

GREATER NORWICH LOCAL PLAN EXAMINATION HEARING STATEMENT

Quality Assurance

Site name:	Greater Norwich Local Plan Examination Hingham – land south of Norwich Road
Client name:	Abel Homes Ltd
Type of report:	Hearing Statement
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Signed	
Date	10 th February 2022
Reviewed by:	Sarah Hornbrook MA(Cantab) MSc MRTPI
Signed	
Date	10 th February 2022



Background

- 1.1 This Hearing Statement has been prepared by Bidwells LLP on behalf of Abel Homes Ltd (ID: 24191) in support of representations made to the Greater Norwich Local Plan.
- 1.2 This Statement seeks to address Matter 10 Housing and mixed-use allocations - new sites without planning permission that are allocated for less than 500 dwellings, with specific regard to the following site which is being promoted by Abel Homes Ltd:
- p. Land south of Norwich Road, Hingham (GNLP0520)

Response to Inspector's Questions

Matter 10 asks are the proposed allocations listed below soundly based. In particular:

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

- 1.3 The allocation of land south of Norwich Road, Hingham (GNLP0520) is considered to be fully justified and supported by evidence.
- 1.4 As demonstrated in the Key Service Centre Assessment (Hingham Booklet), the site has been selected as a suitable site following a rigorous and robust assessment, which includes an assessment of reasonable alternatives.
- 1.5 As detailed in the representations submitted to the Regulation 19 Publication on behalf of Abel Homes Ltd (ID:24191), the site is located on the edge of a Key Service Centre, which is identified in the draft Greater Norwich Local Plan as a sustainable location for development. Furthermore, based on the evidence provided within the representations, the proposed allocation is clearly suitable, available, achievable and viable, and is deliverable within the first five years of the plan period.
- 1.6 The Key Service Centre Assessment (Hingham Booklet) and aforementioned representation demonstrate that there are no constraints that would affect the suitability of the site for residential development and that the allocation is appropriate and supported by evidence.

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

- 1.7 The Key Service Centre Assessment (Hingham Booklet), which includes a summary of the HELAA, details how a range of potential environmental and other constraints, including flood risk, heritage, landscape and highways, were initially considered in order to identify 'reasonable alternative' sites.
- 1.8 Pursuant to this, the Sustainability Appraisal referenced within the Key Service Centre Assessment (Hingham Booklet) has adopted a scoring system and assessment narrative to assess the performance of each of the reasonable alternative sites and, where appropriate, identify appropriate mitigation. As part of this process, discussions have been held with key consultees, notably the highway authority, children's services, the LLFA and the Council's

Development Management Team. As a result of this considered assessment process, Preferred Sites have been identified and sites allocated.

- 1.9 In addition, the representations submitted to the Regulation 19 Publication on behalf of Abel Homes Ltd (ID:24191) are informed by a substantial amount of technical evidence demonstrating the suitability of the site, having regard to both potential constraints and the ability to implement mitigation required by draft Policy GNLP0520. More specifically, the representations are supported by an Indicative Masterplan which demonstrates that the site can be developed to provide at least 80 dwellings, having regard to a range of issues, including Tree Preservation Orders (TPO), heritage assets, access requirements, including pedestrian access, flood risk and surface water drainage.
- 1.10 In terms of flood risk and surface water drainage, since the Regulation 19 Publication further work has been undertaken in relation to the site's surface water drainage strategy, including pre-application discussions with the LLFA. The additional work, which was submitted to the Greater Norwich Development Partnership in July 2021(D2.105.1), demonstrates that the site is not susceptible to surface water flooding and that the proposed development is capable of delivering a surface water drainage strategy that complies with both draft Policy GNLP0520 and the NPPF.
- 1.11 In particular it should be noted from the indicative layout that any risk from the overland flow route can easily be mitigated and indeed given that the vast majority of the aforementioned flow route originates to the north and north east of the site from Norwich Road, which currently has no formalised drainage, the presence of these flows will be significantly reduced by the installation of formal drainage as part of the off-site highways works.
- 1.12 On this basis, it is evident the potential constraints to development on the site have been fully considered and that mitigation required by Policy GNLP0520 can be achieved.

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

- 1.13 Abel Homes have a proven track record of delivering high quality residential schemes in Norfolk. Abel Homes have signed a Statement of Common Ground with the Greater Norwich Development Partnership (D2.105), which confirms that having regard to the requirement of Policy GNLP0520 and other policies, the site is available, viable and deliverable.
- 1.14 It is the intention of Abel Homes Ltd to submit a Planning Application for the site as soon as possible following the adoption of the GNLP.
- 1.15 Accordingly, the availability, viability and deliverability of the site is considered to have been robustly assessed.

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

- 1.16 The Statement of Common Ground between the Greater Norwich Development Partnership and Abel Homes (D2.105), includes commentary on the expected delivery of the site, which is consistent with the trajectory within Document 3.2C. Abel Homes remain committed to the delivery of the site in accordance with the commentary with the Statement of Common Ground.

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

- 1.17 Abel Homes fully support the allocation of the site under Policy GNLP0250 for residential development. As referenced above, the representations submitted to the Regulation 19 Publication on behalf of Abel Homes Ltd (ID:24191) are supported by an Indicative Masterplan alongside detailed off-site highways plans which demonstrates that the site can be developed in accordance with the detailed requirements of Policy GNLP0250.
- 1.18 However, to ensure that the policy is both justified and effective, minor alterations are proposed to the wording of policy.
- 1.19 To ensure the policy is consistent with other policies in the Local Plan, it is recommended that rather than approximately 80 homes, the policy refers to at least 80 homes. Based on 80 dwellings and the preferred allocation's site area of 6.92 ha, the density of the development equates to 11.6 dwellings per hectare (13.43 dwellings per net hectare). This figure is considerably lower than the indicative minimum density set out in Policy 2 of the draft GNLP and the density of the adjoining development. Accordingly, it is evident that the site has capacity to accommodate at least 80 dwellings.
- 1.20 From reviewing Appendix 11b Reg 19 Sites reps summaries & responses (A8.20), we understand that the Greater Norwich Development Partnership have no objection to this change.
- 1.21 Policy GNLP0520 requires frontage footpaths along the site's entire frontage. The access drawings prepared in support of the representations submitted to the Regulation 19 Publication demonstrate how footpath links can be provided to the north-east and northwest of the site, and to the west, without, crucially, impacting upon the TPO to the north of the site.
- 1.22 On this basis, whilst it is acknowledged that the location of the footpaths will be explored as the detailed design progresses, to ensure the policy is justified and effective it should incorporate a degree of flexibility to make it clear that footpaths will not be required to be provided along the site's entire frontage, if it can be demonstrated that their provision is neither necessary, practical or feasible.

Suggested Revisions / Modifications

Policy GNLP0520

Land south of Norwich Road, Hingham (approx. 6.92 ha) is allocated for residential development. This will accommodate approximately at least 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:

1. TPO oak trees on south side of Norwich Road to be retained.
2. Design and layout of the site to create an active frontage along Norwich Road and show regard to the site's gateway role.

3. Provision of an adequate visibility splay incorporating footways, to be provided along the whole site frontage, ~~unless it can be demonstrated that the provision of footpaths along the entire frontage is neither required, practical or feasible.~~
4. Pedestrian refuge in the proximity of Ironside Way, to access local employment opportunities.
5. Connectivity of the site to Public Right of Way (PRoW Hingham F9).
6. Mitigation and further investigation with regards to the site's susceptibility to surface water flooding.
7. Avoid contamination of groundwater.
8. Mitigation of impacts on Sea Mere SSSI.
9. 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.

Key

Red Text – Proposed Amendments

~~Strike through~~ – Proposed Text to be Removed

