

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

Matter 2 Issue 1 Points 5 & 6

Hearing Date: Wednesday 2nd February 2022

Further Written Statement on behalf of Clayland Estates Ltd

Submitted by J R Maxey MA FRICS FAAV, Maxey Grounds & Co

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.

5. Is the Plan Strategy consistent with the requirement in the NPPF for plans to support appropriate measures to ensure the future resilience of communities to climate change impacts?

- 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), 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
- Clayland say that whilst the underlying Policies of the plan do set out measures to assist climate change resilience, they miss the opportunity to consider all environmental measures in site selection in that they do not fully consider the Biodiversity net gain attributes of proposed allocations
- Clayland’s position is that site selection in practice has not adhered to the Policy principals set out to achieve resilience, when the selection scoring on climate change and other matters is distorted by subjective and inconsistent application of the criteria, with a result that sites at higher risk of flood and lower Biodiversity net gain are selected ahead of those that in environmental and climate change terms would perform better.

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.

6. Is it clear which policies in the Plan are strategic, and which are non-strategic?

- Policies 7.1 – 7.6 are within a Document 1 of the plan titled “The Strategy” and within a section of the Plan headed “Strategies for the areas of growth”. As such we understand these to be strategic polices. In this context the allocation for Hingham

for residential development are understood to be strategic and Policy 7.3 intended that at least 100 new dwellings will be provide on allocated sites within the Town.

- We would consider that the specific site allocations to meet those strategic targets which are within Document 2 titled “The Sites” are not considered strategic in the context of the overall plan, but it is expected that the total site allocations within each settlement will meet that strategic allocation for that settlement.
- If the site specific allocations fail to meet the strategic allocation for the settlement, then we submit this is a breach of strategic policy. If the allocations within a settlement are amended (for example as is necessary in Hingham because of the withdrawal as not available of proposed allocation GNLPO503) then the amendment will not be contrary to strategy provided the revised allocations still fulfill at least the strategic target for the settlement
- If GNLP say about site 0503 “20 doesn’t make enough of a difference to be strategic”, as they appear to from discussions we have had with them, we would disagree. A shortfall in allocation numbers in any settlement (and specifically in Hingham) would, we say, not comply with the strategic policies of the plan and thus make the plan unsound.
- As such Clayland say that given the withdrawal of site GNLPO503 makes the plan strategically unsound in respect of Hingham. It is essential that this allocation is replaced to ensure the strategy is followed though. If our other arguments about unsoundness of allocation of GNLPO520 are accepted the required replacement site(s) would need to address the total allocation strategically intended to be provided for the Town. At that stage Inspectors need to consider the whole aspect of reasonable alternative sites, site assessment scoring and selection in approving a modification providing for alternative allocation for Hingham
- Clayland’s position is that allocation of land at Watton Road (GNLP1098) and if necessary additional land adjoining within GNLPO335 in replacement of GNLPO503 and GNLPO520 would make the plan sound and also reflect local opinion as to suitable sites in the Town for development.