

Hingham Town Council response to the GNLP consultation – as submitted online 16.03.2020

Responses to both the Strategy/Policy Document, Preferred Site options and Site Assessments.

(The following statement was submitted under question 1 of the Strategy/Policy document)

Hingham Town Council, in preparing this response to the GNLP consultation, have gathered public opinion through Councillor attendance at the GNLP Hingham roadshow event on 25th February, corresponded and met with members of the GNLP team, received and discussed correspondence and held a dedicated GNLP public participation session at the Town Council meeting on 03 March 2020.

The GNLP consultation documents have been made available by the Town Council in Hingham Library, and at the February and March Town Council meetings. The site assessment booklet, preferred sites booklet and policy/strategy documents have been discussed extensively by Councillors via email and at the March Town Council meeting. Comments from the public and Councillors, both oral and written were collated and publicly relayed at the March Town Council meeting, at that meeting the Town Council agreed its outline response to the GNLP consultation.

An overriding consensus was that the GNLP consultation was poorly advertised (other than on social media), insufficient notice was given to enable the road show event to be advertised in the Parish Magazine, the road show was not organised in liaison with the Town Council, the GNLP website is not user friendly, with information being difficult to find, and the alternative ways of responding to the GNLP (other than using the website) were not sufficiently advertised. It is felt that the consultation process was not inclusive to all members of the community and was viewed by some residents as "pointless" as they considered that their comments would not be considered as they felt that the preferred sites allocations were a "done deal".

With specific reference to the site assessments, the Town Council consider that there are a number of contradictions within the site assessments and the sites put forward as preferred options for housing development and the decision on some sites to be deemed unsuitable, are extremely flawed.

Hingham Town Council would like to thank the members of the GNLP team who have engaged with the Town Council, listened to and taken on board these comments.

Hingham Town Council has signed the pledge to support the CPRE campaign objecting to any new sites being allocated for house building in revised local plans to 2038 until all existing allocations in current core strategies have been developed.

The Town Council's overriding response to the GNLP is to have a preference for no further development in Hingham, having already had several areas of housing development within the Town over the years, yet with little/insufficient improvement to the infrastructure to support the growth of the Town.

Under the GNLP, Hingham are being asked to accept 100 new homes, on top of the existing commitment of 16 homes and on top of that, an unknown number of new homes through small "windfall" development sites. The Council believe that this growth is not sustainable, without improvement to the existing infrastructure and facilities of the town.

Smaller sized gradual development may be less impactful on the existing infrastructure and facilities.

To be able to build and sustain a "stronger community", development in the Town needs to provide adequate affordable housing for local families, a range of suitable housing for a diverse population, housing in appropriate locations. Supporting infrastructure is required, such as provision of improved footways and pedestrian priority crossing points in key locations within the Town, road safety improvements to the "Fairland crossroads", increased capacity at the primary school, a purpose built public car park within easy walking distance of the town centre, provision for green travel such as provision of publicly available vehicle charging points, extended green space for sports facilities, provision for an extension to the cemetery.

Hingham Town Council have recently acknowledged the Climate Emergency, any development need to address and mitigate environmental impact, including in terms of sustainability, green issues, pollution, and wildlife habitat.

Hingham Town Council is committed to working to try to secure the best outcomes for the community and to ensure that the infrastructure is adequate to support residents to be able to use local businesses and in turn enable those businesses to thrive.

The GNLP is set to run until 2038, by which time children now at the primary school will be seeking employment, they will need transport, they will need housing that they are able to afford to enable them to remain in a community where they grew up, if they so wish. Children not yet born will need to access both primary and secondary education. The GNLP needs to deliver adequate provision (alongside housing) to sustain both the community as it is today and tomorrow and the community that will be come 2038.

Preferred sites

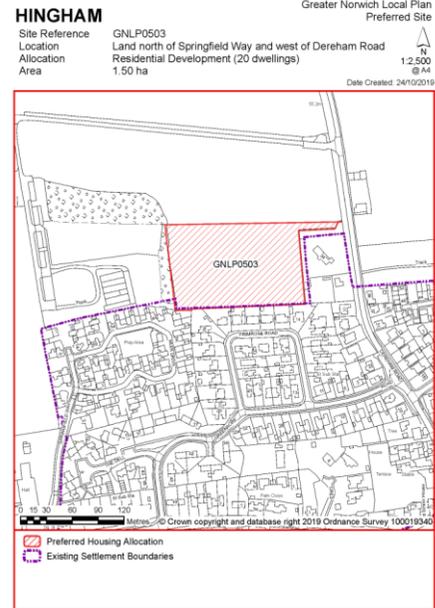
POLICY GNLP0503 Land north of Springfield Way and west of Dereham Road, Hingham (approx. 1.50 ha) is allocated for residential development. This will accommodate at least 20 homes, 33% of which will be affordable.

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:

- The provision of a safe access onto Dereham Road, including promotion of a Traffic Regulation Order to extend the existing 30mph speed limit along the site frontage.
- Provision of a continuous footway at the west side of Dereham Road from the site access to Pottles Alley.
- The design and layout of the scheme will need to consider and mitigate potential amenity impacts of the neighbouring farm operations.
- Design and layout of the scheme will need to consider and mitigate the areas of surface water flood risk.
- The area of trees to the west of the site will be protected, enhanced and incorporated into the scheme.

Notes GNLP0503: This site is proposed for allocation on a reduced boundary. Development of up to 20 dwellings would be acceptable subject to provision of a safe access and a continuous footway at the west side of Dereham Road from the site access to Pottles Alley. A 30mph speed limit extension would be required to include the site frontage. Minor carriageway widening may also be required.



HINGHAM TOWN COUNCIL COMMENTS POLICY GNLP0503

Hingham Town Council object to any new sites being allocated for house building in revised local plans to 2038 until all existing allocations in current core strategies have been developed.

Hingham Town Council object to site GNLP0503 being allocated as a preferred option for development.

The Council do not believe that the “Provision of a continuous footway at the west side of Dereham Road from the site access to Pottles Alley” is achievable, this is demonstrated by the existing footpath on the west side of Dereham Rd terminating by number 20 Dereham Rd, before being able to recommence outside number 8 Dereham Rd.

To access the nearest Norwich Bound bus stop via the footway, the Dereham Rd must be crossed twice by pedestrians, in addition the B1108 must be crossed to access the Watton Bound bus stopping point - where there is no defined pedestrian crossing point.

There are road safety concerns regarding additional traffic on the Dereham Road.

Adherence to the 30 mph speed limit is already poor and moving the speed limit north will not mitigate this.

Between Baxter Road and Pottles Alley, many residential properties are reliant on “on street” parking, making this a “pinch point” on the road where continual 2 way traffic is prevented. This issue has more recently become more prevalent with the occurrence of daily parking on the Dereham Road, alongside the Fairland Green, from Pottles Alley to the B1108 junction.

Dereham Road is subject to heavy use by agricultural vehicles.

The site assessment suggests that “Minor carriageway widening may also be required” but does not establish at what point on Dereham Road this would occur and therefore if it would be possible.

There are already long standing concerns regarding the B1108 Fairland Crossroads junction. Junction safety improvements are essential, to support any development in Hingham.

GNLP0503 development would be visually impactful upon the approach to Hingham.

GNLP0503 is documented as being within the 3000m buffer zone to SSSI. In the context of the climate emergency, where several species of wildlife native to Britain are becoming extinct or at risk of extinction the Council are concerned to ensure that housing developments are not built on areas where rare species of wildlife may exist, or indeed, where extension of the urban area will contribute to the depletion of wildlife. Should housing development take place wildlife habitat should be preserved, protected, enhanced and improved.

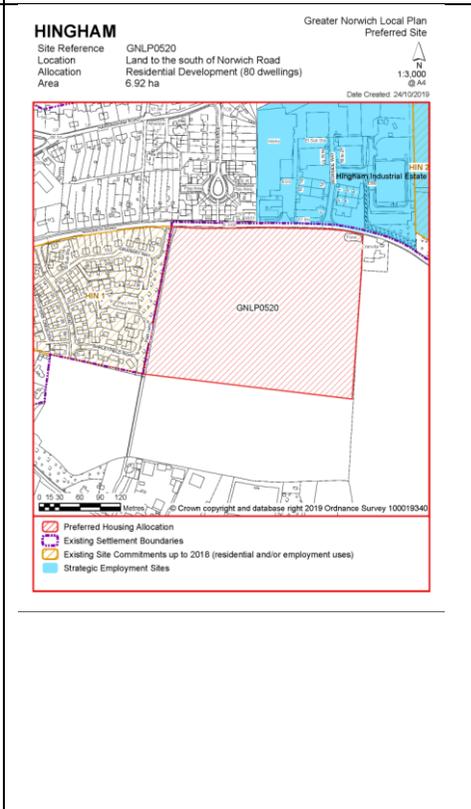
Hingham Town Council note that this is a small scale development and the Council are of the opinion that smaller scale developments spread over the life of the plan (at a time when housing need was proven) would be preferable, as would the provision of affordable housing for local people.

POLICY GNLP0520 (part of) Land south of Norwich Road, Hingham (approx. 6.92 ha) is allocated for residential development. This will accommodate approximately 80 homes, 33% of which will be affordable.

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: TPO oak trees on south side of Norwich Road to be retained.

- Design and layout of the site to create an active frontage along Norwich Road.
- Provision of an adequate visibility splay incorporating footways, to be provided along the whole site frontage.
- Pedestrian refuge in the proximity of Ironside Way, to access local employment opportunities.



HINGHAM TOWN COUNCIL COMMENTS

POLICY GNLP0520

Hingham Town Council object to any new sites being allocated for house building in revised local plans to 2038 until all existing allocations in current core strategies have been developed.

Following the GNLP roadshow (Hingham, 25th February), it is clear that there is largescale and vehement objections within the community to Norwich Road being further developed.

Having regard to the comments, concerns and representations made by residents, Hingham Town Council object to site GNLP0520 being allocated as a preferred site and object this site being allocated for further housing development on the Norwich Road.

Many of the concerns raised in relation to the development of GNLP0520 also have regard to the newly built Hops development (ref HIN1) and that development of GNLP0520 would further exacerbate the existing and/or give rise to similar issues.

These issues are predominately surface water and flooding concerns, a lack of adequate pedestrian links to the town centre, road safety and a permanent detrimental visual impact on the approach to the Hingham

- Connectivity of the site to Public Right of Way (PROW) Hingham F9.

Notes GNL0520: This site is proposed for allocation on a reduced boundary to avoid areas of surface water flood risk and historic environment impacts. The site is well located on the approach into the village adjacent to the existing allocated site. The allocation is subject to provision of adequate visibility splays and layout of the development to create an active frontage at B1108. Footways need to be provided at the site frontage, along with a pedestrian crossing refuge in the vicinity of Ironside Way. Consideration should also be given to connectivity with PROW Hingham F9.

which is a Historic Town with a substantially sized conservation areas and many listed buildings.

Flooding – residents on The Hops have stated that there is inadequate surface water drainage on the estate and surface water run off from the B1108 is substantial during heavy rainfall. Residents at the southern end of the development have advised that there are issues with damp in their homes and waterlogging of gardens.

Residents on the lower lying Seamere Road and Mill Corner (which is within the conservation area), raised concerns regarding flooding prior to the Hops being built. The surface water drainage system from the Hops development requires the co-operation of three private landowners and two public bodies to co-ordinate and manage its maintenance, the Lead Flood Authority does not consider this to be its responsibility. Surface water from The Hops is attenuated into a pond which then flows into the ditch system. Insufficient time has elapsed to establish if flooding concerns have been mitigated, as overtime the pond and ditch system will become silted and overgrown, and it had already proven difficult to secure any satisfactory maintenance of this drainage system due to multiple responsibilities for maintenance i.e the system is the responsibility of several bodies/individuals (NCC Highways, 3 private landowners and Anglian Water).

Residents south of The Hops were told that the new system would improve the situation in Seamere Road but this has not happened since all water from Norwich Road, Ringers Lane, Bears Lane, Bears Close and Drinkwater Close, together with that from the Hops, ends up in the roadside ditches in Seamere Road between Mill Corner and the bottom of the footpath.

It is also of concern that the agricultural land to the south of The Hops is now becoming waterlogged, low yielding and unfarmable – a resident has commented “the land is very wet, we got flooded last year we lost the surface of the track too, A Resident has dug the ditch out behind us and we have replaced the pipe under the footpath /bridge with a much bigger pipe, A resident in the front row of cottages got flooded too,. Crop is growing in the field but field is very wet”

The site assessment states “GNL0520: This site is proposed for allocation on a reduced boundary to avoid areas of surface water flood risk and historic environment impacts”. Allocating GNL0520 on a reduced boundary than initially put forward does not prove mitigation

of surface water flooding concerns and/or concerns over the impact of surface water run off on the lower lying Seamere Rd/Mill Corner now and over time. The site assessment, with reference to flooding, advised –“ Mitigation required for heavy constraints”.

Where it is clear that flood mitigation is required – such as with GNLPO520 the GNLPO team should actively seek information from residents affected by or potentially affected by flooding in the vicinity of a proposed site allocation for housing development, prior to that site being approved, rather than accepting the submittance from the developers that flooding has been / can be mitigated.

Inadequate pedestrian links to the town centre - It has already been noted in the site assessment that children would have to cross the B1108 to access a footway to enable them to walk to the primary school. When The Hops was built, adequate provision for pedestrians to walk from the development to the Town Centre (the Market Place) and beyond was not achieved and no pedestrian priority crossing point was provided.

A section of footway between The Hops and Bears Lane could not be provided due to land ownership. During the time The Hops was built, the land which could have provided provision of a footpath became available for sale, and has subsequently been sold. The developer of The Hops (and promotor of GNLPO520) did not purchase the land to enable the lack of footway (between The Hops and Bears Lane) to be rectified.

A pedestrian refuge was provided (at the point where the footway ends outside The Hops at the western end), in theory to assist residents of The Hops to cross the B1108, however there is poor visibility (crossing from The Hops) due to the existing hedge between The Hops and Bears Lane and it is often difficult to see if vehicles are approaching on the wrong side of the carriage way, to overtake parked vehicles on the north side of the road in the vicinity of the pedestrian island. The existing danger due to the crossing point not having pedestrian priority and the lack of visibility to the left is more acute for (those such as) wheelchair users, pedestrians with children and pushchairs due to them naturally not being able to stand on the kerb edge to look for oncoming traffic. The Town Council are aware of reports of a child being hit by a van at this location. The Town Council have requested

NCC highways provide white H marking on the road to try to prevent parking in the vicinity of the pedestrian refuge, so far NCC have refused.

The lack of a section of footway between The Hops and Bears Lane means that pedestrians have to cross the B1108 to access the footway alongside the B1108 to then walk toward the centre of Hingham. Pedestrians have to cross the B1108 a second time to access the Co-op shop, cross the B1108 3 times to access the Pharmacy/businesses on Bond Street and The Fairland (due to the very narrow footway by Beaconsfield House) and cross the B1108 4 times to access the Lincoln ("village") Hall and Library. This lack of adequate pedestrian links into the centre of town, may discourage residents at GNLPO520 from walking to and using the small independent businesses within the Town centre. Other sites in Hingham on the B1108, assessed during the GNLPO process have been deemed unsuitable due to lack of adequate pedestrian provision (GNLPO298, GNLPO335), yet GNLPO520 has been deemed suitable (and the Hops has been built) without the provision of an adequate pedestrian link into the centre of Hingham. There is a clear inconsistency and contradiction demonstrated in the site assessment process.

There is NO point on the B1108 (or anywhere in Hingham) where priority is given to pedestrians crossing the road, this needs to be rectified. Development of GNLPO520 would be contrary to GNLPO policy 2 "1. Access to services and facilities -

Developments are required to provide convenient, safe and sustainable access to new on-site services and facilities or to existing facilities as appropriate. This reduces the need to travel and provides local access to services and facilities, supporting their viability"

GNLPO Policy 5 states "Residential proposals should address the need for homes for all sectors of the community having regard to the latest housing evidence, including a variety of homes in terms of tenure and cost. New homes should provide for a good quality of life in mixed and inclusive communities and major development proposals should provide adaptable homes to meet varied and changing needs". Providing homes to meet "varied and changing needs" in Hingham MUST come with a commitment to provide the infrastructure to

support those residents, including pedestrian priority crossing facilities in an appropriate location (locations) to ensure that ALL residents, including those who have mobility issues/slowness and visual impairments are able to cross the increasingly busy B1108 (where adherence to the speed limits is poor) as a priority over vehicles and be able to cross the road in safety.

Hingham has a high percentage of elderly residents, and statistics show that people are living longer, it is therefore essential that, in order to support any development in Hingham, the town receives improvements to the footways and crossing points to allow elderly and very elderly residents to walk around the town without fear of trips and falls on uneven and narrow footways or fear from crossing the busy B1108 due high volumes of vehicles and speeding traffic

Without adequate pedestrian provision, the development of GNLP0520 would be contrary to the GNLP policy 2 “Sustainable Communities” with regard to convenient and safe access to services and facilities, promoting active travel, and minimising pollution, as it would be reasonable to suspect that residents from a development on GNLP0520 would drive to access businesses in the centre of town and facilities such as Library, Village Hall, Sports Centre. There are long held concerns regarding on road and dangerous parking practices in Hingham. Being that there is no public car park and businesses in the Market Place and Fairland have no dedicated parking for staff or customers, it would be unlikely to achieve provision for green travel (outside of that of providing private charging points within a development) such as provision of publicly available vehicle charging points. Parking facilities at the Lincoln Hall/Bowls Club/Library and the Sports Centre are inadequate in size to accommodate visitors to these venues during busy times.

Detrimental visual impact on the town – many residents who attended the GNLP roadshow consider that The Hops has had a detrimental visual impact on the Norwich Road approach to Hingham, with concerns that the development is not in keeping with the town and will not “age well”, it has even been called an “eyesore”. The Town Council consider that further development of the Norwich Road (GNLP0520) in particular with the “active frontage” suggested, would have a further

detrimental visual impact on the Town by creating a corridor approach to Hingham which would permanently further alter the aesthetic of a historic town. By developing GNL0520 and combining the visual impact with that of The Hops would produce the perceived vision of one large new development on the approach to the Historic part of Hingham and it is a concern that this would create a perception of a “separate community” that may not integrate well into the existing community of Hingham

There would be significant loss of views over open countryside. Again there is inconsistencies within the assessment process, included in the reasons that GNL0502 was considered unsuitable is “development in this location would encroach into open countryside with a resulting impact on form and character.” - however GNL0520, being much more visible on the approach to Hingham would have a greater impact on form and character and would also encroach on open countryside. The arguments put forward in favour of The Hops development in 2014 maintained that the site’s sloping nature would cause “minimised visual impact” on the approach to Hingham from the East and “preserve the visual of the tree line with the church tower above”. This argument and necessity seems to have been abandoned.

Because of the topography of the area GNL0520 is at its highest point where it borders Norwich Road (sloping southwards) it is also situated higher than The Hops development. A development on GNL0520 would be visible for some distance, especially to the South and East and would be contrary to GNL Policy 2 requiring developments to “Respect, protect and enhance landscape character, taking account of landscape character assessments or equivalent documents, and maintain strategic gaps and landscape settings, including river valleys, undeveloped approaches and the character and setting of the Broads;” Development of GNL0520 would also be contrary to Policy 3 “The Natural Environment Development proposals will be required to conserve and enhance the natural environment. Key elements of the natural environment include valued landscapes” ... it is clear from residents objections that the loss of such prominent and valued open landscape by developing GNL0520 would definitely not “conserve or

enhance the natural environment”, but permanently destroy it, on the approach to Hingham via the Norwich Road.

GNLP0520 is documented as being within the 3000m buffer zone to SSSI. In the context of the climate emergency, where several species of wildlife native to Britain are becoming extinct or at risk of extinction the Council are concerned to ensure that housing developments are not built on areas where rare species of wildlife may exist, or indeed, where extension of the urban area will contribute to the depletion of wildlife. Should housing development take place wildlife habitat should be preserved, protected, enhanced and improved.

The houses along Seamere Road/Mill Corner, including listed buildings, will be negatively affected by flooding and decimation of rural situation.

Arable land south of both The Hops and GNLP0520, designed to assist with surface water flooding will become unusable, inaccessible and waterlogged - as has already occurred with the land south of The Hops. By developing GNLP0520, the land south of The Hops/GNLP0520 will have no road access for agricultural vehicles.

Development size – “approximately 80 homes, 33% of which will be affordable. More homes may be accommodated, subject to an acceptable design and layout being achieved”.

Hingham Town Council are concerned that the development of 80 houses (with imminent deliverability) (alongside 20 more allocated within the plan, 16 existing commitment and unknown number of “windfall” properties) is not sustainable with regard to the Towns facilities. There are concerns regarding the pressures that will be placed on the Primary School and Dr’s Surgery (without any consideration as to how developments in neighbouring Breckland will also add to the number of people needing to access services in Hingham). Both the Drs surgery and Primary School are located on Hardingham Street, on road parking to access these facilities is a daily occurrence, causing pollution, congestion and parking on pavements. It is reasonable to assume that many parents (due to work, lifestyle) from a new development will take children to and from school by car, parking issues (e.g too many cars and parking on pavements) relating to the primary school drop off and pick up times are already cause for

concern and will be exacerbated by future housing development in the town.

It is also unreasonable to suggest (as has been suggested by the developer promoting GNLPO520) that residents from Hingham would be more inclined to work in Norwich/Wymondham and therefore a development on Norwich Road would prevent additional traffic travelling through the town and via the dangerous B1108/Fairland crossroads. It is conceivable to assume that there would be residents that would work in other locations such as Dereham and Attelborough. Dereham would also be likely to be a destination for supermarket shopping, having a large Tesco, Aldi, Lidl, pet store, Halfords, Screwfix, Roys, Homebase, Poundstretcher and a McDonalds on the Hingham side of the outskirts of Dereham.

Highway access concerns – initially GNLPO520 was put forward for the development of 250-300 homes. Highway comments in the site assessment were: “ Not feasible to achieve safe access due to presence of TPO protected trees. Comments revisited: The ability to provide access visibility splays is limited by the presence of TPO protected trees at the site frontage”.

Prior to The Hops being built, part of the planning design was to include a pedestrian refuge at the eastern end of the development, however this was not deliverable because of the presence of TPO trees, and a compromise was made with the installation of a flashing speed sign (facing east only).

It is of concern that, if the site is allocated for development, when it came to the building phase, the vision splays/safe access to GNLPO520 would not be achievable due to the presence of TPO trees, (as was the case with omitted pedestrian refuge for the eastern end of The Hops, the design worked “on paper” but not in reality).

Highways have also commented that it is thought that compliance with the 30mph speed limit is not particularly good. This gives rise to concerns over safe access onto the B1108 from GNLPO520, in particular as the road to the east has reduced visibility due to a bend. It is not acceptable to assume that changing the environment, by building houses will reduce the instances of speeding (there is no evidence to support this).

In addition to access and speeding concerns, there is also a concern regarding the proximity of the required access to GNLPO520 to the existing industrial area. Already subject to frequent movements of long wheel-base HGVs emerging slowly from a standstill from Ironside Way/A C Bacon Engineering onto the B1108/Norwich Road whilst encountering oncoming domestic traffic within 300metres of a national speed limit and entering from a blind bend. Local residents frequently note near misses between domestic and industrial vehicles at the Ironside Way/A C Bacon Engineering junctions. The allocation (carried forward) of HIN2 as an employment area (stating that the existing access of Ironside Way will be used) means that at some point there will be increased industrial traffic of unknown size and frequency exiting and accessing the industrial/employment area to and from the B1108.

Highways have commented that there would need to be a pedestrian refuge in the vicinity of Ironside Way, however the Town Council question whether this is feasible due to any carriageway widening required/presence of TPO trees and how such a refuge would impinge on the very large HGV vehicles entering/exiting the industrial area.

There are also concerns regarding the inadequacy of pedestrian refuges in providing a safe crossing point for pedestrians. Pedestrian refuge island have numerous disadvantages (in comparison to a pedestrian priority crossing point) such as motor vehicles have priority, pedestrians may have to wait much longer for a gap in vehicle traffic to cross safely, particularly in heavy traffic, compared to a Zebra or Puffin crossing. For the pedestrian to cross safely, they must have good judgement of motor vehicle speeds and gaps in vehicle traffic, which children and older people do not always have. Visually impaired people, or those with other disabilities, may find refuge islands less easy to use compared with a Zebra or Puffin crossing. Some motor vehicle drivers act dangerously near crossing islands if a cyclist is passing through. They may squeeze past the cyclist when passing the crossing island, or swerve dangerously around the cyclist just before the crossing island.

A pedestrian priority crossing point must be provided in a suitable location to support any additional development in the town.

		<p>Employment - GNLP-0520 is opposite a mixed industrial estate with current B1-B8 use and future intended use allocated as B1, B2 and B8; B2 being 'general industrial' including chemical treatment and incineration, and B1(c) uses could change or be restricted by a higher concentration of residential housing (due to noise and use of acetylene and solvents as restricted under HSE). This could effect the sustainability of this employment.</p> <p>Although HIN2 is the "designated" employment area in Hingham under the GNLP, there are no timescales for this area being developed to increase employment opportunities. There are many independent businesses in Hingham, the Co-op, agriculture and a small "industrial" area off Dereham Road that could all provide employment opportunities. Other development sites could provide better pedestrian access to the existing employment opportunities within the town</p> <p>Future development – The site assessment document stated that "GNLP0310 (Approx. 172 dwellings) is not considered to be suitable for allocation at the current time as it would need to be developed in conjunction with, or following site GNLP0520 otherwise development would be separate from the existing built form of the settlement". Allowing GNLP0520 to be developed will then open up the potential for GNLP0310 to be developed in the future. A development in this location would further exacerbate all of the issues raised in regard to GNLP0520, Development of GNLP0310 is also vehemently opposed.</p> <p>Previous consultation responses – During the previous consultation (8 January to 15 March 2018) GNLP0520 received 5 objections from residents and concerns were raised by the Town Council – the only comments in support were made by the developer of the site.</p>
--	--	---

POLICY HIN2 Land adjacent to Hingham Industrial Estate at Ironside Way, Hingham (approx. 2.24 ha) is allocated for employment uses in Classes B1/B2/B8 as an extension to the existing industrial estate.

The development will be expected to address the following specific matters:

Local road improvements and a safe access with road access to the site from the existing industrial estate at Ironside Way.

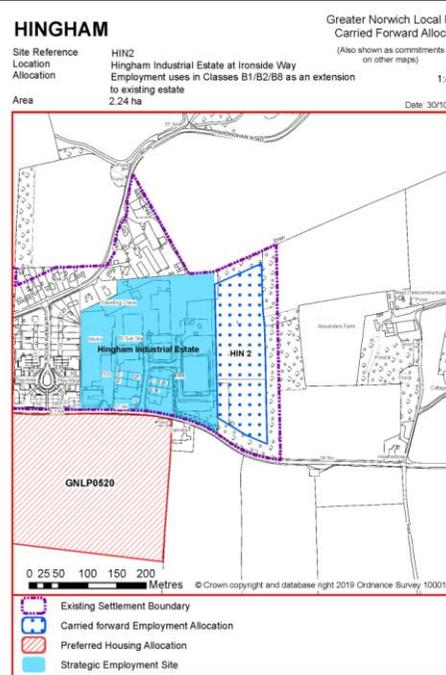
Wastewater infrastructure capacity must be confirmed prior to development taking place.

Retention of existing tree belts along northern, eastern and southern boundaries.

Historic Environment Record to be consulted to determine any need for archaeological surveys prior to development.

Notes

HIN2: The site was allocated in 2015 as part of the current local plan but has not yet been developed. The principle of development on the site has already been accepted and it is expected that development will take place within the new local plan time-period. The site is re-allocated for employment/commercial development



HINGHAM TOWN COUNCIL COMMENTS POLICY HIN2

Although HIN2 is the “designated” employment area in Hingham under the GNLP, there are no timescales for this area being developed to increase employment opportunities.

There is concern regarding the proximity of the required access to GNLPO520 to the existing industrial area. Already subject to frequent movements of long wheel-base HGVs emerging slowly from a standstill from Ironside Way/A C Bacon Engineering onto the B1108/Norwich Road whilst encountering oncoming domestic traffic within 300metres of a national speed limit and entering from a blind bend. Local residents frequently note near misses between domestic and industrial vehicles at the Ironside Way/A C Bacon Engineering junctions. The allocation (carried forward) of HIN2 as an employment area (stating that the existing access of Ironside Way will be used) means that at some point there will be increased industrial traffic of unknown size and frequency exiting and accessing the industrial/employment area to and from the B1108.

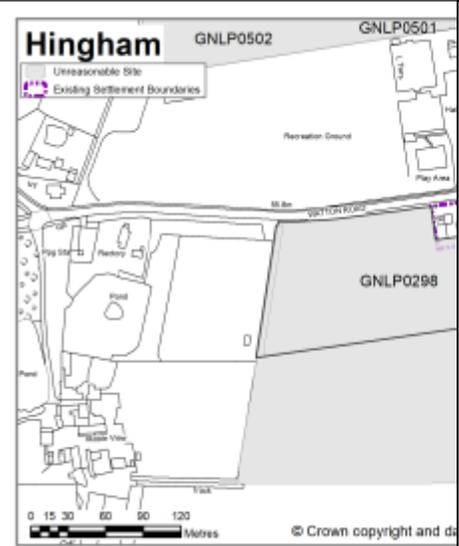
Highways have commented that there would need to be a pedestrian refuge in the vicinity of Ironside Way, however the Town Council question whether this is feasible due to any carriageway widening required/presence of TPO trees and how such a refuge would impinge on the very large HGV vehicles entering/exiting the industrial area. The existence of HIN2 should be a key factor in deeming GNLPO520 as unsuitable for housing development due to the close proximity of the 2 sites and access to them within a short distance on the same busy road.

Land west of Attleborough Road
 GNLP0273
 Residential (unspecified number)
 This site is not considered to be suitable for allocation as it is located some way from the existing settlement limit with no safe walking route to the local primary school.



HINGHAM TOWN COUNCIL COMMENTS - GNLP0273
 Hingham Town Council object to any new sites being allocated for house building in revised local plans to 2038 until all existing allocations in current core strategies have been developed.
 The Town Council support the decision to deem this site unsuitable for development

Land opposite Hingham Sports Centre, Watton Road
 GNLP0298
 Approx. 50-100 dwellings
 This site is not considered to be suitable for allocation as development here would extend the settlement further west along the B1108. It is not possible to get an adequate footway link from the site into Hingham Town centre.



HINGHAM TOWN COUNCIL COMMENTS - GNLP0298
 Hingham Town Council object to any new sites being allocated for house building in revised local plans to 2038 until all existing allocations in current core strategies have been developed.
 Hingham Town Council object to this site being deemed as unsuitable. Information has been provided by the developer promoting the site that (according to their plan) demonstrates the feasibility of a provision of a footway link to Hingham Town Centre. It is considered that this footway link would be more adequate than the footway link from GNLP0520 (Norwich Road) although the need for a pedestrian priority crossing point would need to be addressed.
 The site assessment also states that GNLP0298 has few or no flood constraints where as GNLP0520 has high flood mitigation.
 (These points highlights inconsistencies and contradictions in the site assessment process).
 The developer has advised that this site would be developed in conjunction with GNLP0335 in a phased approach with an approximate total of 150 houses. The Town Council, having concerns regarding the sustainability and impact on local amenities and facilities of such a large number of homes would like to see this number reduced. Hingham Town Council (if Hingham is forced to accept more development) would

prefer to have smaller scale/phased development that that proposed by the promotor of GNLP0520.

A development in this location would give better pedestrian access (than GNLP0520) to the towns sports facilities, village hall, library and small businesses in the Fairland and Market Place.

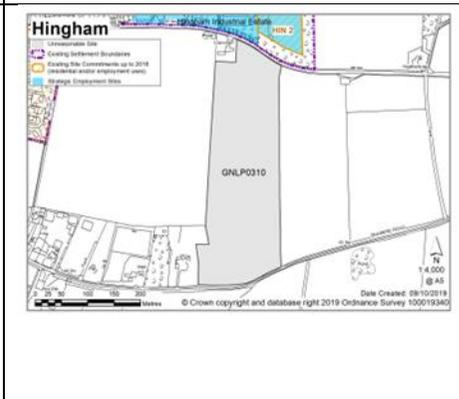
The developer has also indicated that the development would include provision for wildlife, a community woodland and could incorporate an access point from GNLP0335 (from an adopted road) to GNLP0395, which the Town Council consider should be allocated for the provision of a cemetery extension and car park (with pedestrian access to the Fairland through Rectory Gardens)

GNLP0298 is documented as being within the 3000m buffer zone to SSSI. In the context of the climate emergency, where several species of wildlife native to Britain are becoming extinct or at risk of extinction the Council are concerned to ensure that housing developments are not built on areas where rare species of wildlife may exist, or indeed, where extension of the urban area will contribute to the depletion of wildlife. Should housing development take place wildlife habitat should be preserved, protected, enhanced and improved.

A development on GNLP0298 and GNLP0335 would be likely to have a less detrimental visual impact on the approach to Hingham than GNLP0520, although the development would need to provide a range of housing (to suit varied needs) but be in keeping with the Town.

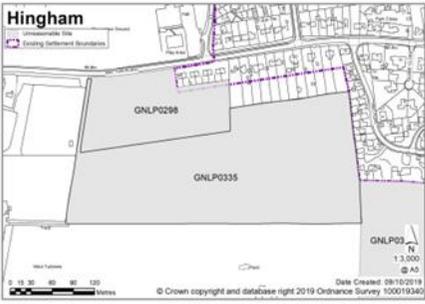
The Town Council consider that this site and the proposals made by the developer should be more fully explored as a preferred option/feasible alternative to GNLP0520, to which there are vehement objections

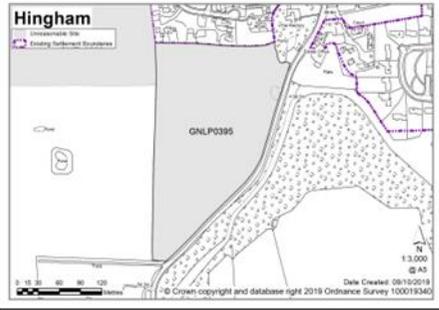
Land south of Norwich Road, north of Seamere Road
GNLP0310
Approx. 172 dwellings
This site is not considered to be suitable for allocation at the current time as it would need to be developed in conjunction with, or following site GNLP0520 otherwise development would be separate from the existing built form of the settlement. There are concerns about forward visibility; it is unlikely that adequate vehicular access could be provided without a safety concern.



HINGHAM TOWN COUNCIL COMMENTS - GNLP0310
Hingham Town Council object to any new sites being allocated for house building in revised local plans to 2038 until all existing allocations in current core strategies have been developed.

The Town Council support the decision to deem this site unsuitable for allocation – HOWEVER Hingham Town Council object to the suggestion that the site could be considered suitable if developed in conjunction with or after GNLP 0520 – due to the vehement and extensive objections stated against GNLP0520 (flooding, road safety, detrimental visual impact on an historic town, lack of adequate pedestrian facilities

		<p>to the town centre – etc). The Town Council request the this site be deemed as UNSUITABLE for housing development and that it NOT be considered for development at any future time.</p>
<p>Land south of Watton Road GNLP0335 Approx. 100-200 dwellings This site is not considered to be suitable for allocation as it would make an odd, backland form of development without the allocation of site GNLP0298, which is also considered to be unreasonable on highway grounds.</p>		<p>HINGHAM TOWN COUNCIL COMMENTS - GNLP0335 Hingham Town Council object to any new sites being allocated for house building in revised local plans to 2038 until all existing allocations in current core strategies have been developed.</p> <p>Hingham Town Council object to this site being deemed as unsuitable. Information has been provided by the developer promoting the site (in conjunction with GNLP0298) that (according to their plan) demonstrates the feasibility of a provision of a footway link to Hingham Town Centre. It is considered that this footway link would be more adequate than the footway link from GNLP0520 (Norwich Road) although the need for a pedestrian priority crossing point would need to be addressed (this point highlights inconsistencies and contradictions in the site assessment process).</p> <p>The site assessment also states that GNLP0335 has few or no flood constraints.</p> <p>The developer has advised that this site would be developed in conjunction with GNLP0298 in a phased approach with an approximate total of 150 houses. The Town Council, having concerns regarding the sustainability and impact on local amenities and facilities of such a large number of homes would like to see this number reduced. Hingham Town Council (if Hingham is forced to accept more development) would prefer to have smaller scale/phased development that that proposed by the promotor of GNLP0520</p> <p>A development in this location (GNLP0335) would give better pedestrian access (than GNLP0520) to the towns sports facilities, village hall, library and small businesses in the Fairland and Market Place.</p> <p>GNLP0335 is documented as being within the 3000m buffer zone to SSSI. In the context of the climate emergency, where several species of wildlife native to Britain are becoming extinct or at risk of extinction the Council are concerned to ensure that housing developments are not built on areas where rare species of wildlife may exist, or indeed, where extension of the urban area will contribute to the depletion of wildlife.</p>

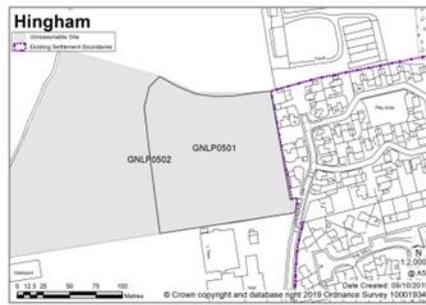
		<p>Should housing development take place wildlife habitat should be preserved, protected, enhanced and improved.</p> <p>The developer has also indicated that the development would include provision for wildlife, a community woodland and could incorporate an access point from GNL0335 (from an adopted road) to GNL0395, which the Town Council consider should be allocated for the provision of a cemetery extension and car park (with pedestrian access to the Fairland through Rectory Gardens)</p> <p>A development on GNL0298 and GNL0335 would be likely to have a less detrimental visual impact on the approach to Hingham than GNL0520, although the development would need to provide a range of housing (to suit varied needs) but be in keeping with the Town.</p> <p>The Town Council consider that this site and the proposals made by the developer should be more fully explored as a preferred option/feasible alternative to GNL0520 , to which there are vehement objections</p>
<p>Land west of Attleborough Road GNL0395 Approx. 200 dwellings</p> <p>This site is not considered to be suitable for allocation as Attleborough Road is considered too constrained and not suitable for intensification of use. The footways are narrow and there is no scope for improvement. Development of this site would also have landscape and heritage impacts.</p>	 <p>The map shows the location of site GNL0395 in Hingham. It is a large, irregularly shaped site situated west of Attleborough Road. The map includes a scale bar (0 to 100 meters), a north arrow, and a scale of 1:3,000. The map also shows other sites (GNL0298, GNL0335) and surrounding features like roads and green spaces. The map is titled 'Hingham' and includes a legend for 'Unallocated Site' and 'Creating Network Features'. The date created is 08/10/2019 and the Ordnance Survey ID is 100019340.</p>	<p>HINGHAM TOWN COUNCIL COMMENTS - GNL0395</p> <p>Hingham Town Council object to any new sites being allocated for house building in revised local plans to 2038 until all existing allocations in current core strategies have been developed.</p> <p>The Town Council support the decision to deem this site unsuitable for housing development, however the Council consider should that GNL0395 be allocated for the provision of a cemetery extension and car park (with pedestrian access to the Fairland through Rectory Gardens). Vehicular access could be achieved through GNL0298 and GNL0335.</p> <p>GNL0395 is documented as being within the 3000m buffer zone to SSSI. In the context of the climate emergency, where several species of wildlife native to Britain are becoming extinct or at risk of extinction the Council are concerned to ensure that housing developments are not built on areas where rare species of wildlife may exist, or indeed, where extension of the urban area will contribute to the depletion of wildlife. A development of a community woodland on the neighbouring GNL0335 could ensure wildlife habitat is preserved, protected, enhanced and improved.</p>

Land west of Springfield Way

GNLP0501

Approx. 41 dwellings with associated new public open space

Despite a safe pedestrian route to the primary school, the site is not considered to be suitable for allocation due to the absence of an acceptable vehicular access on to Springfield Way.



HINGHAM TOWN COUNCIL COMMENTS - GNLP0501

Hingham Town Council object to any new sites being allocated for house building in revised local plans to 2038 until all existing allocations in current core strategies have been developed.

Hingham Town Council object to sites GNLP 0501 and GNLP0502 being deemed as unsuitable. Highways have commented that there is not an achievable highway access point, however the Town Council believe that this would be achievable, using land currently owned by the Town Council to create an access point onto Springfield Way.

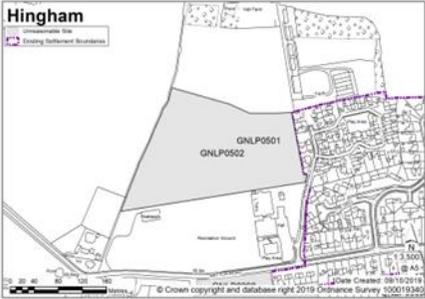
A development in this location would give better pedestrian access (than GNLP0520) to the town's sports facilities, village hall, library and small businesses in the Fairland and Market Place. Children would not have to cross the B1108 to access the primary school (as they would from GNLP0520). Although it is considered that this footway link would be more adequate than the footway link from GNLP0520 (Norwich Road), the need for a pedestrian priority crossing point on the B1108 would need to be addressed.

A development on GNLP0501 would be likely to have a less detrimental visual impact on the approach to Hingham than GNLP0520, although the development would need to provide a range of housing (to suit varied needs) and be in keeping with the Town. Hingham Town Council (if Hingham is forced to accept more development) would prefer to have smaller scale/phased development that that proposed by the promotor of GNLP0520

The site assessment also states that GNLP0501 has few or no flood constraints (GNLP0520 has high flood mitigation).

GNLP0501 and GNLP0502 is documented as being within the 3000m buffer zone to SSSI. In the context of the climate emergency, where several species of wildlife native to Britain are becoming extinct or at risk of extinction the Council are concerned to ensure that housing developments are not built on areas where rare species of wildlife may exist, or indeed, where extension of the urban area will contribute to the depletion of wildlife. Should housing development take place wildlife habitat should be preserved, protected, enhanced and improved.

The Town Council believe that a development on GNLP0501 in conjunction with land from GNLP0502 could provide a much needed

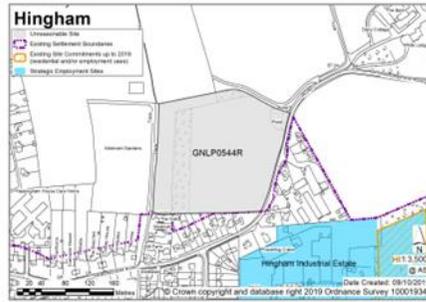
		<p>extension to the playing field and sports centre car parking facilities, which are inadequate to support a growing community. Objections raised against development of GNLPO501 and GNLPO502 have focused on the problem of on road parking on Springfield Way and Watton Road during popular events held at the sports centre, development of these areas and provision of land for additional sports and car parking facilities could alleviate these issues with on road parking.</p> <p>The Town Council consider that there needs to be a dialogue between the land owner/promoter/Hingham Town Council to further explore the feasibility of developing GNLPO501 in conjunction with using land from GNLPO502 and an access point owned by the Town Council as the Council believe that this could bring substantial benefits to the community in terms of additional sports facilities and associated car parking. The Town Council therefore request that GNLPO501 (in conjunction with GNLPO502) be designated as a preferred option/feasible alternative to GNLPO520, to which there are vehement objections</p>
<p>Land west of Springfield Way GNLPO502 Approx. 91 dwellings with associated new public open space Despite a safe pedestrian route to the primary school, the site is not considered to be suitable for allocation due to the absence of an acceptable vehicular access on to Springfield Way. The site area is constrained by flood risk and development in this location would encroach into open countryside with a resulting impact on form and character.</p>		<p>HINGHAM TOWN COUNCIL COMMENTS - GNLPO502 Hingham Town Council object to any new sites being allocated for house building in revised local plans to 2038 until all existing allocations in current core strategies have been developed.</p> <p>Hingham Town Council object to sites GNLPO501 and GNLPO502 being deemed as unsuitable. Highways have commented that there is not an achievable highway access point, however the Town Council believe that this would be achievable, using land currently owned by the Town Council to create an access point onto Springfield Way.</p> <p>A development in this location would give better pedestrian access (than GNLPO520) to the town's sports facilities, village hall, library and small businesses in the Fairland and Market Place. Children would not have to cross the B1108 to access the primary school (as they would from GNLPO520). Although it is considered that this footway link would be more adequate than the footway link from GNLPO520 (Norwich Road), the need for a pedestrian priority crossing point on the B1108 would need to be addressed.</p> <p>A development on GNLPO501 would be likely to have a less detrimental visual impact on the approach to Hingham than GNLPO520, although the development would need to provide a range of housing (to suit</p>

		<p>varied needs) and be in keeping with the Town. Hingham Town Council (if Hingham is forced to accept more development) would prefer to have smaller scale/phased development that that proposed by the promotor of GNLPO520</p> <p>The site assessment also states that GNLPO501 has few or no flood constraints (GNLPO520 has high flood mitigation).</p> <p>GNLPO501 and GNLPO502 is documented as being within the 3000m buffer zone to SSSI. In the context of the climate emergency, where several species of wildlife native to Britain are becoming extinct or at risk of extinction the Council are concerned to ensure that housing developments are not built on areas where rare species of wildlife may exist, or indeed, where extension of the urban area will contribute to the depletion of wildlife. Should housing development take place wildlife habitat should be preserved, protected, enhanced and improved.</p> <p>The Town Council believe that a development on GNLPO501 in conjunction with land from GNLPO502 could provide a much needed extension to the playing field and sports centre car parking facilities, which are inadequate to support a growing community. Objections raised against development of GNLPO501 and GNLPO502 have focused on the problem of on road parking on Springfield Way and Watton Road during popular events held at the sports centre, development of these areas and provision of land for additional sports and car parking facilities could alleviate these issues with on road parking.</p> <p>The Town Council consider that there needs to be a dialogue between the land owner/promoter/Hingham Town Council to further explore the feasibility of developing GNLPO501 in conjunction with using land from GNLPO502 and an access point owned by the Town Council as the Council believe that this could bring substantial benefits to the community in terms of additional sports facilities and associated car parking. The Town Council therefore request that GNLPO501 (in conjunction with GNLPO502) be designated as a preferred option/feasible alternative to GNLPO520 , to which there are vehement objections</p>
--	--	---

Swan Field, Hardingham Road
GNLP0544R

Up to 96 dwellings

This site is not considered to be suitable for allocation due to highways constraints. The narrowness of the carriageway and the lack of a continuous footpath is compounded by the very poor forward visibility for vehicles travelling around the adjacent bend on Hardingham Road



HINGHAM TOWN COUNCIL COMMENTS - GNLP0544R

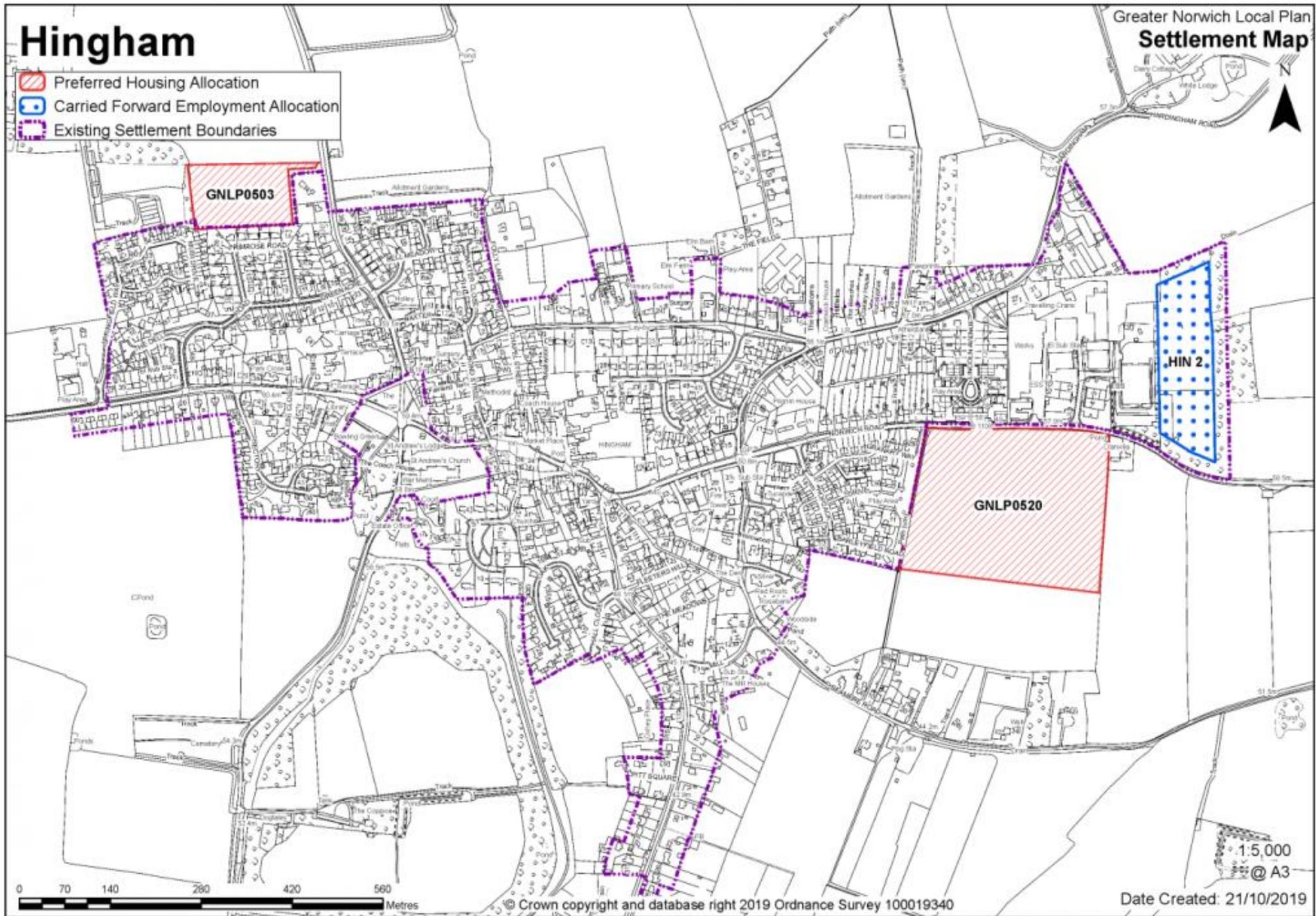
Hingham Town Council object to any new sites being allocated for house building in revised local plans to 2038 until all existing allocations in current core strategies have been developed.

Hingham Town Council support the decision that site GNLP0544R is unsuitable for development.

The land is located off a narrow road without a continuous footway (with bends and poor visibility), which the infrastructure would not be suitable to sustain the additional traffic created by a development - the road is not be suitable to sustain the nature of the traffic during development/building. The additional traffic also would give rise to road safety concerns, being near the primary school and doctors surgery, an area already congested during school drop off and pick up times.

Hingham

-  Preferred Housing Allocation
-  Carried Forward Employment Allocation
-  Existing Settlement Boundaries



1:5,000
@ A3

Date Created: 21/10/2019

Comments on the strategic policy document

From the policy document

Hingham Town Council comments

POLICY 1 – THE SUSTAINABLE GROWTH STRATEGY	
<p>Do you agree with the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?</p>	<p>Hingham Town Council consider the Hierarchy to be flawed. Several parishes have been designated as Key Service Centres, at no point in the document is there a definition for a “Key Service Centre”. The lack of concrete criteria for a “Key Service Centre” renders the designation of such an entity meaningless.</p> <p>Hingham Town Council object to any new sites being allocated for house building in revised local plans to 2038 until all existing allocations in current core strategies have been developed.</p> <p>There is no evidence in the policy document of commitment to improved infrastructure in Hingham to enable the town to sustain the quoted 120 new homes, in particular additional primary school places and improvements to the road and footway network in the town.</p>
<p>Do you support, object or wish to comment on the approach for housing numbers and delivery?</p>	<p>Hingham has a allocation of 120 new homes (including 16 existing commitment), however the consideration of Windfall sites as being “acceptable in principle” – of sites of up to 3 homes within each parish would mean the ACTUAL homes that will be delivered is potentially unquantifiable (Policy 7.5 is ambiguous in its meaning and needs clarification).</p> <p>Housing figures are not discussed inline with actual need within the community or taking into account the number of vacant properties already in existence.</p> <p>Hingham Town Council have been told that “deliverability” is a key component to housing development site allocation. The Council would like to state that just because something is deliverable it does not mean that it is right for a community, and there are concerns regarding the push to deliver housing development “en masse” which could potentially overwhelm the town’s facilities and infrastructure. The GNLP runs until 2038 and the Town Council are of the opinion that a phased approach to delivering smaller developments, as and when needed, with a higher focus on affordability for local people would be a more acceptable and appropriate approach.</p>
<p>Do you support, object or wish to comment on the approach for the Economy?</p>	<p>The allocation of employment locations should be considered in relation to allocation of preferred sites for housing development, and it should be considered how the 2 areas would impact on each other both positively and negatively. In Hingham a preferred site for housing development is sited opposite the designated</p>

<p>Do you support, object or wish to comment on the approach to Review and Five-Year Land Supply? Plan review and five-year housing land supply</p> <p>This plan will be reviewed 5 years after adoption. Five-year housing land supply will be calculated across the whole of the three districts. The plan provides enough allocations to provide a five-year housing land supply on adoption</p> <p>Do you support, object or wish to comment on the approach to Infrastructure?</p>	<p>employment area, only the “positive” of the potential for providing local employment (within walking distance) to residents of the new development has been highlighted. Siting a housing development so close to a “employment area” which is already home to heavy industry can have many negative impacts on residents, with regard to road safety, increased traffic in a confined area, noise and pollution. It should also be recognised that employment does not occur in just one designated area within a community.</p> <p>There appears to be no time scales with regard to the development of the employment area - i.e when would the jobs be delivered?</p> <p>Whilst Hingham Town Council support the policy “the sustainable growth strategy will be supported by improvements to the transport system, green infrastructure and services” – there is absolutely no evidence to show how this will be achieved in Hingham. Hingham is in need of improvements to its footways, roads, school, green infrastructure and public transport – HOW in this going to be improved in Hingham to support the growth of the town?</p>
<p>POLICY 2 – SUSTAINABLE COMMUNITIES</p> <p>Do you support, object or have any comments relating to the preferred approach to sustainable communities including the requirement for a sustainability statement?</p> <p>Do you support, object or have any comments relating to the specific requirements of the policy.</p>	<p>Hingham Town Council supports the policy with regard to Sustainable Communities, but again question it’s deliverability, with specific reference to Hingham. It is disappointing that the GNLP housing development site assessment has concluded that a Preferred option – GNLP0520 is contrary to this policy on several counts. The development would not be able to provide safe and convenient access to existing facilities in the town (ref policy 2.1) , it would not respect, protect and enhance the landscape character (ref policy 2.5) and would unlikely to be able to manage travel (ref policy 2.6) demand due to Hingham’s limited public transport. The preferred</p>

<p>Consultation responses are welcomed on the likely cost of implementing the proposed energy policy approach locally.</p>	<p>option site GNLP0520 certainly would not “minimise flood risk or reduce the cause and impacts of flooding” (ref policy 2.8). Whilst the policy theory for Sustainable Communities on paper is very desirable, HOW is this going to be achieved when preferred sites for housing development are allocated that are contrary to this policy. The GNLP team and Planning Authorities thereafter should actively seek information from residents affected by or potentially affected by flooding in the vicinity of a proposed site allocation or development, rather than accepting the submittance from the developers that flooding has been / can be mitigated.</p> <p>With reference to policy point 2 i (page 62) “using a recognised community engagement process will be encouraged on larger sites.....200 dwellings” this is not far reaching enough. Community engagement should be mandatory for any development that would have a significant impact on a community – for example – with specific reference to Hingham – a development of 80 houses would have a significant impact on the town, in terms of integrating into the community, burden on local facilities such as Drs surgery and school and associated parking issues, as well as the visual and character impact a development would have on a small historic town such as Hingham.</p> <p>As the Council have declared a climate emergency we believe that any new housing should be as energy efficient as possible and this is beyond the present building regs it should still be required. The use of community battery schemes would be useful in taking excess power generated during the day and making it available at night. If we are going to be required to drive electric cars then there will be a need for a much enhanced grid and the large power stations could be supplemented by local generation. On a historic note Hingham did at one time have it’s own gas works and similar small scale electrical generation should be welcomed</p>
<p>POLICY 3 – ENVIRONMENTAL PROTECTION AND ENHANCEMENT</p> <p>Do you support, object or have any comments relating to approach to the built and historic environment?</p>	<p>Hingham Town Council support the policy of environmental protection and enhancement. A community should have total confidence that if forced to accept more development , that the development would be an asset to and enhance the environment.</p> <p>Preferred option site for housing development GNLP0520 is contrary to this policy. It has been commented upon that the recent Hops development adjacent to GNLP0520 (built by the same developer) has “ruined” the approach to Hingham and is an “eyesore”. Communities should not be subject to development that instils such vehement dislike and opposition.</p>

Do you support, object or have any comments relating to the approach to the natural environment?

Are there any topics which have not been covered that you believe should have been?

Policy 3 states “ The development strategy of the plan and the sites proposed for development reflect the area's settlement structure of the city, towns and villages, retaining the separate identities of individual settlements.

Development proposals will be required to conserve and enhance the built and historic environment through:

being designed to create a distinct sense of place and enhance local character taking account of local design guidance and providing measures such as heritage interpretation to further the understanding of local heritage issues;”

With the allocation of GNLPO520 as a preferred site to be built by the same developer as the Hops, residents fear being left with a large area of development (covering both the Hops and GNLPO520) that will not be in keeping with the historic environment of the very nearby areas of Hingham. Having one development of a distinctive style already been built, it does not mean that it is right for the settlement to be further developed by adding more of the same. In particular if its style and design is likely to be opposed and resented by residents of the town.

With regard to the Natural Environment –“ Development proposals will be required to conserve and enhance the natural environment. Key elements of the natural environment include valued landscapes”. Again with specific reference to GNLPO520. Development of GNLPO520 would be contrary to Policy 3 “The Natural Environment Development proposals will be required to conserve and enhance the natural environment. Key elements of the natural environment include valued landscapes” ... it is clear from residents objections that the loss of such prominent and valued open landscape by developing GNLPO520 would definitely not “conserve or enhance the natural environment”, but permanently destroy it, on the approach to Hingham via the Norwich Road.

Sites should not be allocated for development when they are so clearly contrary to the policies that should be applied.

Whilst the Council believes that there should be no development until the present allocations have been built on it does believe that planners should give careful consideration to allowing more self build across the district and that they should be willing to allow some experimental green initiative building that takes account the need to address climate change/the climate emergency.

In the context of the climate emergency, where several species of wildlife native to Britain are becoming extinct or at risk of extinction the Council are concerned to ensure that housing developments are not built on areas where rare species of wildlife may exist, or indeed, where extension of the urban area will contribute to

	<p>the depletion of wildlife. Should housing development take place wildlife habitat should be preserved, protected, enhanced and improved.</p>
<p>POLICY 4 - STRATEGIC INFRASTRUCTURE</p> <p>Do you support, object or have any comments relating to approach to transport?</p>	<p>There is insufficient detail as to HOW transport provision will be improved for the outer reaches of the GNLP area. The focus is too heavily on Norwich and Major road networks (A roads). There is no commitment to improvement within Hingham which is situated on the B1108 which is subject to ever increasing traffic numbers and carries traffic from the large areas of development in and around Watton/Carbrooke (Breckland).</p> <p>The policy document notes that Hingham has "good transport links". This is not an accurate description. The Joint Core Strategy 6.53 describes Hingham as having a "limited bus service", since the JCS was adopted there has been a reduction in bus services and threats of loss of the already severely limited direct bus service to Dereham .</p> <p>In the context of the climate emergency where we need to encourage everyone to be less reliant on cars and to use public transport as much as possible, this strategy document, taking us up to 2038, is very much lacking in ambition and concrete provisions of improvement to transport links. Currently buses are available to Wymondham, Watton and Norwich every 30 minutes and buses to the Norfolk and Norwich Hospital and Research Park once an hour, also buses stop at around 7pm.</p> <p>In terms of employment the document states Hingham is "well located to benefit from additional employment opportunities in the Cambridge Norwich Tech Corridor" - this does not seem an accurate description in the context of reliance on public transport when there is one bus an hour to the Research Park and a bus to the Hethel Innovation Centre (a 20 minute drive) would take 2 hours via Norwich. In addition, no consideration has been made to account for the fact that Hingham is on the very edge of South Norfolk bordering with Breckland and that people could quite conceivably want to travel to Attleborough or Dereham for work, local amenities or leisure and there are either limited or no public transport links directly available to these places at all (a bus to Attleborough would take over an hour verses a 10 minute drive by car, and to Dereham a 40 minute bus ride is only available twice a week, otherwise an hour and a half bus journey versus a 20 minute drive).</p> <p>In terms of leisure a night bus service, enabling people to return from the city after going to the theatre or seeing a band would also be very welcome. For a strategy that claims to aspire towards a "radical shift away from the private car" current plans seem woefully inadequate.</p>

Do you support, object or have any comments relating to the approach to other strategic infrastructure (energy, water, health care, schools and green infrastructure)?

Do you support, object or have any comments relating to the approach to on-site and local infrastructure, services and facilities?

“Development proposals will provide on-site services and facilities and support local infrastructure capacity improvements through on-site provision, providing land and developer contributions”.

There is no mention in Policy 4 of road infrastructure improvements to support additional traffic through the rural communities forced to accept more housing development, and no commitment to ensuring that infrastructure will be enhanced to try to ensure greater adherence to speed limits.

There are long held concerns over the safety of the B1108 Fairland crossroads – More housing development in Hingham and the surrounding areas will only increase the vehicle numbers using this already dangerous crossroad. Hingham Town Council have applied for (and have been successful) NCC Parish Partnership bid for a feasibility study into the Fairland/B1108 junction safety improvements. In order to support further development of Hingham, if it is proved to be feasible to improve this junction, a firm commitment needs to be made from the Highways authority to undertake the work.

Policy 4 states “School capacity will be increased to provide for growth by improvements to existing schools”

With specific reference to Hingham – there is widespread concern within the community of the pressure that more housing will have on the primary school and Drs surgery. Current plans for Hingham Primary School are to replace old worn out mobile classrooms with new structures, however this will not increase the capacity of the school. With development taking place in Watton, Carbrooke and Great Ellingham, parents from Breckland are looking to enrol children in Hingham Primary School, increasing the pressure on the school’s ability to accommodate additional numbers of children (the Drs Surgery also has a wide catchment area within Breckland). There is also concern regarding the lack of sufficient local child care places to assist working parents.

It should also be noted that Hingham does not have a high school.

With regard to green infrastructure. Being that there is no public car park and businesses in the Market Place and Fairland have no dedicated parking for staff or customers, it would be unlikely to achieve provision for green travel (outside of that of providing private charging points within a development) such as provision of publicly available vehicle charging points.

Developers should also be looking to contribute to improving and sustaining infrastructure beyond the boundary of the development to help to ease the burden on existing infrastructure and facilities

Are there any topics which have not been covered that you believe should have been?

Pedestrian Priority within communities – Policy 4 has no mention of providing improvement to the pedestrian network for communities, outside of Norwich. With particular reference to Hingham, nowhere in the town is there a crossing point giving pedestrian priority over the busy B1108 (or any other road within the town).

Public Parking facilities – it is unrealistic to conceive that in a rural area with a limited bus service, businesses within the “Key Service Centre” can flourish without the provision of adequate public parking. It is essential that businesses can encourage and obtain support from visitors to the town from nearby villages. If the small independent businesses within the Hingham cannot flourish, they will close and residents of Hingham will also have to travel further afield to shop. Adequate public parking must be addressed, not only for visitors to the town but those residents that need to access local services and businesses using a car due to ill health or mobility issues.

Town like Hingham to construction of large housing estates on the outskirts of town tend to mean that the people live on those estates to become a separate community. We would suggest therefore that developers provide finance to further develop existing facilities or provide new facilities for the whole community like a car park

Parking facilities for existing community buildings – within Hingham these are insufficient to support growth and to enable these facilities to thrive. The Lincoln Hall/Bowls Club/Library and the Sports Centre parking areas are inadequate in size to accommodate visitors to these venues during busy times, and it is of concern that the venues will lose bookings and revenue if they cannot provide adequate parking facilities for their potential customers.

POLICY 5 – HOMES

Do you support, object or have any comments relating to approach to affordable homes?

Hingham Town Council support the policy that “Residential proposals should address the need for homes for all sectors of the community having regard to the latest housing evidence, including a variety of homes in terms of tenure and cost. New homes should provide for a good quality of life in mixed and inclusive communities and major development proposals should provide adaptable homes to meet varied and changing needs”

The Council would like to raise the a concern regarding the location of social houses within developments. These homes are often for families and are placed on less desirable plots within a development, with rear gardens adjacent to the main road, this will mean that children residing there will being exposed to increased levels of pollution and noise whilst playing in their gardens.

Do you support, object or have any comments relating to the approach to space standards?

<p>Do you support, object or have any comments relating to the approach to accessible and specialist Housing?</p> <p>Do you support, object or have any comments relating to the approach to Gypsies and Travellers, Travelling Show People and Residential Caravans? To help to meet long term need, this consultation specifically invites additional sites for Gypsy and Traveller accommodation, either on new sites or as extensions to existing sites.</p> <p>Do you support, object or have any comments relating to the approach to Purpose-built student accommodation?</p> <p>Do you support, object or have any comments relating to the approach to Self/Custom-Build?</p> <p>Are there any topics which have not been covered that you believe should have been?</p>	<p>Having a policy specifically relating to specialist housing in particular to that of older peoples accommodation does not take into account or directly address the needs of older people generally, who reside within general accommodation within developments, for instances people that may wish to downsize from a house to a bungalow, it does not take into account that these people will grow older while in their home and may have greater needs as they age. Therefore ALL development should address the need for residents to have good access to services within the community, and infrastructure within the community be improved sufficiently to be able to provide this, for example adequate footways and pedestrian priority crossing points.</p> <p>Whilst the Council believes that there should be no development until the present allocations have been built on it does believe that planners should give careful consideration to allowing more self build across the district and that they should be willing to allow some experimental green initiative building that takes account the need to address climate change/the climate emergency.</p> <p>Provision of accommodation for the homeless via a relevant charity .</p>
<p>POLICY 6 - THE ECONOMY</p> <p>Do you support, object or have any comments relating to the approach to employment land?</p>	<p>The allocation of employment locations should be considered in relation to allocation of preferred sites for housing development – and should be considered how the 2 areas would impact on each other both positively and negatively. In Hingham a preferred site for housing development is sited opposite the designated employment area, only the “positive” of the potential for providing local employment (within walking distance) to residents of the new development has been highlighted. Siting a housing development so close to a “employment area” which is already home to heavy industry can have many negative impacts on residents, with regard to road safety, increased traffic in a confined area, noise and</p>

Do you support, object or have any comments relating to the approach to tourism, leisure, environmental and cultural industries?

Do you support, object or have any comments relating to the sequential approach to development of new retailing, leisure, offices and other main town centre uses?

Are there any topics which have not been covered that you believe should have been?

pollution. It should also be recognised that employment does not occur in just one designated area within a community.

There appears to be no time scales with regard to the development of the employment area - i.e when would the jobs be delivered?

Under Section 3 Vision and Objectives - Economy - 116 - references are made to "improved broadband and mobile phone infrastructure" to enable "the growth of small scale businesses, more working from home and remote working". It is important to note that such improvements to infrastructure have long been promised and are yet to materialise – when will these promises be implemented? Existing businesses in Hingham, such as the pub and the solicitors already have problems for example taking payments with card machines.

It is unrealistic to conceive that in a rural area with a limited bus service, businesses within the "Key Service Centre" can flourish without the provision of adequate public parking. It is essential that businesses can encourage and obtain support from visitors to the town from nearby villages. If the small independent businesses within the Hingham cannot flourish, they will close and residents of Hingham will also have to travel further afield to shop.

Adequate public parking must be addressed, not only for visitors to the town but those residents that need to access local services and businesses using a car due to ill health or mobility issues.

Parking facilities for existing community buildings – within Hingham these are insufficient to support growth and to enable these facilities to thrive. The Lincoln Hall/Bowls Club/Library and the Sports Centre parking areas are inadequate in size to accommodate visitors to these venues during busy times, and it is of concern that the venues will lose bookings and revenue if they cannot provide adequate parking facilities for their potential customers.

With reference to "new retailing" - it is concerning that there is no focus on encouraging, preserving and enhancing retail within the existing high street environment, addressing empty retail premises and assisting existing businesses to flourish.

Use/regeneration of existing empty retail premises within high street/communities

<p>POLICY 7.1 – The Norwich Urban Area including the fringe parishes</p> <p>Do you support or object or wish to comment on the approach for the city centre? Please identify particular issues.</p> <p>Do you support or object or wish to comment on the approach for East Norwich? Please identify particular issues.</p> <p>Do you support or object or wish to comment on the approach for elsewhere in the urban area including the fringe parishes? Please identify particular issues.</p> <p>POLICY 7.2 – THE MAIN TOWNS</p> <p>Do you support or object or wish to comment on the approach for the main towns overall? Please identify particular issues.</p> <p>Do you support or object or wish to comment on the approach for specific towns (Aylsham, Diss (with part of Roydon), Harleston, Long Stratton and Wymondham)? Please identify particular issues.</p>	
<p>POLICY 7.3 – THE KEY SERVICE CENTRES</p> <p>Do you support or object or wish to comment on the approach for the key service centres overall? Please identify particular issues.</p> <p>Do you support or object or wish to comment on the approach for specific key service centres: (Acle, Blofield, Brundall, Hethersett, Hingham, Loddon / Chedgrave, Poringland / Framingham Earl, Reepham, Wroxham)? Please identify particular issues.</p>	<p>Hingham has been designated as a Key Service Centres, at no point in the document is there a definition for a “Key Service Centre”. The lack of concrete criteria for a “Key Service Centre” renders the designation of such an entity meaningless.</p> <p>Hingham was not deemed important enough by South Norfolk Council for them to continue to provide such a basic facility as public toilets. The public toilets were under threat of closure by South Norfolk Council, and would have been permanently closed had the Town Council not take over the ownership of them.</p> <p>Hingham has several services/facilities that are inadequate to support growth within the town. The Library is not housed within a purpose built facility however, it provides a range of valuable roles to the local community, as well as access to education for children and adults through books and use of the internet, the library supports health and wellbeing with books on prescription and is a valuable community resource for social get togethers such as knit and natter, coffee mornings, sessions for parents and babies and IT support.</p> <p>The historic nature of Hingham means that is has substandard and narrow footways in places. There is no pedestrian priority crossing places. There is no public car park and no high school. There is no commitment to increase the capacity at the primary</p>

school and Drs surgery, and increased capacity would come with the additional problems with lack of parking.

It is unrealistic to conceive that in a rural area with a limited bus service, businesses within the “Key Service Centre” can flourish without the provision of adequate public parking. It is essential that businesses can encourage and obtain support from visitors to the town from nearby villages. If the small independent businesses within the Hingham cannot flourish they will close and residents of Hingham will also have to travel further afield to shop. Adequate public parking must be addressed, not only for visitors to the town but those residents that need to access local services and businesses using a car due to ill health or mobility issues.

Parking facilities for existing community buildings – within Hingham these are insufficient to support growth and to enable these facilities to thrive. The Lincoln Hall/Bowls Club/Library and the Sports Centre parking areas are inadequate in size to accommodate visitors to these venues during busy times, and it is of concern that the venues will lose bookings and revenue if they cannot provide adequate parking facilities for their potential customers.

The policy document notes that Hingham has “good transport links”. This is not an accurate description. The Joint Core Strategy 6.53 describes Hingham as having a “limited bus service”, since the JCS was adopted there has been a reduction in bus services and threats of loss of the already severely limited direct bus service to Dereham .

In terms of employment the policy document states Hingham is “well located to benefit from additional employment opportunities in the Cambridge Norwich Tech Corridor” - this does not seem an accurate description in the context of reliance on public transport when there is one bus an hour to the Research Park and a bus to the Hethel Innovation Centre (which is a 20 minute drive) would take 2 hours via Norwich.

This description is akin to calling Hingham a “commuter town” which is not indicative to the ethos of “Growing Stronger Communities Together”

There is no evidence in the policy of commitment to provide improved infrastructure in Hingham to enable the town to sustain the quoted 120 new homes, in particular additional primary school places and improvements to the road and footway network in the town.

	<p>With no commitment to improving infrastructure within the town, there seems to be no benefit to the residents of Hingham (the Community), of being deemed a “Key Service Centre”, just the burden of additional housing development.</p>
<p>POLICY 7.4 – VILLAGE CLUSTERS</p> <p>Do you support or object or wish to comment on the overall approach for the village clusters? Please identify particular issues.</p> <p>Do you support or object or wish to comment on the approach for specific village clusters?</p> <p>Please identify particular issues. Please submit any additional sites in village clusters in either Broadland or South Norfolk which you feel are suitable for allocation. We are particularly looking for sites of less than 1 hectare which could provide a minimum of 12 homes</p>	
<p>POLICY 7.5 – SMALL SCALE WINDFALL HOUSING DEVELOPMENT</p> <p>Development of up to a maximum total of 3 dwellings within each parish during the lifetime of the plan will, in principle, be permitted on sites adjacent to a development boundary or on infill sites within a recognisable group of dwellings. Self/custom build will be supported. Proposals will respect the form and character of the settlement and have no detrimental impact on the landscape and natural environment.</p> <p>Do you support or object or wish to comment on the overall approach for Small Scale Windfall Housing Development? Please identify particular issues.</p>	<p>Hingham Town Council do not support the policy, it is not clearly written and the policy is ambiguous and needs to be clarified (or removed entirely).</p> <p>Does the policy mean there will only be one site of a total of 3 dwellings permitted in each parish OR does it mean there will be an unspecified number of separate sites in each parish but only allowing 3 dwellings on each site.</p> <p>If this policy is intended to only permit 3 windfall properties maximum within each parish, it is unlikely to be able to stand up on appeal. If two people in one village submitted equally suitable plans for 3 houses on 2 separate sites, at about the same time, say as soon as the plan is adopted, there would be a danger that an appeal would result in the village having an extra 6 houses.</p> <p>The policy could add a considerable number of houses throughout the district and would add additional burdens on the communities and infrastructure/facilities, have additional negative impact on climate change and place more residents in areas where there is a lack of public transports etc.</p> <p>It is concerning that this policy will mean applications for development will seemingly be approved even if there is local opposition, objections from neighbouring residents and such developments may be built outside of a development boundary or infill into small valuable areas of open countryside.</p>