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

Matter: 10 Issues 1-5 in relation to the following site

s) Land West of Dereham Road, Hingham (Ref GNLP0503)

Date: 2<sup>nd</sup> / 3<sup>rd</sup> March 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 Submitted GNLP Reg 19 draft on behalf of Clayland Estates Ltd, how those objections relate to the MIQs

## Are the proposed site allocations listed below soundly based? In Particular:

1. Is the allocation justified and is it supported by the evidence?

Clayland's response it that the assessment process has not been objective or robust and as a result the selection of this site for allocation is not justified. Our submitted ground of objection and supporting evidence detail why in pedestrian access route terms significant outstanding issues remain requiring, and the requirement for a continuous pedestrian link on the west side of Dereham Road to the Town centre, as identified in the policy wording, is not achievable. The clear statement by the site owners that the site is not available make the allocation unsound.

2. Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

The requirement for a continuous pedestrian link on the west side of Dereham Road to the Town centre, as identified in the policy wording, is not achievable and is therefore an over-riding constraint. The policy identifies flood risk constraints that do not exist for suitable alternatives but the assessment appears to have ignored this and the NPPF requirement to drive development to areas of lowest flood risk. The assessment of the site in this context is unsound.

3. Has the availability, viability and deliverability of the site been robustly assessed?

The site has been clearly stated by the owners to be unavailable and thus the assessment of availability was not robust

4. Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)

An unavailable site will not deliver in accordance with the trajectory

## 5. Are the detailed policy requirements that would apply to the allocation justified and effective?

When the detailed policy requirements contain an unachievable footpath link they are neither sound or effective.

In respect of the above points Clayland detailed submission provided detail of the assessment process not being conducted in a objective or consistent manner. The strategic policy for at least 100 additional dwellings in Hingham will not be met given the effective withdrawal of this site availability by the owners. An additional replacement allocation to replace this site, and, Clayland would submit, the unsound GNLP0520, is required. Clayland had previously submitted sites reference GNLP0298/0335 together with significant woodland planting adjoining at Watton Road and GNLP4011 at Hall Close which remain available and deliverable for further consideration in any modification of allocations for Hingham.

JRM 09/02/2022