

Greater Norwich Local Plan Examination – Clayland Estates Ltd Representations ID 23954

Matter 1 Issue 2 Points 3 & 4

Hearing Date: Tuesday 1st February 2022

Further Written Statement on behalf of Clayland Estates Ltd

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In relation to the above Matters Issues and Questions, the intention of this further statement is to assist the Inspectors, by signposting, in relation to the objections already submitted to the GNLP Reg 19 draft on behalf of Clayland Estates Ltd, how those objections relate to the MIQs.

3. Have all potential site allocations been assessed on a comparable basis?

Clayland's Objection grounds make detailed reference to how and why the site assessment process has not been conducted fairly consistently and objectively, and how objective assessment would significantly sway the resultant scoring away from the selected sites, but that, even with existing scoring, the sites selected scored worse than other reasonable alternatives. As one example, the need for some mitigation on pedestrian access routes was phrased as a deciding factor, notwithstanding that selected sites either required greater mitigation or the proposed mitigation requirements within the draft allocation policies are not achievable.

Clayland submit that if one looks back to the HELAA Site Assessment scoring criteria and applies this in an objective manner, GNLP would have logically concluded that the sites selected were inferior to reasonable alternatives. Even with the scores as assessed there are reasonable alternatives including GNLP0298 with superior scoring than GNLP0520.

If the initial scoring assessment is unsound then the basis of allocation is unsound. Throughout the Plan preparation period GNLP appear to have a pre-determined allocation for Hingham in mind and have manipulated the assessment output and ignored all local comment including the Town Council in maintaining that stance.

Further information has been provided for both allocated and reasonable alternative sites eg pedestrian route mitigation, which has further identified that mitigation requirements for GNLP0520 are greater than alternatives (including GNLP0298) and that stated policy requirements for GNLP0503 (now withdrawn from availability) of a continuous footpath are not achievable. This additional information appears to have been disregarded at later stages of plan preparation.

Clayland have submitted detail documentation in relation to

- this site assessment process and scoring (Appendix B),
- the comparable pedestrian access routes (Appendix C2) and other highway matters and matters (Appendix C1) incorporated into allocation policy requirements that are not achievable
- flood risk issues in relation to GNLP0520 remain and the risk of non delivery or significant harm are clearly unresolved (Appendix A)

- affect of proposed allocations on Townscape/ Landscape issues and on Listed Buildings and the need to mitigate, rather than proposals protecting and enhancing heritage assets (Appendix D)
- Absence of assessment of Biodiversity net gain as required by GNLP Policy 3 (Appendix F2)
- the requirement of GNLP Policy 3, to take account of proportionate evidence of the relative merits of reasonable alternatives, has not occurred

It is submitted that an unsound site assessment process renders the proposed allocation of GNLP0503 and GNLP0520 unsound.

The objection proposes that these allocations are deleted.

4. Is it clear how the SA has influenced the Plan and the choice of spatial strategy? Does it support the spatial strategy or is there anything in the SA which indicates that changes should be made to the plan?

- Points 5, 6 and 7 of Clayland's objection highlighted how proposed allocation of site GNLP0520 was unsound in relation to flood risk (contrary to NPPF para 158), and Policy 2.9 of GNLP in relation to flooding, when there is known flooding issues from the existing adjoining development, and the draft allocation wording highlights that further flood investigation and mitigation was necessary, with risk of non-delivery and significant harm to adjoining property and listed buildings
- Point 9 of Clayland's objection and Appendix F highlights that site selection took no account of biodiversity gain (as required by GNLP Policy 3), and how that factor should have influenced site selection.
- There are inconsistencies within the SA with regard to assessment where the potential for significant biodiversity net gain on GNLP0298 has been ignored, and in respect of GNLP0520 assumptions on the affect of mitigation by policy criteria in respect of Biodiversity, Deprivation, Education and Natural Resources appears to have significantly improved the scoring between the Post mitigation assessment and the Policy assessment, compared to sites not selected, which therefore do not have policy influence adjustment to the same extent. We thus consider that there is little difference between GNLP0520 and other reasonable alternatives in assessment post mitigation (page E35) to influence selection in Hingham and that the SA document has been used as justification and support rather than as an additional tool to assess and influence strategy. We also note that in Section D19 of the SA, in addition to the two proposed allocation sites, site GNLP4011 at Hall Close has been singled out for more detailed assessment and whilst scoring as well as or better than the proposed allocations, and being noted as having good pedestrian connection enabling opportunities to travel by foot, it was not carried forward to allocation for reasons of the inability to provide pedestrian facilities alongside 2 way traffic access. These two statements appear contradictory and evidence the lack of weight given to the SA document in influencing strategy.
- We suggest the Inspectors compare tables for GNLP0520 (18C) on pages E35 and F446 and the reasoning text with the latter as evidence of how the SA is being used to justify rather than to influence policy.