With reference to Policy wording “**TPO oak trees on south side of Norwich Road to be retained**” and “**Provision of an adequate visibility splay incorporating footways, to be provided along the whole site frontage**”.

During the site assessment process comments from raise concerns regarding access to GNLPO520. Highways comments in the site assessment were: “Not feasible to achieve safe access due to presence of TPO protected trees. Comments revisited: The ability to provide access visibility splays is limited by the presence of TPO protected trees at the site frontage”

.... Allocation of GNLPO520 will be acceptable subject to: • Provision of access with visibility splays of minimum dimensions of 2.4m x 90m including hedge removal and if required lowering of the verge, as indicatively shown on drawing number 48851-PP-SK11 Rev A.27 • Removal of all frontage hedge, along with design of the development to present built environment to users of the B1108.”²⁵

As the GNLPO has justified the allocation of GNLPO520 based on it being adjacent to HIN1/The Hops, references to the removal of the northern hedgerow **again highlights the contradictory nature of the proposals for development on Norwich Road and the contradictions between the GNLPO and The South Norfolk Development management Policies Document (2015)**. It must be noted that the northern boundary hedge “to be removed” on GNLPO520 is the hedge that is identified in the Design and Access Statement for The Hops as integral to ensuring The Hops is largely obscured from view on the approach to Hingham. Furthermore, during the planning process for The Hops it was determined²⁶ that the hedge that borders the HIN1 site to the north (along Norwich Road), is classified as protected and important under The Hedgerows Regulations 1997, the document ‘AN ARCHAEOLOGICAL DESK-BASED ASSESSMENT (Focussing on Hedgerows)’²⁷ also highlights the importance and age of the northern hedge line: “Cartographic sources illustrate that the northern boundary of the site abutting the road remains completely unchanged since at least 1766, indicating the line of the hedgerow boundary was well-established prior to the process of the Enclosure or Tithe Commutation Acts of the early to mid-19th century, therefore may have its origins in medieval agricultural landscape” the assessment also states that the “eastern half will be retained and enhanced to preserve the leafy character of Norwich Road as it approaches Hingham”.

With specific reference to GNLPO520, the northern boundary hedge follows the same line along the Norwich Road, and is therefore likely to be of the same importance and also be classified as protected and ‘important’ under The Hedgerows Regulations 1997. No regard has been given to the ‘protected and important’ status of the hedge and any policy which requires its removal in order to be implemented is unsound and contrary to **The South Norfolk Development management Policies Document (2015) - Policy**

²⁵ https://www.gnlp.org.uk/sites/gnlp/files/2021-01/Hingham%20Booklet_0.pdf page 26

²⁶ https://info.south-norfolk.gov.uk/online-applications/files/2BF9F459FCAFA37DA840214BAE0EA3EB/pdf/2014_2322-ADDITIONAL_LANDSCAPE_OFFICER_COMMENTS-1220413.pdf

²⁷ https://info.south-norfolk.gov.uk/online-applications/files/6AEF2B8593D7A98FE4C7C68E5A61965E/pdf/2014_2322-ARCHAEOLOGY_INFORMATION_FOCUSED_ON_HEDGEROWS-1220396.pdf

DM 4.8 Protection of Trees and Hedgerows states “The Council will presume in favour of the retention of ‘important’ hedgerows as defined by the Hedgerows Regulations 1997”.

It must be noted that in early 2019 the northern hedge at GNL0520, (bordering Norwich Road), was partially removed. The issue was reported to South Norfolk Council in March 2019, but no action was taken. The hedge should be reinstated, and any further removal of the hedge should not be permitted.

With regard to the TPO tree on the northern boundary of GNL0520, there is no evidence of certainty that these trees can be retained in creating an access to the proposed development. The tree root protection area, as stipulated in drawing referred to by Highways²⁸, butts up to the edge of the proposed access. However, no regard has been given to the protection of these trees during the development of GNL0520, when the access will be subject to significant heavy commercial vehicle movements.

It is unsound to allocate GNL0520 requiring “Provision of an adequate visibility splay incorporating footways, to be provided along the whole site frontage”, as this is contradictory to the policy “TPO oak trees on south side of Norwich Road to be retained”, in the absence of confirming evidence that the trees can be retained (other than that as produced by the developer). (Please see representation raised during the Regulation 18C consultation²⁹ for further concerns regarding the presence of TPO trees in relation to development of The Hops and the inability to provide a second pedestrian refuge (due to the presence of the TPO trees), as was a condition of planning consent³⁰ There also appears to be no forward planning or provision to establish replacements for the TPO trees, for when in future times they are no longer viable. The proposed removal of the hedgerow and non-evidenced protection of the TPO trees is contrary to the NCC Environmental Policy and also the NCC aspirations to plant 1million trees in Norfolk³¹ (including reintroducing trees within hedgerows).

²⁸ <https://gnlp.oc2.uk/download/attachment/2902> page 31

²⁹ <https://gnlp.oc2.uk/download/attachment/2901> full submission by Hingham Town Council to regulation 18c consultation

³⁰ [2015/1675 | Variation of condition 2 - amended plans and removal of condition 9 - Eastern pedestrian refuge and electronic sign of permission 2014/2322/F - Erection of 88 new homes plus associated roads and landscaping. | Land South Of Norwich Road Hingham Norfolk \(south-norfolk.gov.uk\)](https://www.south-norfolk.gov.uk/2015/1675-variation-of-condition-2-amended-plans-and-removal-of-condition-9-eastern-pedestrian-refuge-and-electronic-sign-of-permission-2014/2322/f-erection-of-88-new-homes-plus-associated-roads-and-landscaping-land-south-of-norwich-road-hingham-norfolk)

³¹ <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/campaigns/1-million-trees-for-norfolk>

REPRESENTATION 2 PART 2

Representation

3. To which part of the Local Plan does this representation relate? (Paragraph, table/diagram, policy, map etc)

Site specific GNLP0520 Representation regarding the inclusion in the GNLP of Land south of Norwich Road, Hingham GNLP0520

Part 2, The Sites, Key Service Centres, Hingham

<https://www.gnlp.org.uk/regulation-19-publication-part-2-sites-5-key-service-centre-hingham-new-allocations/policy-gnlp0520>

With reference to EVIDENCE BASE: -

Site assessment booklet - key service centres, Hingham

https://www.gnlp.org.uk/sites/gnlp/files/2021-01/Hingham%20Booklet_0.pdf

Appendix A – Tables of Allocated Sites with reasons for allocation, Key Service Centres, Hingham

https://www.gnlp.org.uk/sites/gnlp/files/2021-01/Appendix%20A%20-%20Allocated%20Sites%20KSCs_0.pdf

4. Do you consider the Local Plan is:

Legally compliant : No

Sound : No

Complies with the Duty to co-operate : No

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

Pedestrian links to the Towns facilities:

During the regulation 18C consultation concerns were raised regarding the poor pedestrian access to the Town's facilities from the south side of Norwich Rd. This affects residents from the existing development "The Hops". Further development on the south side of Norwich Road would be subject to the same issues. The key points raised in the Town Councils Reg 18c representation are summarised as evidence below (evidence 2.2a).

There is no evidence to suggest that these representations have been given due consideration. These matters have not been adequately represented or responded to within the 'Summary of Representations' document³².

³² https://www.gnlp.org.uk/sites/gnlp/files/2021-01/Hingham%20Booklet_0.pdf

Hingham is generally constrained by narrow footways in several locations, and there is an absence of footway between The Hops and Bears Lane on the southern side of Norwich Road. There is a complete failure to recognise the challenges for pedestrians in reaching the Town centre shops and nearby services from GNLP0520. For example, from the existing Hops development, in order to reach the Library, Bowls Club and Lincoln ("village") Hall, **the B1108 must be crossed 4 times** (to avoid the extremely narrow footway alongside the boundary wall to Beaconsfield House). The B1108 has to be crossed 3 times to reach the Chemist, White Hart pub and sports centre on Watton Road. These challenges become particularly acute for pedestrians with prams/young children those in wheelchairs/mobility scooters and pedestrians with disabilities such as visual and mobility impairment.

The Equalities Impact Assessment³³ states: "Disability: The range of potential disabilities may result in a wide range of physical limitations. Of these, due to the strategic nature of local plan policies, the disability which a local plan has the most opportunity to address is limited mobility. The GNLP has a range of policies which aim to improve access to services for all residents, seeks a percentage of adaptive homes, encourages use of Building for a Healthy Life, and requires a Health Impact Assessment for some schemes".

The assumption in the Equalities Impact Statement that site GNLP0520 will not pose a negative impact on any of its residents is incorrect. The location of the site does not provide good access to existing facilities within the town.

It is noted that the Bidwells submission in support of GNLP0520³⁴ includes a zebra crossing to the west of Bears Lane, in acknowledgement that pedestrians from The Hops have to cross the road twice just to get to the Co-op. The safety of this proposal is highly questionable, as pedestrians on the South side of the road would not be visible to, or easily be able to see oncoming traffic, due to the presence of the hedge between The Hops and Bears Lane.

Page 25 of the Bidwells submission states:

"pedestrians will have the option to cross Norwich Road, to the northern side of Norwich Road, or walk through the neighbouring residential site, to access the pedestrian refuge crossing point from The Hops site. This will allow sufficient access to the local facilities and bus stops within Hingham, not only encouraging more individuals from the new development to walk to access these facilities, but also making public transport more accessible to individuals".

The Town Council have on several occasions raised concerns with Norfolk County Council highways regarding the safety of the existing pedestrian island as there is poor visibility (crossing from The Hops) due to the existing hedge between The Hops and Bears Lane. It is often difficult to see if vehicles are approaching on the wrong side of the carriage way, to overtake parked vehicles on the north side of the road in the vicinity of the pedestrian island.

Directing residents of the new proposed development through The Hops to access the existing pedestrian refuge would direct them via side roads within The Hops that have no pavements. There are cars parked on the carriageway in the side roads of the Hops on a regular basis, forcing pedestrians (including those with prams/young children, those in wheelchairs/mobility scooters and pedestrians with disabilities such as visual and mobility impairment) to have to walk in the middle of the road.

³³ https://www.gnlp.org.uk/sites/gnlp/files/2021-01/EqIA_Reg19_Final.pdf

³⁴ <https://gnlp.oc2.uk/download/attachment/2902> submission by Bidwells on behalf of Abel Homes see page 35

SEE evidence 2.2b Photographs

Please see evidence 2.2c / Appendix B residents of The Hops responding to a survey which included issues regarding pedestrian safety and access to facilities.

In view of the concerns raised directly to Norfolk County Council, on several occasions regarding pedestrian safety and the lack of investigation into these issues with the relevant authorities amounts to a failure of Duty to Co-operate.

With regard to the Highway comment that pedestrian safety concerns can be mitigated there is no evidence to support this, or that the information and proposals as provided by the developer, regarding pedestrian access to facilities are feasible. Any decision to include GNL0520 for development based on this criteria is not based on proportionate evidence, therefore making the policy/plan unsound.

Allocating GNL0520 is contrary to the GNL0 policy 2 "Sustainable Communities" .” Developments are required to provide convenient, safe and sustainable access to new on-site services and facilities or to existing facilities as appropriate. This reduces the need to travel and provides local access to services and facilities, supporting their viability. The provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling also helps to support healthy lifestyles. In this respect, regard should be had to Sport England’s Active Design document “

Development of GNL0520 does not support NPPF 7. Ensuring the vitality of town centres - para 85f.

Development of GNL0520 does not support NPPF 8. Promoting healthy and safe communities para 91c

Close proximity to the Industrial area –

During the regulation 18C consultation concerns were raised regarding the allocation of GNL0520 for residential development, with regards to its very close proximity to the Industrial Estate area.

There is no evidence to suggest that these representations have been given due consideration. These matters have not been adequately represented or responded to within the summary of representations document.³⁵

GNL0520 is opposite a mixed industrial estate. HIN2 is land that was allocated under the current Joint Core Strategy/South Norfolk Local Plan as an extension to the existing industrial/employment area in order to support the development allocation of HIN1 (for approximately 95 dwellings). As yet HIN2 remains undeveloped there are no timescales for this area being developed to increase employment opportunities, the GNL0 states that “it is expected that development will take place within the new local plan time-period”.

It is noted that the HIN2 is allocated for Classes E(g)/B2/B8 as an extension to the existing industrial estate.

E(g) Uses which can be carried out in a residential area without detriment to its amenity

B2 General industrial - Use for industrial process other than one falling within class E(g) (previously class B1) (excluding incineration purposes, chemical treatment or landfill or hazardous waste)

B8 Storage or distribution - This class includes open air storage

³⁵ https://www.gnlp.org.uk/sites/gnlp/files/2021-01/Hingham%20Booklet_0.pdf

GNLPO520 will put residential properties within close proximity to the frontage of the existing industrial area having a B2 category. It is of concern that this would have a detrimental effect on the residential amenity, for example noise pollution (due to there being no barriers to prevent noise traveling forward toward GNLPO520) and increased heavy commercial traffic.

The Policy for development of HIN2 includes a requirement for “Local road improvements and a safe access with road access to the site from the existing industrial estate at Ironside Way”.

When HIN2 employment/industrial area is developed, there will be a resulting increase in heavy commercial traffic, already the access points to the industrial area are subject to movements from substantially sized HGVs. Allocation GNLPO520 for residential development would limit the ability for “local road improvements” to support the development of HIN2, therefore the allocation GNLPO520 and its associated policy to provide a “pedestrian refuge in the proximity of Ironside Way, to access local employment opportunities”, is conflicted with the policy HIN2 and its requirement for local road improvements. **Therefore, making the plan unsound.**

GNLPO520 as a residential area could affect the sustainability of this employment area. GNLPO520’s proximity to HIN2 may result in limiting conditions applied (to use of HIN2) through the planning application process. This may curtail business hours and activities, in order to prevent nuisance to residents opposite, therefore making HIN2/the industrial area less desirable to investors.

The existence of HIN2 should be a key factor in deeming GNLPO520 as unsuitable for housing development due to the close proximity of the 2 sites and access to them within a short distance on the same busy road.

Allocating GNLPO520 and its associated policy requirement for a pedestrian island at Ironside Way is contrary to GNLP POLICY 6 - THE ECONOMY “Sufficient employment land is allocated in accessible locations to meet identified need and provide for choice. Opportunities for sustainable access to sites should be maximised through development proposals and infrastructure investment”. (GNLPO520 policy may make the access to HIN2 unsustainable for expansion of the industrial area).

Allocating GNLPO520 is contrary to NPPF 6 Building a strong, competitive economy:

“80. Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development”...

GNLP Policy 1 The Sustainable Growth Strategy

Para 165 “This local plan also provides a “direction of travel” for the longer term by identifying opportunities for growth which could be taken forward to meet additional needs in the next local plan “.

During the regulation 18C consultation concerns were raised regarding future development in Hingham. There is no evidence to suggest that these representations have been given due consideration. These matters have not been adequately represented or responded to within the summary of representations document. The site assessment document stated that “GNLP0310 (Approx. 172 dwellings) is not considered to be suitable for allocation at the current time as it would need to be developed in conjunction with or following site GNLPO520 otherwise development would be separate from the existing built form of the settlement”.

Allowing GNLPO520 to be developed will then open up the potential for GNLPO310 to be developed in the future. A development in this location would further exacerbate all of the issues raised in regard to GNLPO520, Development of GNLPO310 is also vehemently opposed.

If GNLPO520 is being allocated so as to facilitate development of GNLPO310, **this is not transparent and clarification on this point is required**. If it is the intention to pursue GNLPO310 in future plans, this should be clearly identified within the GNLPO. No “direction of travel”, long term opportunities for growth have been identified (for Hingham), however the allocation of GNLPO520 has clear implications for the future consideration of GNLPO310.

With regards to representation 2, parts 1 and 2

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified at 5 above. (Please note that noncompliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

GNLPO SHOULD NOT BE ADOPTED IN ITS CURRENT FORM

Removal of site GNLPO503 from the GNLPO in accordance with the landowners wishes.

Removal of GNLPO503 due to undeliverability of the site due to the caveat ...” subject to provision of a safe access and a continuous footway at the west side of Dereham Road from the site access to Pottles Alley”.

Removal of the 20 dwellings from the housing numbers specified for Hingham/Reconsider the housing numbers allocated for Hingham/Reconsult to allow for an alternative site to come forward.

AND

GNLPO SHOULD NOT BE ADOPTED

Proper regard should be given to the representations made in opposition to GNLPO520 being allocated for development, especially with regard to flooding issues, potential impact on historical heritage, the protection of valued landscape, the adequacy of footway links and proximity to ALL of the town’s facilities.

GNLPO520 should be removed from the plan.

Reconsider the housing numbers allocated for Hingham/Reconsult to allow for an alternative site to come forward and for representations to be made.

Consideration **MUST** be given to if a site would provide a benefit alongside the proposed housing development, and if it would enable opportunity to achieve the aspirations of the community/town council for “future proofing” Hingham to be able to provide facilities to a growing community.

Allocations of any sites should be based on firm evidence that proposals made in order to mitigate, are actually feasible and achievable.

Evidence

Evidence 2.1 a

Ref: surface water

Hingham Town Council representation submitted during Reg18C consultation

Many of the concerns raised in relation to the development of GNLPO520 also have regard to the newly built Hops development (ref HIN1) and that development of GNLPO520 would further exacerbate the existing and/or give rise to similar issues.

These issues are predominately surface water and flooding concerns, a lack of adequate pedestrian links to the town centre, road safety and a permanent detrimental visual impact on the approach to the Hingham which is a Historic Town with a substantially sized conservation areas and many listed buildings.

Flooding – residents on The Hops have stated that there is inadequate surface water drainage on the estate and surface water run-off from the B1108 is substantial during heavy rainfall. Residents at the southern end of the development have advised that there are issues with damp in their homes and waterlogging of gardens.

Residents on the lower lying Seamere Road and Mill Corner (which is within the conservation area), raised concerns regarding flooding prior to the Hops being built. The surface water drainage system from the Hops development requires the co-operation of three private landowners and two public bodies to co-ordinate and manage its maintenance, the Lead Flood Authority does not consider this to be its responsibility. Surface water from The Hops is attenuated into a pond which then flows into the ditch system. Insufficient time has elapsed to establish if flooding concerns have been mitigated, as overtime the pond and ditch system will become silted and overgrown, and it had already proven difficult to secure any satisfactory maintenance of this drainage system due to multiple responsibilities for maintenance i.e the system is the responsibility of several bodies/individuals (NCC Highways, 3 private landowners and Anglian Water).

Residents south of The Hops were told that the new system would improve the situation in Seamere Road, but this has not happened since all water from Norwich Road, Ringers Lane, Bears Lane, Bears Close and Drinkwater Close, together with that from the Hops, ends up in the roadside ditches in Seamere Road between Mill Corner and the bottom of the footpath.

It is also of concern that the agricultural land to the south of The Hops is now becoming waterlogged, low yielding and unfarmable – a resident has commented “the land is very wet, we got flooded last year we lost the surface of the track too, A Resident has dug the ditch out behind us and we have replaced the pipe under the footpath /bridge with a much bigger pipe, A resident in the front row of cottages got flooded too,. Crop is growing in the field, but field is very wet”.

The site assessment states “GNLPO520: This site is proposed for allocation on a reduced boundary to avoid areas of surface water flood risk and historic environment impacts”. Allocating GNLPO520 on a reduced boundary than initially put forward does not prove mitigation water flooding concerns and/or concerns over the impact of surface water run off on the lower lying Seamere Rd/Mill Corner now and over time. The site assessment, with reference to flooding, advised – “Mitigation required for heavy constraints”. Where it is clear that flood mitigation is required – such as with GNLPO520 the GNLPO of surface team should actively seek information from residents affected by or potentially affected by flooding in the vicinity of a proposed site allocation for housing development, prior to that site being approved, rather than accepting the submittance from the developers that flooding has been / can be mitigated.

Evidence 2.1b

Ref: surface water

PHOTOGRAPHS TAKEN FROM PUBLIC RIGHT OF WAY FOOTPATH NO.9 DURING A SPELL OF PROLONGED RAINFALL (FEBRUARY 2021)
THE DITCH BETWEEN GNL0520 AND THE HOPS WAS FULL AND WATER WAS FLOWING INTO THE FIELD BELOW THE HOPS



PHOTOGRAPHS SUBMITTED BY RESIDENTS, OF FLOODING DURING A PERIOD OF SIGNIFICANT RAINFALL (OCTOBER 2019)

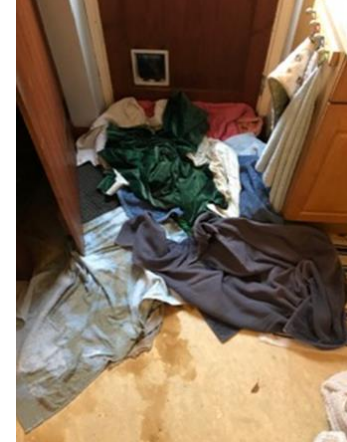
Seamere Rd garden flooding



Seamere Rd driveway flooding



Seamere Rd house flooding



Non flooded garden for comparison



Non flooded driveway for comparison



PLEASE SEE VIDEOS ON THE HINGHAM TOWN COUNCIL WEBSITE – GREATER NORWICH LOCAL PLAN SUBMISSIONS PAGE

2. Flooded Garden Seamere Rd IMG_1190 (3)

https://hinghamtowncouncil.norfolkparishes.gov.uk/files/2021/03/IMG_1190-3.mov

FLOODED GARDEN SEAMERE RD OCTOBER 2019

Resident's statement "Video of water pouring through the back garden from the farm, which had water pouring from the field into it. It's worth noting the houses on Seamere are built at a lower level than the fields, as you can

see it was like a river coming across the back garden and hitting my back door, it then gushed round the side on the house and down the drive. What I don't have footage of is that it also completely flooded the garage at the side"

FLOODING OF THE SOUH OF THE FIELD GNLP0520 WHERE THE HIGHWAY BASIN IS PROPOSED - SCREENSHOTS BELOW TAKEN FROM VIDEO SUBMITTED BY A RESIDENT

PLEASE SEE VIDEO ON THE HINGHAM TOWN COUNCIL WEBSITE – GREATER NORWICH LOCAL PLAN SUBMISSIONS PAGE

<https://hinghamtowncouncil.norfolkparishes.gov.uk/gallery/>

VIDEOS 4, 5 AND 6 SHOW SURFACE WATER RUN OFF FROM GNLP0520 AND FLOODING OF THE BOTTOM OF THE FIELD

OCTOBER 2019



SCREENSHOTS BELOW TAKEN FROM VIDEO SUBMITTED BY A RESIDENT - SHOWING WATER RUN OFF FROM GNLPO520, OCTOBER 2019

PLEASE SEE VIDEO ON THE HINGHAM TOWN COUNCIL WEBSITE – GREATER NORWICH LOCAL PLAN SUBMISSIONS PAGE

3. Water run-off from GNLPO520 Flooding the track off Seamere Rd which forms part of PRow footpath no 9 IMG_1849-1

<https://inghamtowncouncil.norfolkparishes.gov.uk/gallery/>



RESIDENTS PHOTOGRAPHS (THE HOPS) SHOWING RAINWATER RUNNING OFF THE NORWICH ROAD USING THE DROPPED KERB TO FAST FLOW DOWN THE FOOTPATH JUNE 2018



Evidence 2.1 c
Ref surface water
Residents' testimonials

SEE:
Appendix A - survey responses from Seamere Rd
Appendix B - survey responses from The Hops

Evidence 2.1d
Pedestrian Safety –

PHOTOGRAPHS OF THE LOCATION OF PROPOSED PEDESTRIAN ISLAND AT IRONSIDE WAY

Long view of the location showing proximity to the bend



Shorter view showing the limited length between the 2 access points to Ironside Way/Industrial area



Evidence 2.1e VIEWS ACROSS VALUE LANDSCAPE

Picture (s) A - Taken from Money Hill, yellow dots showing location of GNLP0520 and how it would dominate the landscape views. The industrial area is visible but the low roofs do not make it overly dominant .



Picture (s) B – Taken from Deopham Road



Pictures C and D taken from Norwich Rd, showing views across the landscape towards locations A and B , including the setting of Blenheim Cottage and Lilac Farmhouse
Picture C shows Hill House on Money Hill (indicated by a yellow dot), Picture D shows the location of The Water Mill on Deopham Rd (yellow dot) and Lilac Far House (green dot)



Plan showing locations of where the photographs were taken and the long view lines from those locations.



Norwich Road approach to Hingham showing the just visible rooflines of The Hops, and the church in the background. GNLPO520 as housing development would entirely dominate this view.



Evidence 2.1f TAKEN FROM DESIGN AND ACCESS STATEMENT FOR THE HOPS (PLANNING APPLICATION 2014/2322

Below: Closer still, the hedge and mature oaks allow only glimpses of the site; the church tower is now obscured behind the trees on Norwich Road.



Below: The completed development barely breaks the horizon-line of the main plateau of Hingham beyond the site



IMAGES FROM GOOGLE SHOWING THE HEDGE PROVIDING A SHIELDED VIEW OF THE HOPS AS WAS INTENDED. UNFORTUNATLEY THE HEDGE HAS SINCE BEEN PARTIALLY REMOVED, THIS WAS REPORTED TO SOUTH NORFOLK COUNCIL IN MARCH 2019 AND NO ACTION HAS BEEN TAKEN.



Evidence 2.2a

Pedestrian access to facilities (Hingham Town Council Reg 18c representation)

Inadequate pedestrian links to the town centre - It has already been noted in the site assessment that children would have to cross the B1108 to access a footway to enable them to walk to the primary school. When The Hops was built, adequate provision for pedestrians to walk from the development to the Town Centre (the Market Place) and beyond was not achieved and no pedestrian **priority** crossing point was provided.

A section of footway between The Hops and Bears Lane could not be, provided due to land ownership.

A pedestrian refuge was provided (at the point where the footway ends outside The Hops at the western end), in theory to assist residents of The Hops to cross the B1108, however there is poor visibility (crossing from The Hops) due to the existing hedge between The Hops and Bears Lane and it is often difficult to see if vehicles are approaching on the wrong side of the carriage way, to overtake parked vehicles on the north side of the road in the vicinity of the pedestrian island. The existing danger due to the crossing point not having pedestrian priority and the lack of visibility to the left is more acute for (those such as) wheelchair users, pedestrians with children and pushchairs due to them naturally not being able to stand on the kerb edge to look for oncoming traffic.

The lack of a section of footway between The Hops and Bears Lane means that pedestrians have to cross the B1108 to access the footway alongside the B1108 to then walk toward the centre of Hingham. Pedestrians have to cross the B1108 a second time to access the Co-op shop, cross the B1108 3 times to access the Pharmacy/businesses on Bond Street and The Fairland (due to the very narrow footway by Beaconsfield House) and cross the B1108 4 times to access the Lincoln (“village”) Hall and Library. This lack of adequate pedestrian links into the centre of town, may discourage residents at GNLPO520 from walking to and using the small independent businesses within the Town centre. Other sites in Hingham on the B1108, assessed during the GNLPO process have been deemed unsuitable due to lack of adequate pedestrian provision (GNLPO298, GNLPO335), yet GNLPO520 has been deemed suitable (and the Hops has been built) without the provision of an adequate pedestrian link into the centre of Hingham. There is a clear inconsistency and contradiction demonstrated in the site assessment process.

There is NO point on the B1108 (or anywhere in Hingham) where priority is given to pedestrians crossing the road, this needs to be rectified. Development of GNLPO520 would be contrary to GNLPO policy 2 “1. Access to services and facilities - Developments are required to provide convenient, safe and sustainable access to new on-site services and facilities or to existing facilities as appropriate. This reduces the need to travel and provides local access to services and facilities, supporting their viability”.

Evidence 2.2b

Pedestrian Safety/Pedestrian links to facilities

PHOTOGRAPH TAKEN FROM THE EDGE OF THE TACTILE PAVING ON THE SOUTH SIDE OF NORWICH ROAD EXISTING PEDESTRIAN REFUGE (SHOWING THE HEDGE IN A "WINTER STATE")



PHOTOGRAPH TAKEN FROM THE SOUTH SIDE OF NORWICH STREET AT THE LOCATION OF THE PROPOSED ZEBRA CROSSING (SHOWING THE HEDGE FROM THE WEST OF BEARS LANE)



EXTREMELY NARROW FOOTWAY AT BEACONSFIELD HOUSE, NORWICH STREET



CARS PARKED IN THE SIDE ROAD GRANARY WAY, THE HOPS. PREVENTING A SAFE WALKING ROUTE DUE TO NO PAVEMENT



REPRESENTATION 3

Representation

3. To which part of the Local Plan does this representation relate? (Paragraph, table/diagram, policy, map etc)

With regard to the site selection process:

The rejection of sites as reasonable alternatives, therefore no reasonable alternatives were put forward for the Regulation 18c consultation.

Evidence Base Site assessment booklet - key service centres, Hingham

https://www.gnlp.org.uk/sites/gnlp/files/2021-01/Hingham%20Booklet_0.pdf

Appendix B – Tables of Unallocated Sites with reasons for rejection

[Appendix B - Unallocated sites KSCs_0.pdf \(gnlp.org.uk\)](#)

4. Do you consider the Local Plan is:

Legally compliant	NO
Sound	NO
Complies with the Duty to co-operate	NO

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

During the regulation 18C consultation a comprehensive submission was made by Hingham Town Council³⁶ raising objection some sites being deemed as unsuitable for development and not being put forward for consultation as reasonable alternatives. With specific reference to the site assessments, the Town Council consider that there are a number of contradictions within the site assessments, the conclusion of sites put forward for housing development and the decisions on some sites to be deemed unsuitable, are extremely flawed and not based on proportionate evidence.

Of the sites consulted on during the Regulation 18C consultation, as previously stated the Town Council and residents consider GNLP0520 unsuitable for development and objections were made against the site as a preferred option. Objections were also made against the following sites being deemed unsuitable and not being put forward for consultation as “reasonable alternatives”: GNLP0298 and GNLP 0335, GNLP0501 and GNLP0502.

The Town Council in their regulation 18C representation expressed that these options should be further explored. With regard to GNLP0501 and 0502 there was a potential for community benefit, if additional land for the sports centre could have been incorporated with highway access being achievable via land owned by

³⁶ <https://gnlp.oc2.uk/download/attachment/2901> full submission by Hingham Town Council to regulation 18c consultation

the Town Council. It is understood that the landowner is not pursuing development of GNLPO501 and GNLPO502 at this time, therefore this representation will not make further reference to these sites.

With regard to GNLPO298 and GNLPO335 (the same developer is promoting both sites), although housing numbers proposed are a concern, the development of these sites would offer the future community benefit of a community woodland and the access link to land which could have a potential to help achieve the aspirations of the community and Town Council by providing an area of land (GNLPO395) which could be utilised for improving Hingham's infrastructure/facilities. It is recognised that any development on agricultural land will have an initial negative impact on biodiversity and wildlife. NPPF 174b states plans should "pursue opportunities for securing measurable net gains for biodiversity". The allocation of GNLPO520 and GNLPO503, when judged against the proposal of delivering a community woodland in conjunction with GNLPO298 and GNLPO335, is contrary to NPPF para 174b.

As already demonstrated the Town Council consider the allocation of GNLPO520 and GNLPO503 in the GNLPO to be unsound, and therefore the GNLPO should not be adopted with the inclusion of either site.

Due to the GNLPO rejection of other sites promoted, no other sites in Hingham have been subject to public consultation as reasonable alternatives/sites with the potential for being developed. Therefore, residents have not made their views known via the consultation process in relation to the potential of GNLPO298 and GNLPO335 as housing allocation. Of the sites submitted (and remaining available) GNLPO298 and GNLPO335 would appear to offer an alternative to GNLPO520, however residents views, such as submitted to the Town Council (evidence 3a) should be sought.

The GNLPO is not justified, it has not fully taken into account reasonable alternatives and the decisions to include GNLPO520 /GNLPO503 and reject alternatives sites is not based on proportionate evidence.

With regard to the HELAA COMPARISON TABLE³⁷ /HELAA Assessment. The desktop analysis is a poor tool for identifying the reality of a sites constraints and does not prove to have resulted in an objective or accurate assessment, for example:

GNLPO520 scores green on Significant Landscapes where as GNLPO298 scores Amber

GNLPO520 would in reality have a much greater detrimental impact on valued landscape on the approach to Hingham that GNLPO298, although it is noted that development of GNLPO335 would have an impact on the landscape views for existing residents on the south side of Watton Road and Rectory Road.

Both GNLPO520 and GNLPO298 score green on flood risk, however it is noted at stage 4 of the site assessments, regarding GNLPO520 "Approximately a quarter of the site is subject to surface water flood risk which is likely to affect the developable area and in particular may preclude housing on the southern part of the site". Whereas with GNLPO298 "A very small part of the south west corner is covered by surface water flood risk but this is unlikely to affect the developable area".

³⁷ https://www.gnlp.org.uk/sites/gnlp/files/2021-01/Hingham%20Booklet_0.pdf

Moving to the stage 4 assessment which states:

GNLP0520 A continuous footpath route to Hingham Primary School currently exists from the Norwich Road side of the site, although children would have to cross the B1108 to access it.

GNLP0298 The site is considered to be a reasonable alternative as there is a pedestrian route to Hingham Primary School although this would require crossing the B1108 to get to the existing footway.

BOTH GNLP0520 and GNLP0298 would require pedestrians to cross the B1108 to access a footway route to the shops, school, Dr's surgery and other facilities within Hingham.

The site assessment booklets (stage 7) states with reference to GNLP0298: "This site is not considered to be suitable for allocation as development here would extend the settlement further west along the B1108. It is not possible to get an adequate footway link from the site into Hingham Town centre".

It should be noted that GNLP0298 would not extend the settlement any further west than GNLP0520 would extend the settlement to the east. Both sites would see an extension of the settlement in terms of residential expansion in the immediate vicinity, of a comparable length. It must also be noted that the parish boundary is further to the west of GNLP0298 (with 0335) than the parish boundary is east of GNLP0520 (see evidence 3b). Between the sites of GNLP0298 (with 0335) and the western parish boundary there is the residential area of Frost Row.

It should also be noted that information has been provided to the GNLP by the developer promoting GNLP0298 (with 0335) suggesting that the provision of a footway link to Hingham Town Centre is feasible. It is considered that this footway link would be more adequate than the footway link from GNLP0520 (Norwich Road) although the need for a pedestrian priority crossing point would need to be addressed.

Hingham Town Council made enquiries with the GNLP team to ascertain why Highways had deemed that it was not possible to get an adequate footway link from GNLP0298. The highway response advised:

"(GNLP0298 / GNLP0335) are situated beyond the western extent of the Hingham built area and within a 40mph speed limit. The approach to the site is essentially from open countryside with little in the way of visual clues that drivers should attenuate their speed. The proposed retention of frontage hedging would result in the highway environment and therefore, driver behaviours being unchanged."

The highway description of the approach to Hingham from the west is not an accurate representation of the environment. The approach to Hingham from the west is through 40mph limit and passes both countryside and the Frost Row area of Hingham, the immediate approach to GNLP0298 is flanked on the left by a pavement and tall hedge screening the sports field with views of the residential environment ahead. (See Evidence 3c)

It must also be noted that the allocation of GNLP0503 policy wording states: "including promotion of a Traffic Regulation Order to extend the existing 30mph speed limit along the site frontage". This again shows an inconsistent approach to the site assessment process as the same policy could be applied to GNLP0298/0335.

Development to the west (rather than the east) would provide better pedestrian links to, and could contribute to the viability of existing services such as the sports facilities, village hall (and the clubs/organisations that use these facilities), library, and bowls clubs (to the west of the town centre) and could also have a more beneficial impact on the viability of small independent shops and businesses within the Town Centre. The GNLP process has emphasised the location of GNLP0520 with regards to its close proximity to the Co-op. The Co-op is outside of the defined town centre area (as defined in the South Norfolk Council Development Management Policies (2015), Maps³⁸). There has been little regard given to defining the Town Centre within the GNLP or footway links to the Town Centre and therefore the “new” residents ease of walking to the town centre to support the range of small independent businesses and shops (including those providing similar goods to the Co-op, e.g. green grocer, butcher, baker, newsagent).

“Policy 5.34 Hingham is identified as a key service centre under policy 7.3. Local services within Hingham include a primary school, GP practice, community buildings, employment opportunities and a food shop”

Policy 5.34 is unsound as it does not adequately describe the range of shops and facilities with Hingham and makes no reference to the Town Centre.

Development to the west would better support NPPF 7. Ensuring the vitality of town centres - para 85f.

Development to the west would also better support NPPF 8. Promoting healthy and safe communities para 91c

The Site Assessment Booklet for Hingham³⁹ concludes:

“Final conclusion on sites for allocation in the Regulation 19 Plan

Based on all the information contained within this booklet the final conclusion of the site assessment process for Hingham is to allocate GNLP0503 for 20 dwellings and GNLP0520 for 80 dwellings as promoted through the Regulation 18C consultation.....See tables of allocated and unallocated sites at appendices A and B for a full list of sites promoted with reasons for allocation or rejection”.

The document ‘Appendix B – Tables of Unallocated Sites with reasons for rejection (Key Service Centres) ⁴⁰, states:

“Land opposite Hingham Sports Centre, Watton Road GNLP0298 1.87 Approx. 50 dwellings

This site is not considered to be suitable for allocation as, despite the proposal to deliver community woodland, allocating this site in addition to the preferred site would result in growth which may swamp the town’s services”

“Land south of Watton Road GNLP0335 5.81 Approx. 100-200 dwellings This site is not considered to be suitable for allocation as it would make an odd, backland form of development without the allocation of site GNLP0298. Despite the proposal to deliver community woodland, allocating this site in addition to site GNLP0520 and GNLP0503 would swamp the town’s services”.

³⁸ https://www.south-norfolk.gov.uk/sites/default/files/Development_Management_Policies_Document_Maps.pdf page 6

³⁹ https://www.gnlp.org.uk/sites/gnlp/files/2021-01/Hingham%20Booklet_0.pdf

⁴⁰ https://www.gnlp.org.uk/sites/gnlp/files/2021-01/Appendix%20B%20-%20Unallocated%20sites%20KSCs_0.pdf page 8

Taken as the final conclusion for the rejection of GNLPO298 and GNLPO335 it would appear that it has been conceded that the previous grounds for rejecting the sites as reasonable alternatives are no longer applicable, and GNLPO298 and GNLPO335 could not be included in the plan because GNLPO520 and GNLPO503 had already been allocated for development.

The conclusion for allocating GNLPO520 reads “This site is proposed for allocation on a reduced boundary to avoid areas of surface water flood risk and historic environment impacts. The site has been chosen for allocation as it is well located on the approach into the village adjacent to the existing allocated site” .

There is no evidence that a reduced boundary will mitigate flood risk or historic impacts, and it is a fact that the location of GNLPO520 provides poor footway links to the town centre and services such as library/”village” hall, therefore the decision to allocation GNLPO520 for development is one based on bias toward the site because it is adjacent to the “existing allocated site” (i.e The Hops).

The policy wording for GNLPO520 appears to be written to justify a predetermined decision to allocate GNLPO520 in the GNLPO, a decision made prior to consultation. The policies attached to GNLPO520 do not prove to address or mitigate the issues raised during the consultation, they are merely words on paper and are therefore contradictory to GNLPO Delivery Statement (page 39)” Housing The plan promotes a pro-active approach to delivery through only allocating housing sites where a reasonable prospect of delivery, taking account of policy requirements in this plan, can be evidenced”.

The decision to allocate GNLPO520 has been forced upon a community and residents despite representation (on evidential grounds) against it and the allocation of GNLPO520 receiving no community support. The GNLPO is not sound or justified, the GNLPO final conclusions demonstrates that reasonable alternatives have not been fully taken into account or that decisions have been made based on proportionate evidence.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified at 5 above. (Please note that noncompliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

GNLPO SHOULD NOT BE ADOPTED IN ITS CURRENT FORM

Removal of site GNLPO503 from the GNLPO in accordance with the landowners wishes.

Removal of GNLPO503 due to undeliverability of the site due to the caveat” subject to provision of a safe access and a continuous footway at the west side of Dereham Road from the site access to Pottles Alley”.

Removal of the 20 dwellings from the housing numbers specified for Hingham/Reconsider the housing numbers allocated for Hingham/Reconsult to allow for an alternative site to come forward.

AND

GNLPO SHOULD NOT BE ADOPTED

Proper regard should be given to the representations made in opposition to GNLPO520 being allocated for development, especially with regard to flooding issues, potential impact on historical heritage, the protection of valued landscape, the adequacy of footway links and proximity to ALL of the town’s facilities.

GNLPO520 should be removed from the plan.

Reconsider the housing numbers allocated for Hingham/Reconsult to allow for an alternative site to come forward and for representations to be made.

Consideration MUST be given to if a site would provide a benefit alongside the proposed housing development, and if it would enable opportunity to achieve the aspirations of the community/town council for “future proofing” Hingham to be able to provide facilities to a growing community.

Allocations of any sites should be based on firm evidence that proposals made in order to mitigate, are actually feasible and achievable.

Evidence

Evidence

3a, RESIDENTS VIEWS ON GNLP0298 and GNLP0335 AS POTENTIAL HOUSING DEVELOPMENT ALLOCATIONS (the resident has made a direct submission to the GNLP team)

Sun 14/03/2021 19:28

Dear Sir,

I have just read the minutes of the draft TC meeting 2nd February 2021 with regard the GNLP proposals for Hingham.

GNLP 0298 and GNLP 0335, A development of this size would cause substantial AND UNACCEPTABLE HARM TO the character and wildlife of the area.

Loss of habitat for deer, skylarks, foxes, owls and other wildlife.

Further to the residents’ comment about speed of vehicles entering and exiting Hingham along Norwich road where the proposed development for site GNLP 0520. I would think that the speed of these vehicles is considerably lower than that of vehicles along Watton Road.

The vehicles entering and leaving Hingham via Watton Road are I would think in excess 75% of the time over of 30 MPH and sometimes way in excess of 30.

I have never seen the Hingham speed people or the Police at Watton Road end of Hingham.

The developer proposes to make an access and egress from their development west of no 50 Watton Road.

At present this is only approx 8 meters wide. The entrance will need to be widened. This will result in more destruction of hedgerow and wildlife habitat.

My property and other properties on Watton Road and Rectory Gardens currently overlook open fields. This development would destroy that view. Yet on the developers site they advertise properties with open field views to rear.

Dust, noise and general inconvenience during the construction phase will have a detrimental effect on my household and my neighbour's health and wellbeing during construction.

The construction period I can see being about 2 years or possibly longer.

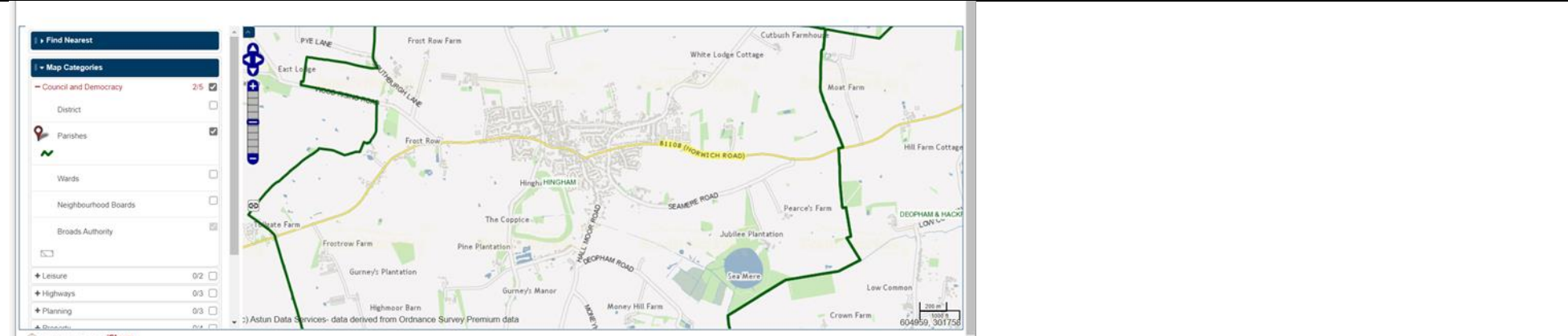
I think if this development was to go ahead, due to the fact there is a blind bend Approx 100 metres to the west of the proposed development entrance. This I do not believe has a clear line of sight due to the speed of vehicles entering Hingham along Watton Road from the west.

Mud on the road from contractor’s vehicles turning in and out during construction phase would be a very serious hazard. AN ACCIDENT WAITING TO HAPPEN due to vehicles approaching from the West along Watton Road towards the proposed development sometimes travelling far in excess of 30 miles per hour. to the west of the proposed entrance the speed limit is 40 MPH with vehicles often in excess of this speed.

The developers say they will plant a ten-acre woodland is the going to use mature trees NO they will not therefore will take 10 or 20 year to mature, therefore giving no benefit to the present residents.

The woodland proposed by the developer .If this woodland were to be 100 mtrs wide x 420 metres The woodland could be placed behind the houses on Watton Road and Rectory Gardens ,as opposed to the other of the proposed development.

Evidence 3b – PARISH BOUNDARY AND SHOWING THE LOCATION OF FROST ROW



Evidence 3c
WATTON ROAD HINGHAM – APPROACH TO THE SITE ENTRANCE OF GNLP0298



REPRESENTATION 4

PART B - Representation

**3. To which part of the Local Plan does this representation relate?
(Paragraph, table/diagram, policy, map etc)**

GENERAL REPRESENTATION REGARDING THE PLAN MAKING PROCESS

Statement of Consultation <https://www.gnlp.org.uk/regulation-19-publication/evidence-base>

The GNLP has not been prepared in accordance with NPPF 3. Plan-making

The GNLP has not been prepared in accordance with the South Norfolk Council Statement of Community Involvement

4. Do you consider the Local Plan is:

Legally compliant NO

Sound NO

Complies with the Duty to co-operate NO

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

NPPF 3 - Plan Making states:

15. The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

16. Plans should:

(a) be prepared with the objective of contributing to the achievement of sustainable development;

(b) be prepared positively, in a way that is aspirational but deliverable;

(c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

During the Regulation 18 A and C consultation the ONLY representations in supports of GNLP0520 were made on behalf of the developer. The Community's response to GNLP0520 was that it should not be included in the GNLP for development.

Flood risk, detrimental impact on the landscape and highway/pedestrian safety were key points of concern raised by residents and the Town Council. A comprehensive representation document was submitted by the Town Council during the Regulations 18C consultation. This document represented views of residents (which were expressed to the Town Council), and hours of work to ensure that the representations were presented in an objective manner based on local knowledge and fact.

As previously stated, the representations have been over summarised/simplified/misrepresented/ignored in documentation prepared as the evidence base and for the Regulation 19 Cabinet Papers⁴¹.

The general disregard for representations is highlighted in the minutes of the Greater Norwich Development Partnership Board Meeting Date: 10 July 2020, where it is minuted:

“The Chairman added that it was important to record consultation comments as opinion, rather than fact”.⁴²

During the Development Partnership Board Meeting (10 July 2020) it was also minuted:

“6. DRAFT GREATER NORWICH LOCAL PLAN REVISED TIMETABLE

This report presented a proposed revised timetable for the remaining stages of the GNLP in the light of the new circumstances arising from the Covid-19 pandemic, as well as the significant number of consultation responses received. It was suggested, therefore, that additional time was required for proper consideration to be given to the comments received during the consultation to ensure that a robust evidence base for the GNLP was drafted”.

The report included in the papers for the GNDP board meeting of 10 July 2020⁴³ states:

“Revised Timetable

2.1 Given current resources it is not considered possible for all necessary evidence to be produced in support of a sound plan and get endorsement of the draft Regulation 19 version of the plan prior to the local government elections due in May 2021.

2.2 This means it will be possible to undertake further focussed consultation on possible changes to the plan without introducing further delay to the timetable. This is considered advantageous in reducing risks to soundness and allowing improvements to the plan”.

This demonstrates that the GNLP team did not have sufficient time and resources to adequately consider the representations made and therefore had doubts about the soundness of the GNLP. A revised timetable was agreed, and it was agreed to include a focused Reg 18D consultation from 02/11/2020-14/12/2020, therefore allowing a “Post-Reg. 18(d) 8 weeks allocated for inputting and processing reps, then 8 weeks to finalise Reg. 19 plan then 6 weeks for final SA etc”. The regulation 19 consultation was at that time scheduled for August /September 2021.

Despite the concerns raised in July 2020, regarding lack of time and resources and regarding issues with the soundness of the plan, at the next GNDP Board meeting on 30 September 2020 (due to the potential impact of the planning white paper) the timetable was further revised removing the previously agreed Reg 18D consultation and it was agreed to “instruct officers to prepare a Regulation 19 pre-submission version of the Plan for consideration by the GNDP Board in December 2020”.

It is noted there is a detailed report on implication of the planning white paper⁴⁴ and reasoning behind the timetable change, however the report does state:

⁴¹ <https://www.gnlp.org.uk/sites/gnlp/files/2021-01/Key%20Service%20Centres.pdf>

⁴² <https://www.gnlp.org.uk/sites/gnlp/files/meeting-minutes/200710-MINS-GNDP.pdf>

⁴³ <https://www.gnlp.org.uk/sites/gnlp/files/meeting-papers/amended-200710-AG-GNDP-Board.pdf> page 70

⁴⁴ <https://www.gnlp.org.uk/sites/gnlp/files/meeting-papers/200930-AG-GNDP-Board.pdf>

“The GNDP report on 10th July 2020 also highlighted the need to comprehensively incorporate consultation feedback in the re-draft of the plan. It stated that “Representations have been summarised in the previous report but to ensure that proper consideration is given to these comments additional time is required”. Work on this task has been prioritised and has progressed well. Staff are currently re-drafting policies based on consultation comments and new and emerging government policy”.

It is a concern that the accelerated plan process has led to representations made by residents and Town and Parish Councils not being fully considered and has also removed an opportunity for comments to be made regarding sites submitted during the Reg 18c consultation.

For example, Site GNL4011 was submitted during the Reg18C consultation, the site assessment booklet⁴⁵ states:

“Taking account of the comments received through previous public consultations, existing commitment, achieving safe access to school, and the constraints set out in the HELAA including those highlighted below, the following site is considered to be a reasonable alternative worthy of further investigation regarding its potential for allocation. This will be done through discussions with the Highways Authority, Lead Local Flood Authority, and officers in Development Management with specialist knowledge about landscape, townscape, trees, etc. These comments will be sought through the Regulation 18D consultation and taken account of at Regulation 19”.

The site was rejected following further comments made by highways; however the opportunity was removed for local knowledge and opinion (for example of alternative walking routes to the Town Centre via Hall Close and Copper Lane) to be given via a public consultation.

The minutes of the GNDP board meeting of 30 September 2020 states (in response to a question submitted by the public):

“Significant weight is always given to local and parish preferences for sites, but it is not the sole consideration. Weight is also given to the evidence provided about sites”.

In the case of Hingham, the GNLP has disregarded the evidence of residents and the Town Council which was submitted as written representations. No weight has been given to the preference of the Town Council for GNL0520 **not** to be allocated for development and for further consideration of rejected (based on the flawed selection process) sites to be undertaken.

No consideration has been given to the clear aspirations of the community and Town Council to have improved facilities and infrastructure of for development to be smaller sized and gradual, in order to be less impactful on the existing infrastructure and facilities.

Since submitting the Regulation 18C representation the GNLP team had not sought to further engage with the Town Council regarding any of the issues raised prior to the publication of the Regulation 19 consultation. In view of the strength of local feeling and concern, it is disappointing that further engagement with the Town Council, such a site visit to Hingham did not take place.

It is not only the Town Council that have questioned the deliverability of the GNL0503. It should be noted that the Bidwells submission for GNL0520 during the Reg18C consultation states “as detailed in the Note to Policy GNL0503, the second site in Hingham has potential access and amenity constraints”.

⁴⁵ https://www.gnlp.org.uk/sites/gnlp/files/2021-01/Hingham%20Booklet_0.pdf page 60

Clayland Estates and Hingham Town Council concluded that they have also identified similar grounds of objection to the site assessment and plan making processes. Details of these similar points have been detailed in a Statement of Common Ground⁴⁶. The proposal for a SoCG was discussed at the meeting of Hingham Town Council on 02 March 2021.

Statement of Community Involvement

South Norfolk Council website states:

“The Statement of Community Involvement (SCI) outlines how we will consult with the people of South Norfolk and other stakeholders on major planning issues. This includes consultations on the documents that make up the Local Plan and on dealing with planning applications. We must comply with the SCI in preparing any Local Plan document or when determining a planning application”.

The South Norfolk Council Statement of Community Involvement⁴⁷ (para 1) states:

“Local Knowledge is important as it helps to ensure development in South Norfolk maximises the benefits for the community whilst protecting the special qualities of the district.”

With regard to the allocation of GNLPO520 and GNLPO503, the local knowledge regarding flooding, poor footway links to shops and services, and the unfeasibility of a continuous footway on the west side of Dereham Rd, have been completely disregarded.

The SoCI also goes on to state:

“Feedback. 66. It is important to feedback the results of consultation regularly. It allows people to see how their contributions have been taken into account and helps to maintain their confidence in the process. Feedback needs to be relevant, concise and easily understood and we need to explain clearly why certain decisions have been made.

67. Opportunities for feedback include press releases, The Link, publications produced by other parties e.g. parish council newsletters, the website which includes a have your say/results of previous surveys page and direct letters/emails. These will explain how the results will be used in the decision making process”.

There has been no feedback made directly to the Town Council following the Regulation 18C consultation, either directly from the GNLPO team or via the District Ward Councillor. The SoCI states the Ward Cllrs role (page 10); residents have expressed concerns⁴⁸ that the representations put forward during the Regulation 18 consultations have not been represented by the Ward Cllr, despite having been sent a written copy of the Reg 18C representation document submitted by the Town Council. Updates

⁴⁶ <https://hinghamtowncouncil.norfolkparishes.gov.uk/files/2021/03/Statement-of-Common-Ground.pdf>

⁴⁷ https://www.south-norfolk.gov.uk/sites/default/files/downloads/statement_of_community_involvement_-_amended_september_2020_1.pdf

⁴⁸ <https://hinghamtowncouncil.norfolkparishes.gov.uk/files/2021/03/02.02.21-doc.pdf>

have not been received on the progress of the GNLP since the Regulation 18C consultation, other than the Ward Cllr's report made to the Hingham Town Council meeting on 01 December 2020⁴⁹, in which it was advised that it was not known how much longer it will take to finalise the new Local Plan (GNLP).

There is no information regarding the GNLP consultation, and no link to the Reg 19 consultation on the "have your say" "Consultations" page of the South Norfolk Council website (see **screen shot: Evidence 4a**) (although links to the GNLP do appear on the Planning pages of the website).

It is noted that the GNLP website page "How to contact us and give your views" states:

"If you would like to be notified of future planning policy consultation, you can sign up to our database by registering an account in the top right hand corner or emailing gnlp@norfolk.gov.uk. Please note: If you have made comments on a previous consultation you will already be signed up on our database".

Residents have raised concerns that, having raised representations during the Regulation 18C consultation, they were not notified directly of the Regulation 19 consultation.

Whilst it is noted (and welcomed) that the Reg 19 Consultation period was extended by 1 week (to finish on 22 March 2021 instead of 15 March 2021), there was no direct email notification of this from the GNLP team to Town/Parish Councils. The consultation period is still **very limited in view of the extensive amount of evidence base documentation available**.

The GNLP process has not been a platform for local people to shape their surroundings and effective engagement between plan-makers and communities has not taken place (effective engagement should surely result in proper consideration of representations and measures undertaken to effect resolution of issues raised).

This is contrary to NPPF 3 – Plan Making

The South Norfolk Council Statement of Community Involvement has not been adhered to, therefore the GNLP is not legally compliant.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified at 5 above. (Please note that noncompliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

GNLP SHOULD NOT BE ADOPTED IN ITS CURRENT FORM

Removal of site GNLP0503 from the GNLP in accordance with the landowners wishes.

Removal of GNLP0503 due to undeliverability of the site due to the caveat "... subject to provision of a safe access and a continuous footway at the west side of Dereham Road from the site access to Pottles Alley".

⁴⁹ <https://hinghamtowncouncil.norfolkparishes.gov.uk/files/2021/03/01.12.20.pdf>

Removal of the 20 dwellings from the housing numbers specified for Hingham/Reconsider the housing numbers allocated for Hingham/Reconsult to allow for an alternative site to come forward.

AND

GMLP SHOULD NOT BE ADOPTED

Proper regard should be given to the representations made in opposition to GMLP0520 being allocated for development, especially with regard to flooding issues, potential impact on historical heritage, the protection of valued landscape, the adequacy of footway links and proximity to ALL of the towns facilities.

GMLP0520 should be removed from the plan.

Reconsider the housing numbers allocated for Hingham/Reconsult to allow for an alternative site to come forward and for representations to be made.

Consideration **MUST** be given to if a site would provide a benefit alongside the proposed housing development, and if it would enable opportunity to achieve the aspirations of the community/town council for “future proofing” Hingham to be able to provide facilities to a growing community.

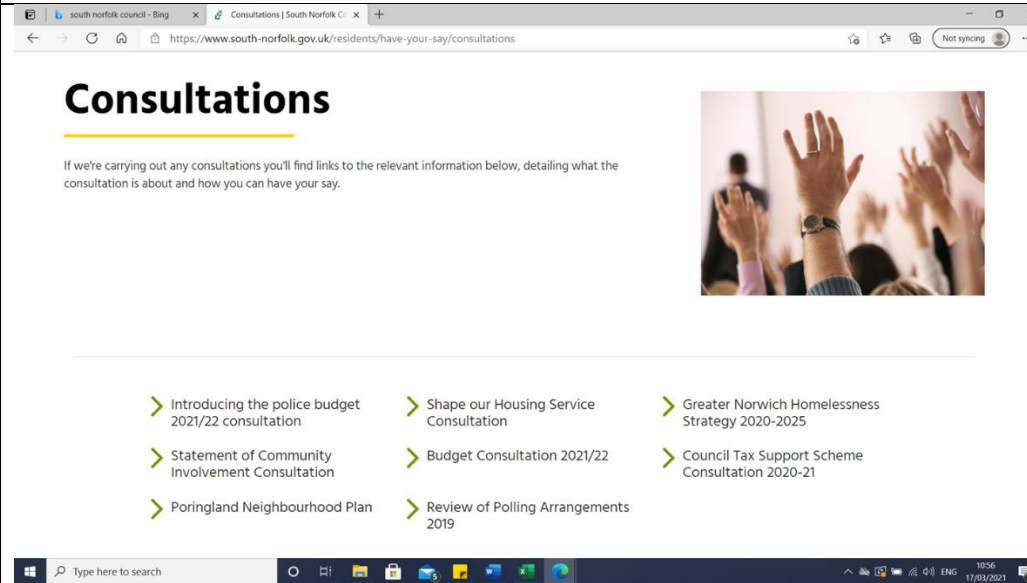
Allocations of any sites should be based on firm evidence that proposals made in order to mitigate, are actually feasible and achievable.

Evidence

Evidence: general

Please refer to documents referenced in the footnotes throughout this document.

Evidence 4a
Screen shot of the SNC website “consultations” page



REPRESENTATION 5

Representation

3. To which part of the Local Plan does this representation relate?
(Paragraph, table/diagram, policy, map etc)

Policy 5.36. Two sites are allocated providing for at least 100 new homes in the key service centre (one for 80 homes, one for 20 homes). There are no carried forward residential allocations and a total of 20 additional dwellings with planning permission on small sites. This gives a total deliverable housing commitment for the key service centre of 120 homes between 2018 – 2038.

<https://www.gnlp.org.uk/regulation-19-publication-part-2-sites-5-key-service-centre/hingham>

4. Do you consider the Local Plan is:

Legally compliant NO

Sound NO

Complies with the Duty to co-operate NO

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

The plan is unsound as the landowner of site GNLP0503 has requested that it be withdrawn from the GNLP therefore the site and its allocated housing commitment is undeliverable.

During the Regulation 18C consultation there were concerns raised regarding the numbers of housing proposed for Hingham and push to deliver housing development “en masse” which could potentially overwhelm the town’s facilities and infrastructure. Housing figures are not discussed in line with actual need within the community or taking into account the number of vacant properties already in existence.

The GNLP runs until 2038 and the Town Council are of the opinion that a phased approach to delivering smaller developments, as and when needed, with a higher focus on affordability for local people would be a more acceptable and appropriate approach, these concerns have not been addressed.

The policy wording for GNLP0520 states “Land south of Norwich Road, Hingham (approx. 6.92 ha) is allocated for residential development. This will accommodate approximately 80 homes. More homes may be accommodated, subject to an acceptable design and layout being achieved, and any infrastructure issues addressed”.

Policy wording states “5.36 Two sites are allocated providing for at least 100 new homes in the key service centre (one for 80 homes, one for 20 homes)”

Aside from GNLP0520 being objected to as being included in the plan, the policy wording itself is unsound and allows for more homes, without a maximum number being stipulated. If GNLP0503 were to remain in the plan, this would have the effect of potentially increasing the number of homes built and increasing density beyond that portrayed during public consultations, to enable absorption of undelivered housing numbers through other sites. This could lead to inappropriate housing numbers and densities arising, contrary to the recommendations made by “Authorities” such as Highways etc during the consultation process.

It is concerning to read that in the Bidwells submission for GNLP0520⁵⁰ the developer is already suggesting that the site can accommodate more than the suggested 80 homes and indeed above the housing numbers allocated for Hingham in the GNLP, and is anticipating GNLP0520 accommodating the 20 homes allocated to GNLP0503.

“3.11 it is evident that the site can comfortably accommodate the minimum number of units identified by the proposed allocation, it has the potential, if required, to accommodate all of the growth proposed for Hingham (i.e. 100 dwellings). This is particularly relevant given that, as detailed in the Note to Policy GNLP0503, the second site in Hingham has potential access and amenity constraints. Given the suitability of the GNLP0520, as is demonstrated by this and previous Representations, it is recommended that, if GNLP0503 cannot demonstrate that it is deliverable, all of the growth afforded to Hingham is allocated on the site.

3.12 In addition, the site could accommodate additional growth, above the 100 dwellings allocated to Hingham, should it become evident that other sites across the GNLP area are undeliverable”.

There has been no consideration to the cumulative impact of housing numbers delivered in Hingham over the past decades, during which time no infrastructure improvements have been made. The housing numbers in excess of 100 will dramatically increase the population of Hingham, with no investment in infrastructure or services to support the growing community. The impact on vital services such as the Doctors Surgery is of particular concern. See Representation 6

The allocation of GNLP0520 (along with the inference that it will deliver more than the 100 homes allocated to Hingham), adjacent to The Hops removes the element of choice for potential new residents wishing to purchase a new build home, being that the development allocations in 2 successive local plans are in the same location, provided by the same developer and will be (it is assumed) to the same style. Resulting in an over prominent overbearing large development not in keeping with the overall character of the town.

This is contrary to NPPF 12 Achieving well-designed places para 127

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified at 5 above. (Please note that noncompliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

GNLP SHOULD NOT BE ADOPTED IN ITS CURRENT FORM

Removal of site GNLP0503 from the GNLP in accordance with the landowners wishes.

Removal of GNLP0503 due to undeliverability of the site due to the caveat” subject to provision of a safe access and a continuous footway at the west side of Dereham Road from the site access to Pottles Alley”.

Removal of the 20 dwellings from the housing numbers specified for Hingham/Reconsider the housing numbers allocated for Hingham/Reconsult to allow for an alternative site to come forward.

⁵⁰ [file:///C:/Users/Hingham%20Town%20Council/Downloads/Regulation%2018%20\(C\)%20-%20Hingham%20-%20GNLP0520%20-%20Part%201%20\(12\).pdf](file:///C:/Users/Hingham%20Town%20Council/Downloads/Regulation%2018%20(C)%20-%20Hingham%20-%20GNLP0520%20-%20Part%201%20(12).pdf) page 9

AND

GNLP SHOULD NOT BE ADOPTED

Proper regard should be given to the representations made in opposition to GNLP0520 being allocated for development, especially with regard to flooding issues, potential impact on historical heritage, the protection of valued landscape, the adequacy of footway links and proximity to ALL of the towns facilities.

GNLP0520 should be removed from the plan.

Reconsider the housing numbers allocated for Hingham/Reconsult to allow for an alternative site to come forward and for representations to be made.

Consideration MUST be given to if a site would provide a benefit alongside the proposed housing development, and if it would enable opportunity to achieve the aspirations of the community/town council for “future proofing” Hingham to be able to provide facilities to a growing community.

Allocations of any sites should be based on firm evidence that proposals made in order to mitigate, are actually feasible and achievable.

Evidence – please see representation 6

REPRESENTATION 6

Representation

3. To which part of the Local Plan does this representation relate? (Paragraph, table/diagram, policy, map etc)

Appendix 1 Infrastructure requirements

<https://www.gnlp.org.uk/regulation-19-publication-part-1-strategy-appendices/appendix-1-infrastructure-requirements>

With reference to:

Infrastructure Needs Report

<https://www.gnlp.org.uk/sites/gnlp/files/2021-01/Greater%20Norwich%20Infrastructure%20Needs%20Report%20for%20Reg.%2019%20-%20final.pdf>

4. Do you consider the Local Plan is:

Legally compliant	NO
Sound	NO
Complies with the Duty to co-operate	NO

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

Gnlp Part 1 The Strategy Appendix 1 – Infrastructure Requirements is in general very limited in its commitment to provide infrastructure to support the housing numbers allocated, with NO commitment to Hingham stipulated.

During the Regulation 18C consultation Hingham Town Council submitted representations to POLICY 4 - STRATEGIC INFRASTRUCTURE (see evidence 6a), There is no evidence to show that these representations have been given consideration.

With specific reference to Hingham, no infrastructure needs have been identified within the Gnlp, despite the cumulative impact of development within the town over the past decades and the extensive development in the nearby Breckland area.

Hingham is bisected by the B1108, which carries traffic from Watton toward Norwich. The Watton area has seen extensive housing development which has increased the traffic flow on the B1108 and through Hingham.

Within the Gnlp there is no reference to the geographical location of Hingham in reference to being on the border with Breckland, and although the Duty to Co-operate should have resulted consideration of the housing numbers agreed in Breckland, there is no evidence of this found in the evidence base. The neighbouring parish of Great Ellingham (approximately 3 miles away) has permission for over 380 new homes.

It is feasible to assume that residents from Great Ellingham will travel to Hingham to access shops and services, such as the Drs Surgery being that Great Ellingham is within the catchment area for Hingham Surgery (see evidence 6b). The surgery have expressed concerns (via email to the Town Council) regarding the housing numbers proposed for Hingham and the surrounding catchment area, expressing that if only a ¼ to ½ of new Great Ellingham residents register with Hingham surgery that could equate to well in excess of 200 patients, in addition to patients from over 100 homes in Hingham (again this could be over 200 patients), the rapid increase in patient numbers could overwhelm the surgery.

Access to Hingham from Great Ellingham is via the Attleborough Rd/Fairland crossroads, the Town Council have on numerous occasions expressed concerns regarding the safety of this junction, which would not be permitted to be constructed under today's highway standards.

It would appear that there has been a failure of Duty to Co-operate to ascertain relevant information regarding road infrastructure improvements required to support growth both in Hingham and in the surrounding Breckland areas (which by geographical location greatly affect Hingham's road capacity). Key information has not been provided by NCC Highways regarding road infrastructure concerns previously and repeatedly raised by the Town Council.

The Town Council and Norfolk County Council have both invested £5000 (under the Parish Partnership Scheme) to undertake a Fairland Crossroads feasibility study to ascertain what safety improvements could be made to the Fairland Crossroads. The study has been expanded to include assessing the feasibility of a pedestrian priority crossing point in the Marker Place. [\(See evidence 6c](#) for link to Parish Partnership bid containing Fairland crossroad photographs).

Hingham has no public car park, an infrastructure need identified by the Town Council in the Regulation18C consultation. There appears to be no evidence of collaboration with South Norfolk Council regarding the request for land to be allocated for provision of a town car park. Concerns regarding dangerous on street parking and the need for a car park have been raised multiple times with NCC, Police and SNC, County and District Cllrs and, most recently in February 2020 and October 2020 with the SNC Director of Place, who has direct involvement in the Greater Norwich Development Partnership.

[\(See evidence 6d photographs of parking issues\)](#)

In light of Duty to Co-operate, being an ongoing requirement, there has been no further consideration regarding the long-term impact of Covid 19 on services provided by NCC, with specific reference to the Library Service and additional space requirements needed in order for the service to function efficiently, with the likelihood of some degree of long term "social distancing" being required. Currently, in order to make space within library branches, some stock is being held in storage and is not available for customers.

The Infrastructure Needs Report⁵¹ (page 29) states:

It is recommended that 30 square metres of library floor space per 1,000 people is provided.

With specific reference to Hingham Library (which has remained closed since its closure due to Covid lockdown on 21st March 2020 until re-opening on 16 March 2021 for a doorstep service only), the Library has a total floor space of 53.295 square metres. The census population figures for Hingham are, 2001: 2078, 2011: 2367. With the development since 2011 it would be reasonable to estimate the current population of Hingham at around 2500.

The floor space falls far short of what would be a recommended 75 square metres for a population of 2500 (not taking into account that Hingham library serves the outlying villages in the Breckland area).

⁵¹ <https://www.gnlp.org.uk/sites/gnlp/files/2021-01/Greater%20Norwich%20Infrastructure%20Needs%20Report%20for%20Reg.%2019%20-%20final.pdf>

Even taking into account a reduction in floor space being offset by digital services, the library is not sufficient to sustain and support a growing community to the same standard as larger libraries. The WW2 wooden building housing the library was purchased in 1945⁵² (although the exact date of it being utilised as a Library is unknown at the time of writing), and although the library is much loved for its quirkiness, it is questionable if the building is still fit for purpose.

The Lincoln “village” hall was built in the mid-1970s and is charity owned and volunteer run (contrary to the statement in the infrastructure needs report that “In Broadland and South Norfolk most of these community centres are managed and maintained by parish and town councils”). Again, no consideration has been taken regarding the cumulative impact of decades of housing growth in Hingham on such a vital community asset.

Being defined as a Key Service Centre, with no commitment to improving infrastructure or facilities within the town, there seems to be no benefit to the residents of Hingham (the Community), just the burden of additional housing development.

The Town Council have aspirations for the town and community and are seeking to embark on a neighbourhood plan (if feasible to do so). The Town Council has a vision for Hingham which would involve the potential of utilising land put forward in the GNLP for extending/improving community facilities and re utilising existing buildings for alternative purposes. (for example, **in theory**, a new “village” hall in an alternative location would allow the library to re locate into the existing Lincoln Hall, the existing currently private car park be made a public car park, and the existing library building be a resource centre for the community – it’s just one idea of what could be possible with the right support and could provide for future proofing Hingham should further housing development be enforced onto the town). Hingham cannot sustain further increases in population without improvements and investment in the town’s infrastructure and services.

While it is acknowledged that development can have a positive impact on a community, to be able to build and sustain a "stronger community", development in the Town needs to provide adequate affordable housing for local families, a range of suitable housing for a diverse population, housing in appropriate locations. Supporting infrastructure is required, such as provision of improved footways and pedestrian priority crossing points in key locations within the Town, road safety improvements to the "Fairland crossroads", increased capacity at the primary school (when required), a purpose built public car park within easy walking distance of the town centre, provision for green travel such as provision of publicly available electric vehicle charging points, extended green space for sports facilities, provision for an extension to the cemetery.

Hingham Town Council have recently acknowledged the Climate Emergency, any development needs to address and mitigate environmental impact, including in terms of sustainability, green issues, pollution, and wildlife habitat.

Hingham Town Council is committed to working to try to secure the best outcomes for the community and to ensure that the infrastructure is adequate to support residents to be able to use local businesses and in turn enable those businesses to thrive.

The GNLP does not provide for the best outcome for Hingham and the community or its future residents.

⁵² <http://hinghamhistorycentre.co.uk/stories/>

There is a Failure of Duty to Co-operate. The plan making process has not engaged constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the plan. With specific reference to Norfolk County Council (Highways and Library Services) and South Norfolk Council with regard to the need for a car park.

The lack of consideration of infrastructure requirements in Hingham is contrary to the GNLDP Delivery Statement and GNLDP Policy 4 para 225 “As set out in the vision and objectives and the Delivery Statement, delivery of new infrastructure is a priority for the plan. It provides benefits for new and existing communities and is essential to ensure growth is sustainable”.

The GNLDP Delivery Statement states:

“Infrastructure priorities benefit existing communities, support growth, improve connectivity and access to economic and social opportunities, and deliver sustainable and active travel choices to promote modal shift. The Greater Norwich partners will continue to work to coordinate delivery with other providers including Highways England, Anglian Water, other transport and utilities companies, town and parish councils and local health care providers.

Infrastructure will be delivered through:

- On-site and off-site provision required of development through conditions or legal agreements;
- Pooled use of the Community Infrastructure Levy or any successor source of infrastructure payment;
- Maximising opportunities to access Government and other sources of funding;
- Capital investment of public bodies and utilities companies; and
- Locally led delivery vehicles.

The lack of consideration of infrastructure requirements in Hingham is contrary to NPPF para 122c Planning policies and decisions should support development that makes efficient use of land, taking into account:

(c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified at 5 above. (Please note that noncompliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Duty to Co-operate needs to be fulfilled in terms of a full and proper appraisal of Hingham to enable sustainable development, including improvements to infrastructure and services. This should include a commitment to improving the Library and inclusion of any results of the NCC Parish Partnership Scheme study, that identifies a feasible solution to improving junction safety at the Attenborough Rd/Dereham Rd/B1108 Fairland crossroads and the inclusion of a pedestrian priority crossing point that will best serve all residents of Hingham, therefore giving value to the £10,000 investment already made (50/50 Hingham Town Council and NCC)

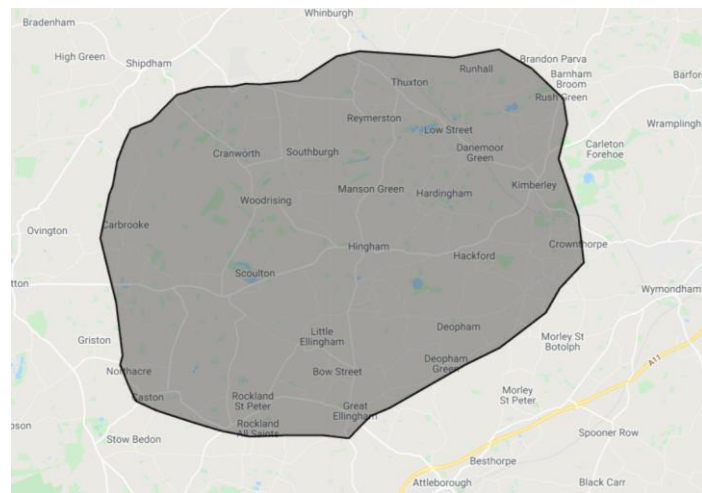
With regard to housing numbers a maximum housing allocation should be set for each allocated site, to ensure aggressive development doesn't take place and appropriate densities are not disregarded.

Evidence

Evidence 6a - Regulation 18C consultation - Hingham Town Council submitted representations to POLICY 4 - STRATEGIC INFRASTRUCTURE

There is insufficient detail as to HOW transport provision will be improved for the outer reaches of the GNLP area. The focus is too heavily on Norwich and Major road networks (A roads). There is no commitment to improvement within Hingham which is situated on the B1108 which is subject to ever increasing traffic numbers and carries traffic from the large areas of development in and around Watton/Carbrooke (Breckland). There is no mention in Policy 4 of road infrastructure improvements to support additional traffic through the rural communities forced to accept more housing development, and no commitment to ensuring that infrastructure will be enhanced to try to ensure greater adherence to speed limits. There are long held concerns over the safety of the B1108 Fairland crossroads – More housing development in Hingham and the surrounding areas will only increase the vehicle numbers using this already dangerous crossroad. Hingham Town Council have applied for (and have been successful) NCC Parish Partnership bid for a feasibility study into the Fairland/B1108 junction safety improvements. In order to support further development of Hingham, if it is proved to be feasible to improve this junction, a firm commitment needs to be made from the Highways authority to undertake the work.

Evidence 6b - HINGHAM SURGERY CATCHMENT AREA



<https://www.hinghamurgery.co.uk/practice-information/practice-boundary/>

Evidence 6c

PARISH PARTNERSHIP BID CONTAINING FAIRLAND CROSSROAD PHOTOGRAPHS

<https://hinghamtowncouncil.norfolkparishes.gov.uk/files/2021/03/2019-bid-Fairland-cross-roads.pdf>

Evidence 6c DANGEROUS ON ROAD PARKING - NEED FOR A PUBLIC CAR PARK

Dereham Road Fairland Junction



The Fairland



Market Place



REPRESENTATION 7

Representation

**3. To which part of the Local Plan does this representation relate?
(Paragraph, table/diagram, policy, map etc)**

Policy - Settlement Map Hingham
<https://www.gnlp.org.uk/regulation-19-publication-part-2-sites-5-key-service-centre/hingham>

4. Do you consider the Local Plan is:

Legally compliant	NO
Sound	NO
Complies with the Duty to co-operate	NO

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

The GNLP settlement map does not include the defined town centre area. This has led to the misinterpretation and misinterpretation that the Co-op being the “centre” of Hingham and to the negligence of the town’s small independent businesses. The Co-op is placed outside of the Town Centre ad defined in the SNC Local Plan Development Management Policies Document 2015 (Maps) DM.2.4 & 2.5(4) Hingham Town Centre Area - Policies DM.2.4 & 2.5⁵³, no reference is made in the GNLP to the defined Town Centre, showing an inconsistent approach to the significance of areas within a settlement and making the plan inconsistent with the SNC Local Plan Development Management Policies Document (2015) which is to be retained.
 Neglect of the significance of the defined Town Centre is contrary to NPPF **7. Ensuring the vitality of town centres – para 85d and 85f. and**

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified at 5 above. (Please note that noncompliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

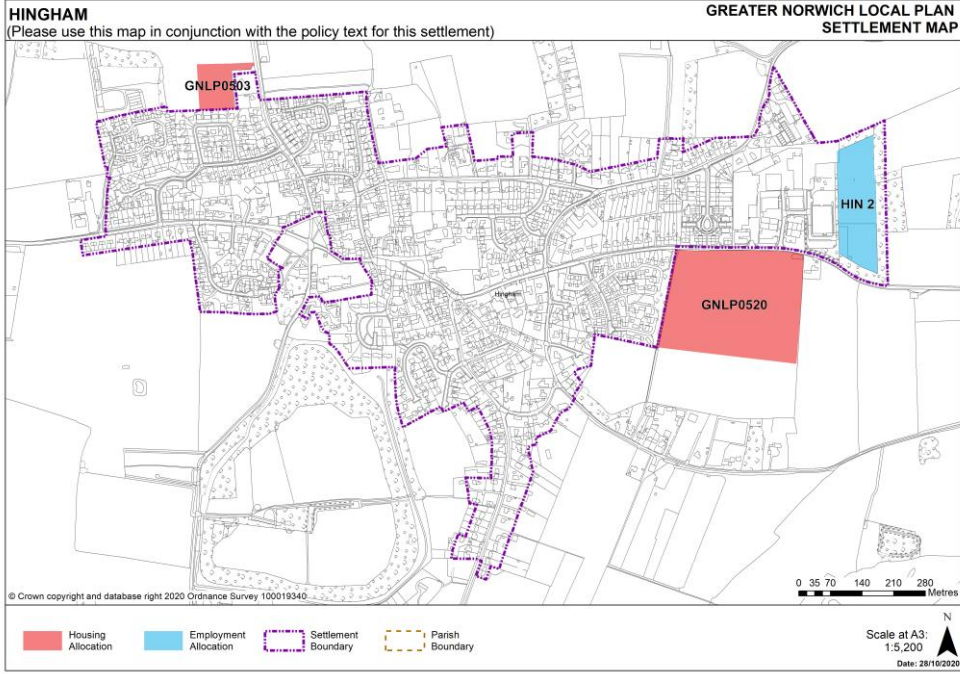
Include a defined Town Centre in the (relevant) GNLP settlement maps.
 Review decisions based on location for development in relation to shops and services.

⁵³ https://www.south-norfolk.gov.uk/sites/default/files/Development_Management_Policies_Document_Maps.pdf

Evidence

GNLP HINGHAM SETTLEMENT MAP

SOUTH NORFOLK LOCAL PLAN DEVELOPMENT MANAGEMENT POLICIES DOCUMENT 2015 (MAPS) – HINGHAM



REPRESENTATION 8

Representation

3. To which part of the Local Plan does this representation relate? (Paragraph, table/diagram, policy, map etc)

Evidence Base – Green Infrastructure Study - 11 KSC Maps Acle to Hingham

<https://www.gnlp.org.uk/sites/gnlp/files/2021-01/11%20KSC%20Maps%20Acle%20to%20Hingham.pdf>

Green Infrastructure Study - 11 KSC Maps Acle to Hingham The Hingham Historic Environment map shows the incorrect area for the Hingham Conservation Area (shown in orange) (Evidence 8.1) . The map is dated 24/01/2021, however the Hingham conservation area boundary was amended in 2016⁵⁴ to exclude areas of Park Close, Lonsdale Crescent and Rectory Garden to the west. To the south east, the boundary was amended to exclude a section of Store Lane whilst to the east, adjustments were made to exclude modern houses and Norwich Road, Admiral Walk and Hardingham Road

The correct area is shown below (Evidence 8.2) in blue as taken from the South Norfolk Council, My South Norfolk maps⁵⁵

4. Do you consider the Local Plan is:

Legally compliant	NO
Sound	NO
Complies with the Duty to co-operate	NO

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

Detail of the conservation area are incorrect and therefore unsound as an evidence base.

This is reference to the maps for Hingham, other maps may also be incorrect.

Any decision based on location and extent of the conservation area would therefore be unsound.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified at 5 above. (Please note that noncompliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Review evidence base to ensure all maps showing conservation areas are correct. Review all decisions taken on the basis of the location and extent of a conservation area.

⁵⁴ https://www.south-norfolk.gov.uk/sites/default/files/Hingham%20Conservation%20Area%20Character%20Appraisal%20and%20Management%20Guidelines_0.pdf

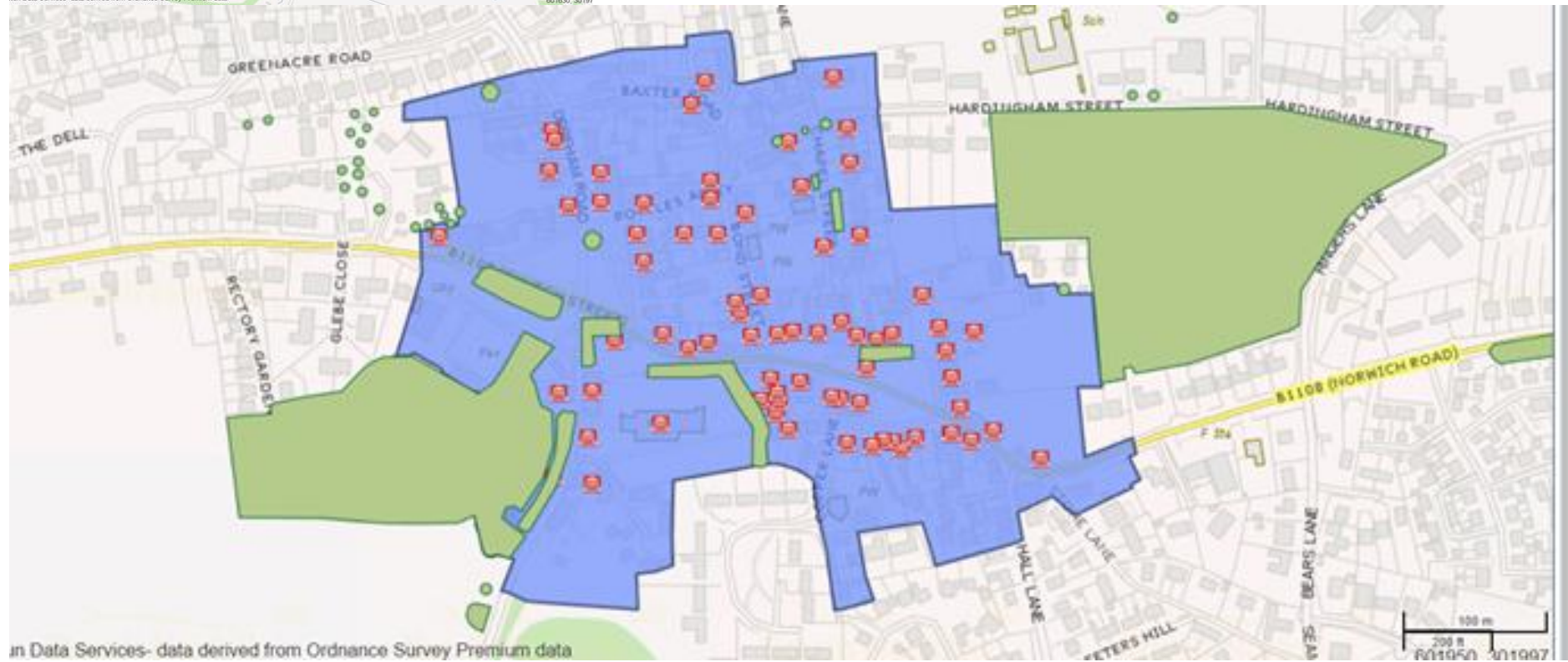
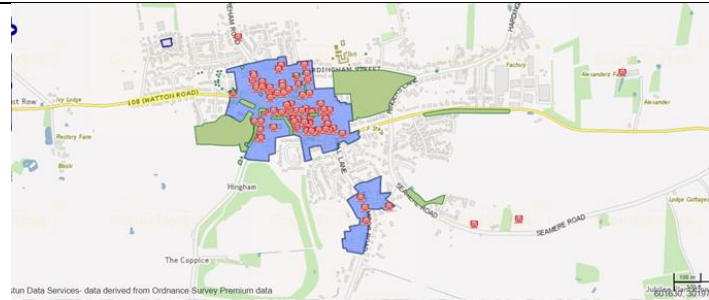
⁵⁵ <https://my.south-norfolk.gov.uk/>

Evidence

EVIDENCE 8.1 GREEN INFRASTRUCTURE STUDY - 11 KSC MAPS ACLE TO HINGHAM



EVIDENCE 8.2 CURRENT CONSERVATION AREA



in Data Services- data derived from Ordnance Survey Premium data

REPRESENTATION 9

Representation

3. To which part of the Local Plan does this representation relate? (Paragraph, table/diagram, policy, map etc)

Evidence Base - Equality Impact Assessment
https://www.gnlp.org.uk/sites/gnlp/files/2021-01/EqIA_Reg19_Final.pdf

4. Do you consider the Local Plan is:

Legally compliant	NO
Sound	NO
Complies with the Duty to co-operate	NO

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

The Equality Impact Assessment⁵⁶, Policy Assessment Table (page 15) returned a Not Applicable result in the site-specific policies GNLP0520 and GNLP0503, in relation to the impact on the protected group including those with disabilities.

The Equalities impact assessment goes on to state:

“Sustainable Communities emphasises the importance of access to local services” (page 16)

“Disability - The range of potential disabilities may result in a wide range of physical limitations. Of these, due to the strategic nature of local plan policies, the disability which a local plan has the most opportunity to address is limited mobility” (page 21)

“Site policies requiring provision of facilities such as open space or road crossings to schools will benefit a wider range of residents than the original target sector. The detail of what is required for elements such as open space will be dictated by the existing provision in the locality at the time of development, but when such facilities are provided, there should be full consideration of the needs of the sectors of the community with protected characteristics, such as mother & toddler facilities or parking spaces, seating for older people, allowing access to those with restricted mobility, and clear signage. The needs of those with limited mobility or sight should be borne in mind when landscape or green infrastructure is delivered. In particular, decisions regarding seating, pathways and planting should consider the needs of these groups, and ongoing maintenance is important, particularly regarding trip hazards or overhanging vegetation for those with impaired vision. Provided that footpaths are of a suitable width and surface treatment, they would be appropriate for mobility scooters, wheelchairs, pushchairs, etc”. (page 23/24)

⁵⁶ https://www.gnlp.org.uk/sites/gnlp/files/2021-01/EqIA_Reg19_Final.pdf

With regard to GNLPO520 there is no evidence to support that the policy relating to the pedestrian refuge in the proximity of Ironside Way, to access local employment opportunities, is feasible or achievable. The Town Council consider that the location of the pedestrian island (as indicated in the submission by Bidwells on behalf of Abel Homes) is dangerous, being that from the south side of Norwich Rd it will place pedestrians behind a blind bend and on the north side of Norwich Road will put pedestrians between the 2 access points to Ironside Way industrial area. These access points to the “employment area” are already subject to frequent vehicle movements especially from extremely large HGV’s, the existing Ironside Way will be the access point for the land allocated for further employment development (HIN2 in the GNLPO) which will (when developed) increase traffic movements to an as yet unknown quantity and size. These dangers would be magnified for those with limited mobility, impaired vision, pushchairs, mobility scooters.

It is noted that the Bidwells submission in support of GNLPO520 includes a zebra crossing to the west of Bears Lane, in acknowledgement that pedestrians from the Hops have to cross the road twice just to get to the Co-op. Again the safety and feasibility of this proposal is highly questionable, as pedestrians on the South side of the road would not be visible to or easily be able to see oncoming traffic, due to the presence of the hedge between the Hops and Bears Lane.

These dangers would be magnified for those with limited mobility, impaired vision, pushchairs, mobility scooters.

Page 25 of the Bidwells submission states

“pedestrians will have the option to cross Norwich Road, to the northern side of Norwich Road, or walk through the neighbouring residential site, to access the pedestrian refuge crossing point from The Hops site. This will allow sufficient access to the local facilities and bus stops within Hingham, not only encouraging more individuals from the new development to walk to access these facilities, but also making public transport more accessible to individuals”.

The Town Council have on several occasions raised concerns with Norfolk County Council highways regarding the safety of the existing pedestrian island as there is poor visibility (crossing from The Hops) due to the existing hedge between The Hops and Bears Lane and it is often difficult to see if vehicles are approaching on the wrong side of the carriage way, to overtake parked vehicles on the north side of the road in the vicinity of the pedestrian island.

Directing pedestrians through The Hops to access this existing pedestrian island would have a negative impact on those with limited mobility, impaired vision, pushchairs, mobility scooters, as it directs them to walk on roads with no footway where there are frequent parked cars, therefore causing them to have to be in the middle of the road.

The footways in Hingham are in places very narrow, therefore pedestrians have to cross the B1108 several times to access shops and services. However, to have to cross the B1108 4 times from GNLPO520 to reach the Library and “Village” hall can only be considered detrimental to those with limited mobility, impaired vision, pushchairs, mobility scooters. These problems already exist for residents of The Hops, as they were not mitigated at the time of development or since, suggesting that they are not capable of mitigation.

The allocation of GNLPO520 is unsound it does not provide safe access to shops and services and is therefore contrary to NPPF 8. Promoting healthy and safe communities, para 91c

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified at 5 above. (Please note that noncompliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

GNLP SHOULD NOT BE ADOPTED

Proper regard should be given to the representations made in opposition to GNLP0520 being allocated for development, especially with regard to flooding issues, potential impact on historical heritage, the protection of valued landscape, the adequacy of footway links and proximity to ALL of the towns facilities.

GNLP0520 should be removed from the plan. Regard should be given to the submissions of residents of The Hops (Survey Appendix B) who are currently affected by the poor footway links to the Towns shops and facilities.

Reconsider the housing numbers allocated for Hingham/Reconsult to allow for alternative sites to come forward and for representations to be made

Consideration MUST be given to if a site would provide a benefit alongside the proposed housing development, and if it would enable opportunity to achieve the aspirations of the community/town council for “future proofing” Hingham to be able to provide facilities to a growing community.

Allocations of any sites should be based on firm evidence that proposals made in order to mitigate, are actually feasible and achievable.

Evidence

Evidence 9 Pedestrian Safety/Pedestrian links to facilities

PHOTOGRAPH TAKEN FROM THE EDGE OF THE TACTILE PAVING ON THE SOUTH SIDE OF NORWICH ROAD EXISTING PEDESTRIAN REFUGE (SHOWING THE HEDGE IN A "WINTER STATE")



PHOTOGRAPH TAKEN FROM THE SOUTH SIDE OF NORWICH STREET AT THE LOCATION OF THE PROPOSED ZEBRA CROSSING (SHOWING THE HEDGE FROM THE WEST OF BEARS LANE)



EXTREMELY NARROW FOOTWAY AT BEACONSFIELD HOUSE NORWICH STREET



CARS PARKED IN THE SIDE ROAD GRANARY WAY – THE HOPS, PREVENTING A SAFE WALKING ROUTE DUE TO NO PAVEMENT



7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? (Tick box as appropriate)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

To be available to clarify issues raised in the representation if necessary, and to enable best representation for the community.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Disclaimer: Data Protection and Freedom of Information: The Data Controller of this information under the General Data Protection Regulation (GDPR)2018/Data Protection Act 1998 will be Norfolk County Council, which will hold the data on behalf of Broadland District Council, Norwich City Council and South Norfolk Council. The purposes of collecting this data are: To assist in the preparation of the Greater Norwich Local Plan To contact you, if necessary, regarding the answers given in your form The response forms received as part of the Greater Norwich Local Plan Regulation 19 publication stage will be made available for public viewing and submitted to the Secretary of State to be considered as part of a public examination by an independent planning inspector. By submitting this form you are consenting to your comments being stored by Norfolk County Council and the details being published for consultation purposes. Once comments have been checked and verified they will be available online (with respondents' names) for others to see. Any representations which are deemed to contain offensive comments will be removed. Whilst we will include names on our website, we will remove personal contact details such as addresses, telephone numbers, emails and signatures before publishing. Please note that anonymous comments will not be accepted as comments must be attributable for the public examination by the Planning Inspectorate. See our Privacy notice at www.gnlp.org.uk for information on how we managed your personal information.

Declaration I agree that the details within this form can be held by Norfolk County Council and that those details can be made available for public viewing and shared with Broadland District Council, Norwich City Council and South Norfolk Council for the purposes specified in the disclaimer above

Alison Doe 22 March 2021 2.15pm

Attached below are appendices A and B

CONTEST FOR APPENDIX A – SURVEY RESPONSES FROM SEAMERE RD

The Survey of Seamere Road was delivered to all properties on Searmere Rd and the 2 properties on the Mill Corner Junction of Seamere Rd, in total 19 properties were surveyed. The survey was constructed to ask questions based on concerns raised previously by residents. The survey was delivered on 16th February 2021. 9 responses were received. 2 residents have submitted supporting evidence (phtographs and videos) and these are included in this representation document. The blank survey can be found here <https://hinghamtowncouncil.norfolkparishes.gov.uk/files/2021/03/SURVEY-Seamere.pdf>

CONTEXT FOR APPENDIX B – SURVEY RESPONSES FROM THE HOPS

The Survey of The Hops was delivered to all properties on The Hops, in total 88 (aprox) properties were surveyed. The survey was constructed to ask questions based on concerns raised previously by residents. The survey was delivered on 16th February 2021. 13 responses were received. 1 resident submitted supporting evidence (phtographs) and these are included in this representation document. The blank survey can be found here. <https://hinghamtowncouncil.norfolkparishes.gov.uk/files/2021/03/SURVEY.pdf>

APPENDIX A – SURVEY RESPONSES FROM SEAMERE RD

SEAMERE						
	are you concerned about surface water drainage/run off affecting Seamere Rd	has your property historically been affected by surface water drainage/flooding issues	since the Hops, has there been any improvement or worsening	If your property has not been affected historically by surface water drainage/flooding - has this changes since the Hops	any comments re GNLP0520	general comments made
1	yes	yes flooding 2008	no			
2	Very concerned about the increased water on Seamere rd. Resident since 1993, and it has got a lot worse in recent years, especially since the Hops has been built	Yes, flooding outside cottage at least twice, especially at the back where it runs off the fields and through the farm	worsening		Seamere Rd is in a valley. The field by the Hops is higher. Water runs across the field onto Seamere Rd to drain into the stream and ditches. Since the Hops, more water has been pushed down as it has nowhere else to go - another development would probably flood me out	SENT PHOTOS AND VIDEO

3	yes, very concerned. Some properties have been flooded in the last few years, and nothing seems to be done about it	ours hasn't but our neighbours have. The main Seamere road is constantly flooded	the worsening of flooding and the constant sewage drain problem with raw sewage flushing out of manholes on Seamere Rd	yes Seamere area is now constant running with water. The drainage is poor and nothing is done about it	It's apparent that neither surface water drainage nor sewage drains can handle the amount of water that we are now being subjected to. Our address has been affected dramatically since the Hops was completed and we are not happy about further development on the site	
4	yes very	no	smell from the manhole cover especially in summer is worsening. The drainage and roadside maintenance is not done often enough to keep clear. It's a lane and leaves block the drains it's half-heartedly eased by digging roadside gullies to nowhere, nowhere for the water to go		are they really necessary to our historic town	

5	<p>We were flooded in 2019 after heavy rain, affecting the rear of our property. Water rushed down from the field behind our property, via the Farm, bringing with it thick mud which is very difficult to sweep away!</p> <p>We were sweeping the water down our manhole, quickly, to prevent it getting into our conservatory ! The 'clean up' operation took a few days and a lot of hard work!</p>	<p>Seamere Road continues to get flooded after heavy rainfall.</p> <p>By reopening the ditch on the south side of Seamere Road, opposite the footpath, this flooding would no doubt be solved. This is down to the farmer who ploughed in the ditch in the first instance!</p>			<p>We are concerned about the proposed development on the Norwich Road, not just because of the surface water problem, but with our Doctors Surgery not being able to cope, or the School. Pedestrian safety is also a great concern.</p>	
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6	<p>Yes, because surface water flooding regularly affects Seamere Road between Bears Lane and the sewage pumping station after a relatively short period of heavy rainfall. Due to the flow volume and static pressure of surface water from Norwich Road and Ringers Lane, the drain gullies in Bears Lane near the bottom of Stone Lane discharge water up onto the roadway. This combines with the natural field run-off from further East along Seamere Road as all water, including that from road gullies, ends up in privately owned ditches</p>	<p>Apart from the roadway problems as described above, my property had not been directly affected during our time until construction of The Hops development commenced. During the construction period my rear garden (over 150 feet long) was flooded all the way down to the back of my house on several occasions, causing damage to my vegetable garden (since completely rebuilt at significant cost to me).</p>	<p>After significant or prolonged rainfall our rear garden suffers flooding from run-off from the field area below The Hops development. Although this level of flooding is less than that experienced during the building work, it occurs more frequently.</p>	<p>Regarding surface water drainage from any new development on Site GNLP 0520, I am concerned that this will also be discharged into the existing ditch parallel with the footpath and end up in the pond adjacent to my boundary, which is where all existing drainage from The Hops, the South side of Norwich Road and the field is deposited. This pond is a constant cause for concern to me, as its maintenance and that of the outflow route which passes through several landowners both public and private cannot be monitored nor enforced.</p> <p>In addition, I would have thought it to be more desirable for future residents to be located in a development across the road from a sports and leisure facility rather than across the road from a well-established industrial estate incorporating light and heavy engineering (with a zone adjacent for its future expansion under policy HIN 2)</p> <p>Finally, whilst I acknowledge that the GNLP is a policy document as opposed to a planning document, the fact that only one major site has been approved in principle effectively ensures that planning approval will be given without any responsibility for site location attaching to the planning authority.</p>	<p>a) The NCC Highways comments about the ability or otherwise of providing an adequate footway route to the centre of Hingham are inaccurate and misleading. Everybody knows that the lack of continuous footway on either side of the B 1108 from the GNLP 0520 site cannot be rectified without compulsory purchase of land (and apparently this was ruled out when The Hops development was approved by SNDC) or forcing pedestrians to cross the main road at least twice or even three times. Whereas there is already a footway from the GNLP 0298 site which only entails crossing the main road once or twice. How can they arrive at this conclusion if they have visited Hingham? These incorrect and misleading comments have formed justification for selection of the GNLP 0520 as a preferred site.</p> <p>b) Even the Lead Flood Authority now acknowledges that disposal of surface water will be a problem if it is linked to the existing Hops discharge route</p> <p>c) The GNLP consultation strategy paperwork states the "if you made representation using their on-line system for the first consultation, you would automatically be registered to be notified of each further stage in the process". This has not been the case for me I did not know that the preferred sites had been allocated. Since some 14/15 others used the on-line system to make representation about GNLP 0520 I am wondering if they too have not been updated by the consultation process. This is a breach of policy, surely.</p>
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						<p>I note that the current document states that a collective response would be preferable to many individual duplications. If this is to be considered by the Town Council, I hope that the above is useful.</p>
7	<p>As a resident of Seamere Rd I am aware of a consistent issue with an excess of water pooling and streaming down the lane. The problem occurs for most of the year. Originally, I thought the water main had broken</p>	<p>we have a year-round issue with a boggy area of garden as with water pooling against the base of our house especially on the north side.</p>	<p>Hard to say, but certainly no improvement</p>			<p>This development is inappropriately large, it is also unsound on the basis of properties waterlogging as well as exposing potential residents to the danger of traffic on the Norwich Road</p>

8	<p>Regarding the flooding - Yes I always respond to all planning applications , including the first initial consultation for the outline planning for the hops / Development plan, registering my concerns regarding the flooding on Seamere Road from the fields behind us included photos and videos showing the flood water as we were flooded numerous times before the Hops where built , this has continued and has become worse since the Hops has been built. If I am honest this situation has felt hopeless and we feel no one has listened to our concerns over the years and was disregarded by all concerned hence the reason for not responding to the initial notice but I am pleased to hear the council are interested in this problem.</p>	<p>Yes we have been flooded numerous times over the recent years, flood water has entered all of our outbuildings and the house, we have lost the surface of the track several times and have had to resurface the track on several occasions Our neighbours in the row of cottages at the front have been flooded</p>	<p>Yes there has definitely been more water in the ditch recently. The Farmer has done lots to help prevent the impact of the flooding and cleared the ditches behind us both , we purchased a large diameter/capacity pipe which the farmer laid for us in the ditch to carry increased water capacity away from our properties. I have attached some videos showing the water in the ditch from the last severe flooding when the water entered outbuildings house and lost the surface of the track.</p>			VIDEOS SUBMITTED

9	<p>We are concerned about issues with surface water and drainage affecting the Seamere Road area. Since The Hops development we have noticed an increase in the amount of water running down the hill leading into Bears Lane and along the road near our house. I have also noticed an increase in water draining off our garden down our drive and there has been an increase in the amount of water sitting on our fields and garden in the winter. It has taken longer to clear after prolonged periods of rain than before the development. I know that a farmer on our road, had to put drainage pipes in the field behind his property as a result of excess water running through his yard following the Hops development.</p>	<p>Besides concerns about drainage we have other objections to the proposed development on Norwich road for a number of other reasons:</p> <ul style="list-style-type: none"> -the Norwich Road isn't safe for people to walk into the town Centre, school and doctors due to inadequate footpaths -there has already been one huge development (the Hops) this side of town , wouldn't it make sense to use one of the other proposed sites, rather than totally destroy an area of great natural beauty -The design of houses on the hops are not in keeping with the area -The hops has had an adverse effect on the wildlife in the area...bats, deer, owls and other birds of prey are visiting our field and garden much more regularly since the development suggesting they are struggling now some of their natural habitat has been destroyed and light pollution has been introduced to a previously dark road -The land the development is proposed on is much higher than Seamere Road leading to a total loss of privacy for residents
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APPENDIX B – SURVEY RESPONSES FROM THE HOPS

	THE HOPS							
	Do you consider there is easy access to towns facilities/comments	how do you access facilities	main method	comments	do you consider lack of pavements on side roads of Hops a safety issue/comments	concerned/does your property suffer from surface water issues	comments re Hops	comments re GNLP0520
1	frustrating in order to walk from Hops to co-op have to cross busy B1108 4 times in journey from and back to home	pedestrian	pedestrian		no	no		concern re access off B1108 as on approach to Hingham from Norwich there is sharp obscured bend. Potential accident black spot waiting to happen
2	NO! All access is insufficient. Crossing roads, fast traffic, narrow footpaths. Pedestrians want paths that make the trip enjoyable	pedestrian	pedestrian		yes - it can be with many children in the entrance. Don't want the new development using the present roads for access	no	all homes on Norwich Rd have their gardens facing Norwich Rd. bad idea	Norwich Rd is unfit for future development. Any new housing will have difficult access and lock poor road and footpaths into never getting any improvements
3	the pedestrian island has made a big difference, but it would have been more beneficial/safer to have a path from the Hops to Bears Lane, we regularly see people walking on the road to avoid crossing the road twice to get to the co-op. Not safe with speeding on Norwich Rd	pedestrian and car	pedestrian		no - generally people drive sensibly on the estate	we do suffer quite badly when there is heavy downfall - slow drainage and debris collecting outside our house	overall, we are very pleased as we feel it is a good quality new build estate with a good sense of space	we have no concerns providing there are good pedestrian links through to the Hops and along Norwich Rd

4	access to facilities is extremely dangerous from Hopsack Rd, pedestrians with young children, mothers with pushchairs and the elderly who may be frail and unsteady is an accident waiting to happen,.. It would be a dereliction of duty for all councils and developers to ignore these extreme needs for improvements	pedestrian	pedestrian	speeding vehicles and HGVs are a constant danger. With the expanding housing increases in Hingham and surrounding areas pedestrian footpaths are totally inadequate	yes - young children and elderly are at risk			what if any plans have been approved to increase the capacity of the Drs surgery, schools and public footpaths
5	Not really.	pedestrian, cycle, car	pedestrian	We were informed by our solicitor as late as June 2020 that the only development she had discovered likely was at the bottom of Hopsack Rd hence our move in confidence to retire. Hops Mk2 would not be in keeping with the proportionate growth of Hingham, as it expands the population by up to 25% as well as expanding the community further east away from the facilities. the proposed pedestrian access to facilities is ridiculous especially for the disabled, and small children expecting them to cross the Norwich Rd twice. no proper Norwich Rd pavement being provided is a lack of safety planning. Its already a dangerous road to cross for existing residents made worse by the speeds in excess of 30 MPH by current traffic.	yes, run off from Norwich Rd already runs down the Hops and is causing surface problems	the hops existing site are an untraditional design not in keeping with the character of Hingham, not more of the same thank you	it seems the Town Council and residents opposed to Hops Mk 2 have been ignored and only the developer has been listened to. This makes nonsense of democracy. The Town Council are absolutely correct in pointing out they do not agree with the GNL P argument for the Norwich Rd proposals. Only the developer supported the GNL P plan for Hingham so why has the GNL P ignored the Town Council and the residents who objected to this plan. The side roads in the Hops do not have pavements and were designed for a few residents to walk along. Now these roads, especially Granary way which is the nearest to the new proposal will have an enforced increase in pedestrians trying	

								to access the towns facilities despite no pavements and cars parked in the road. The Norwich Rd pavements are narrow and on a busy road and only have a poor island crossing. residents then have to cross the busy Ringers Lane, then Norwich Road again to avoid dangerous Bears Lane. it's an accident waiting to happen.
6	NO!!! We have to cross the road twice to stay on the pavement, that's four times for a trip to the co-op	pedestrian	pedestrian		yes - bot not relevant to this proposal	no		approximately 8 properties facing east will lose uninterrupted view of farmland, not something we would like to lose. Any more properties wherever built will impact on us all if no improvements are made to local infrastructure
7	NO - the main road has to be crossed twice to get to the co-op, this is not pedestrian friendly or safe.	pedestrian and car	pedestrian		no - but it could possibly be a safety issue for disabled people in wheelchairs or parents pushing prams/pushchairs and also any one visually impaired.	no	a footpath is needed on the Norwich Rd from the Hops to the Co-op/Bears Lane	development should not be allowed to go ahead without proper provision made for pedestrians / disabled people and children in pushchairs to have safe pavements to get to Bears Lane and the local co-op

8	NO, accessing facilities and areas of the town involves crossing the road several times, with fast moving traffic and narrow uneven pavements	pedestrian and car	pedestrian		no	YES! Considerable expense to prevent flooding in the garden, French drains dug after occupation, huge disruption.	The playground is a serious blight on the neighbourhood and is rarely used	This development is one too many. The infrastructure cannot sustain more housing. We were advised when purchasing our house (2017) that there would be no further development.
9	no. We have to cross the road numerous times to get into town. Many speeding cars driving on the Norwich road make it dangerous to do this. It makes it even more so for people with mobility issues and people with young children/prams etc. There is a refuge to wait in the middle of the road, but visibility is not clear. To build 'Hops v2' on the proposed site would only exacerbate the problem for -children trying to get to school, both the primary in Hingham and to catch the bus to schools outside of Hingham. -People walking into town and to the doctor	pedestrian and car	pedestrian		yes. There are always cars parked both sides of the road in Granary Way leaving limited space for pedestrians to walk only down the middle of the road. We regularly get cars and delivery vans driving down the length of Granary Way to turn around at the turning point at the end of the cul de sac. This limits the space for pedestrians even further. We often think we hope we never need an ambulance or fire engine where we live, as they would never get through.	Whilst we don't have specific flooding issues ourselves, the ground does retain water and remains wet for a long time after rainfall. When it rains the surface Water from Norwich Road runs straight into Hopsack Road bringing with it mud and debris which blocks the drains.	When we we're considering the purchase of our house, we specifically asked on several occasions if there was to be development on the proposed site opposite. It was confirmed each time that there definitely would not as development was only planned at the bottom of Hopsack Road. As a result of this information, we decided to retire a year earlier than planned and buy the property we now live in. We feel very let down by this proposal.	We love our bungalow and living in Hingham, however, properties on The Hops are not the most attractive to look at and are certainly not in-keeping with properties in the rest of the town. To build a duplicate 'Hops' on the proposed site would be a dreadful overwhelming eyesore when entering Hingham from Norwich. The benefits of the proposed Watton Road site appear to far outweigh the Norwich Road site, in that access into town, the doctors surgery and schools would be easier and safer for pedestrians. The visual impact would be less obtrusive than a sea of properties on the Norwich Road site when entering Hingham. The planting of a woodland on the Watton Road site is in keeping with the positive effects on the environment and would be an asset to the residents of Hingham.

								<p>It would appear that the comments documented by the town council's response following the consultation in February 2020 have been totally disregarded.</p>
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10	No, it is really hard at times to cross the road, both at the end of the Hops by the Public Footpath and at the pedestrian island at the entrance, as cars go too fast and there is no clear visibility, especially when trying to cross with a pushchair	pedestrian, cycle and car	pedestrian		yes, not all of the cars go slow enough and there are lots of kids, they don't seem to understand these side roads are roads	The drains get blocked and parts of the garden flood	access into town via foot is really not great	
11	Crossing over Norwich Road then Ringers Lane then back to the Co-op side of the road is not ideal when walking to the co-op as cars still speed regardless of the speed limits. The same can be said of the Market Place	car	car		No- not an issue for us	YES! Surface and ground water issues, most of the landscaping has failed due to surface and ground water. The trees were not looked after properly and had no tree guards. The driveway soakaway is inadequate a nearby house to ours nearly flooded so soakaway crates were installed in front of it, they caused more ground water issues. A garage has flooded and holes were drilled into a garden to alleviate flooding		
12	On more than one occasion as I have pulled out of both my garage and driveway to turn right on Granary Way and exit immediately into Hopsack Road to leave the Hops I have come close to colliding with vehicles (cars and delivery vans) entering Granary Way from Hopsack Road. It is a blind corner due to the location of my 2m tall boundary fence and planting both installed by the developer during the construction. The lack of a pavement in Granary Way has also meant pedestrians walking along Granary Way to exit the Hops are also in danger of being struck by the same traffic coming around the corner. Without a pavement as refuge there is nowhere to be safe at this point. Any additional pedestrians from a proposed Hops Mk2 would increase this danger and the likelihood of a pedestrian v motor vehicle incident.							

13	<p>Comments Regarding GNLPO520 Proposed development of land in Hingham</p> <p>I am not surprised that the Norwich Road site is still included for development despite strong local opposition. The various councils involved seem to want to adopt this solution because it is the easiest way for them to meet their own and central government requirements:</p> <p>Pedestrian Access from The Hops (and any future development) to the village and amenities is poor. There is no continuous pavement to get to the Co-op and the rest of the village amenities without constantly crossing the road: the same road we already have speeding issues with! To compound this at night the street lighting on this dangerous part of the road is totally inadequate!! It begs the question, why wasn't the provision of a continuous pavement and modern street lighting on that stretch of road next to The Hops and the Co-op site not made a requirement when planning permission was granted for both by the council.</p> <p>We access the village from the Hops, on foot, by bike and car. All are dangerous because of the issues mentioned above but by bike and car there are additional problems with hidden access from side roads to the main road and the double bend, both of which are again particularly bad at night. Obviously the bends and side roads are part of the character and history of the village which we need to live with and embrace. However, putting a large housing estate and a new industrial complex on the approaches to our quirky road layout will exacerbate existing issues and make them more problematic.</p> <p>The proposed large housing estate and a new industrial complex will also feed over a hundred extra cars/vans onto and off a single carriageway road on a stretch which has an existing blind bend, problems with speeding vehicles and congestion issues with vehicles trying to pass the bus when it has stopped to let people on and off.</p> <p>We all know and we can confirm that there are surface water drainage issues at and surrounding the Hops. However, looking at GNLPO website we note Consultants produced and submitted a highly technical report (which a lay person can't understand) to more or less say that there is no real problem with surface water drainage!</p> <p>When we moved to the Hops there was definitely local resentment in the village..... posh, too much money, up from London, making property too expensive and out of the reach of local, and particularly young local people etc.....! Over time we have discovered and pointed out that there is some provisions for social housing on the estate and a lot of people who live in Hingham are not actually from the village and for that matter the area in general. However, the perception existed because we are on a single estate plonked on the outskirts of the village and perceived as not actually part of it. We know a couple of people who felt isolated and have actually moved because their expectation was to be part of a rural community.</p> <p>This is one of the very reasons that indigenous people from the village, other 'blow ins' and those, like us from the Hops, know that developments need to be small and integrated into varied locations throughout the village in order to develop cohesion and a spirit of community. People accept a few new neighbours local to them but to compound a situation like the Hops (that thankfully people are starting to come to terms with) by building another bigger mark 2 Type Hops in one spot right on the outskirts of the village again we feel is definitely not the way to go!</p> <p>In summary we are profoundly not in favour of the proposed development GNLPO520</p>
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