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

Matter 2 Issue 2 Points 5 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. To what extent does the distribution of housing sites across the settlement hierarchy reflect a policy down approach or one of site availability or previous commitment / allocations?

- GNLP have generally adopted an approach whereby existing commitments and allocations are maintained, unless clearly not available. This is not considered an unreasonable position for them to have taken
- Where new allocations are intended, Clayland's position, on the basis of the evidence in Hingham, is that they have at a very early stage in the plan preparation process, GNLP have determined the sites they wish to support, and from that point have sought to justify that selection, by way of the site selection scoring, which has not been undertaken objectively or with an open mind, the sustainability appraisal, and in their reaction to what has been vociferously expressed local opinion via the Town Council, in opposition to the proposed allocations.
- This view appears to be shared with Hingham Town Councils whose comments to this affect are recorded in the Topic Paper on Policy 7.3
- Whilst Hingham does not have a Neighbourhood plan at present, nevertheless, greater regard ought to have been had, on the non strategic aspects of housing allocation ie site selection, to local opinion.
- Review of the site assessment criteria, as noted in Appendix B of objections, has identified unsound selection of proposed sites for allocation that would not have been justified by the process if conducted objectively.
- We do not seek to speak for other settlements or allocations where we do not have detailed knowledge, but in respect of Hingham, it is our position that site selection because of availability and heavy promotion by the developer came first, and the policy led process was then applied in a way that justified this selection.