

Appendix C1 - Highways Report



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Our Ref: 033/2020/01R - Please quote in all correspondence.

02 March 2021

Dear Henry,

Greater Norwich Local Plan Allocations: Hingham – Highways Comments

I refer to your request for highway advice concerning the local plan allocated sites for residential use at Hingham. Two sites are currently promoted:

GNLP0503 off Dereham Road, refer **Appendix A**; and
GNLP0520 off Norwich Road, refer **Appendix B**.

Another site, currently classed as *Unreasonable Residential Site*:

GNLP0298 and GNLP0335 off Watton Road, refer **Appendix C**.

I have undertaken a desk top review, visited the sites and can offer the following observations.

Site GNLP0503 off Dereham Road

Development of up to 20 dwellings, subject to:

- provision of a safe access;
- a continuous footway at the west side of Dereham Road from the site access to Pottles Alley; and
- promotion of a Traffic Regulation Order to extend the existing 30mph speed limit along the site frontage.

Access

Photographs 1 and 2 identify the location of the site as identified in the policy, extract below Figure 1. The available roadside frontage, identified by the red arrow, is only approximately 5m wide.

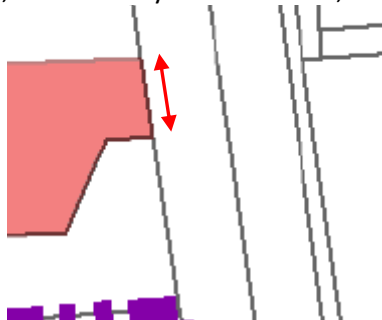


Figure 1: Allocation roadside frontage limited to approx. 5m

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Photographs 1 and 2: Site GNL0503 access location

The roadside frontage illustrated in the allocation policy plan, of approximately 5m, is inadequate to provide for the required 5.5m road, 6m radii kerbs and 2m footways to safely access a proposed development of 20 units.

As currently shown, the roadside frontage available may be sufficient to serve a development of up to 5 units, assuming there is sufficient width to achieve a private drive and sufficient width to allow two vehicles to safely pass in the driveway, whilst also providing a shared facility for pedestrian access.

The 30mph speed limit terminal is located at the proposed access location. Visibility splays of 2.4 x 215m are required in the derestricted (60mph) approach. Unless the 30mph speed limit is extended, it is unlikely that the required 60mph visibility splay dimensions can be achieved within highway.

To provide an access in this location will require a Traffic Regulation Order (TRO) amendment to relocate the 30mph speed limit terminal signs. The process to amend a TRO involves a consultation and a fee payable to the highway authority in the order of £10,000. The successful outcome of TRO process cannot therefore be guaranteed.

Provision of safe access cannot therefore be proven, given inadequate roadside frontage to form an access of acceptable width.

Also, the required TRO process outcome cannot be guaranteed.

Pedestrian footway

Manual for Streets suggests that: 'the minimum unobstructed width for pedestrians should generally be 2 m.' Figure 6.8 of Manual for Streets shows the effective width taken up by various types of pedestrians – these include, 0.75 m for a person with a walking aid, 0.9 m for a wheelchair, 1.5 m for two people walking side by side and 1.2 m for an adult holding a child's hand.

In Inclusive Mobility guidance (DfT, December 2015) at section 2.2, paragraph 1, there are details of different widths required for mobility impaired and visually impaired people as follows:

- A person using two sticks, crutches or walking frame need a minimum of 900 mm
- A blind person using a long cane or with an assistance dog needs 1100 mm
- A visually impaired person who is being guided needs a width of 1200 mm
- A wheelchair user and an ambulant person side by side need 1500 mm

Cont'd...

Inclusive Mobility guidance states that a clear width of 2 m allows two wheelchairs to pass comfortably and should be regarded as “the minimum under normal circumstances.” It goes on to say that 1.5 m should be regarded as the minimum acceptable giving sufficient space for a wheelchair and walker to pass.

The absolute minimum where there is an obstacle should be 1m clear space. In Section 3.11, it is highlighted that there are sometimes temporary obstacles that can problems for disabled people, amongst these are dustbins which are present on Swan Street. The guidance states that “wherever feasible obstructions of this kind should be kept to a minimum and should not encroach on the clear space (horizontal and vertical) needed to provide safe passage for pedestrians.”

The towns footpaths have therefore been assessed against their ability to accommodate **1.5 m** minimum footway width.

The verge on the west side of Dereham Road in the vicinity of the site access is 3.1m wide. Thus, here it is suitable to accommodate a 1.5m footway. However, progressing south towards the town the available highway verge begins to narrow. Photograph 4, taken by No 24, identifies highway boundary of only approx. 1.3m, insufficient to deliver a 1.5m footway.



Photograph 3: West side Dereham Road available verge



Photograph 4: Only 1.3m highway verge in front of No 24

Cont'd...

A 1.5m existing footway commences on the west side from the boundary No 22/24 and follows the visibility splay of Greenacre Road, Photograph 5.



Photograph 5: Existing 1.5m footway Greenacre Road

The west side footway ends at the boundary of No 18 where there is a highway pinch point with no available verge width. Refer Figure 2 extract, **Appendix D** and Photographs 6 and 7.

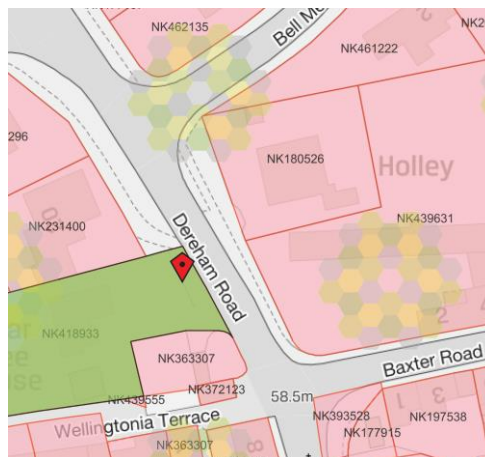


Figure 2: Highway pinch point No 18 (Source: OS)



Photographs 6 and 7: Highway pinch point frontage No 18

Cont'd...

Across the pinch point frontage of No 18 the road width is 5.8m and footway width is 1.4m, on the east side. There is no highway space for the policy required footway provision on the west side.

There is also no highway space available in the immediate vicinity to implement a pedestrian refuge to cross the pedestrians safely to the east side footway.

The only option for continuous pedestrian footway on west side, as required by the policy, would be to narrow the road to single way priority working. This may require TRO unless Norfolk County Council, as highway authority, agree such a scheme may be 'self-enforcing'.



Photograph 8: Location for possible single lane working priority scheme to enable footway

There is an existing footway on the remaining length of west side Dereham Road up to Pottles Alley, but this has sections that are below the 1.5m width threshold.



Photograph 9: Localised pinch point 1.25m on southern section of Dereham Road west side footway

Refer to **Appendix E** for a summary of the issues relating to pedestrian routes to town centre for site GNLP0503.

There is insufficient highway verge to enable a continuous footway to be delivered at the west side of Dereham Road from the site access to Pottles Alley. Either significant road narrowing will be required, or a suitable location found for a pedestrian refuge to allow pedestrians to cross instead to the east side. Pedestrian safety may be compromised.

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Site GNLP0520 off Norwich Road

The allocation is subject to:

- provision of adequate visibility splays;
- Footways, to be provided along the whole site frontage;
- Provision of a pedestrian crossing refuge in the vicinity of Ironside Way;
- TPO oak trees on south side of Norwich Road to be retained; and
- active frontage along Norwich Road and show regard to the site's gateway role.

Access

Refer **Appendix F**: Site GNLP0520 Norwich Road access options drawing.

Option 1 access location opposite No 47, by the street lighting column, is viewed in Photographs 10 and 11.



Photographs 10 and 11: Site GNLP0520 access location Option 1

The measured 85th percentile speeds on Norwich Road exceed the 30mph limit and are in the region of 37mph. (Source: Speed watch team data). Thus, visibility splays of 2.4 x 90m will be required in each direction. Refer **Appendix G**, this would appear achievable.



Photographs 12 and 13: Visibility access location Option 1

Cont'd...

Option 2 access location, in between and opposite AC Bacon Eng and Ironside Way junction can be seen in Photographs 14 and 15.



Photographs 14 and 15: Site GNLP0520 access location Option 2



Photograph 16: Visibility impacted by hedgerow

Again, visibility splays of 2.4 x 90m will be required in each direction in order to achieve safe access. Refer **Appendix G**, this would appear achievable, however would require significant hedgerow removal (which may be protected) and possible impact on TPO 'T5'.

The location of proposed Option 2 access is also in close proximity to the Ironside Way junction, which has busy heavy commercial vehicle movements. The junction stagger distance does not meet required Design Manual for Road and Bridges (DMRB) standards.

Safe access cannot be achieved at Option 2 location, due to proximity to Ironside Way junction and issues achieving required visibility.

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Pedestrian footway

The policy requires the provision of footways, to be provided along the whole site frontage and to protect the visibility splays.

The Phase 1 site, known as the Hops, did not achieve roadside footway to Norwich Road. Refer to Photographs 17 and 18, demonstrating Norwich Road with no frontage footway.



Photographs 17 and 18: Lack of highway to form roadside footway

The delivered pedestrian route for Phase 1 commences at the boundary between Phase 1 and Phase 2, Site GNLP0520 land, refer Photograph 19. The internal pedestrian route continues in a southern direction, away from Norwich Road, Photograph 20.



Photographs 19 and 20: Alternative internal pedestrian route, through Phase 1

The internal pedestrian route continues through the Phase 1 development, along the shared surface road known as Granary Way, which has no separate footway provision or land available to deliver a safe segregated pedestrian route. The pedestrian route through Phase 1, relies upon a stretch of shared surface, with pedestrians mixing with vehicles and hence does not provide a safe continuous footpath via The Hops, Photographs 21 and 22.

Cont'd...



Photographs 21 and 22: Internal pedestrian route, through Phase 1 on shared surface roads

The route then re-joins Norwich Road at the Phase 1 site junction, where pedestrians are then required to cross over, using the provided pedestrian refuge, to reach ongoing pedestrian routes to the town centre, Photograph 23.

There was an inability to provide a continuous pedestrian footway along Norwich Road, Photograph 24 and thus the pedestrian refuge crossing was required to provide safe pedestrian facility. It is noted pedestrians will be likely to make multiple further crossings of the Norwich Road due to footpath restrictions to reach the Town Centre.



Photographs 23 and 24: Pedestrian Refuge Norwich Road to avoid highway pinch point

During the regulation 18C consultation concerns were raised by Hingham Town Council regarding the poor pedestrian access to the Town facilities from the south side of Norwich Rd. This affecting the existing development “The Hops” and also the further proposed development Site GNLP0520 would be subject to the same issues. There is no evidence to suggest that their representations were given due consideration.

The **Appendix F:** Site GNLP0520 Norwich Road access options drawing includes indicative Phase 2 footway links. They are not proposed to be provided along the whole site frontage, or to protect the visibility splays, as required by policy. They however have been shown set back from Norwich Road and linking to the bus stop, Photograph 19.

Refer to **Appendix H** for a summary of the issues relating to pedestrian routes to town centre for site GNLP0520.

Cont’d...

Not proposing a footway along whole site frontage, or to protect visibility splays.

Only an internal pedestrian route (walking within a shared road surface in Phase 1 The Hops) **and need to make use of pedestrian refuge for onward town centre routes.**

The policy requires provision of a pedestrian crossing refuge in the vicinity of Ironside Way, to access local employment opportunities.



Photograph 25: Access option 2 location and location for pedestrian refuge

Given the absence of currently proposed site frontage footway along Norwich Road, the provision of a pedestrian refuge in this location, to serve the local employment area from the development, will need to be reviewed.

There is no currently proposed footway from Site GNLP0520 east, towards the employment area.

In light of the currently proposed internal pedestrian links, the most appropriate location for a pedestrian refuge for access towards the local employment may actually be in the vicinity of the bus stop (west of the site frontage), where the pedestrian link joins Norwich Road. The road will be required to be widened to approx. 8m to accommodate a pedestrian refuge here. It may not be possible to achieve the required widening to enable a pedestrian refuge here, with the restrictions from TPO trees in the verge and proximity of the bus stops.

Hingham Town Council has also made previous representation on this policy requirement pedestrian refuge issue, given there is no evidence to support that the policy relating to the pedestrian refuge in the proximity of Ironside Way, to access local employment opportunities, is feasible or achievable. Furthermore, the Town Council considers that the location of the pedestrian island (as indicated in the submission by Bidwells on behalf of Abels Homes¹¹) is dangerous, being that from the south side of Norwich Road it will place pedestrians behind a blind bend and will put pedestrians between the two access points to Ironside Way industrial area on the north side of Norwich Road. These access points to the “employment area” are already subject to frequent vehicle movements especially from extremely large HGV’s, the existing Ironside Way will be the access point for the land allocated for further employment development (HIN2 in the GNLP) which will (when developed) increase traffic movements to an as yet unknown quantity and size.

There is no currently proposed footway from Site GNLP0520 east, towards the employment area.

Pedestrian refuge location, to serve local employment area, will need to be reviewed in light of absence of roadside pedestrian footway provision eastwards and other local highway constraints.

Cont’d...

Other Highway Mitigation

The policy requires the TPO oak trees on south side of Norwich Road to be retained. Referring to **Appendix F: Site GNLP0520 Norwich Road access options drawing** and **Photograph 26**, it can be seen that tree T3 canopy has been cut and tree T4 is now removed and is a stump.



Photograph 26: Only 3 TPO oak trees remaining

TPO oak trees on south side of Norwich Road have not been retained.
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Site GNLP0298 and GNLP0335 off Watton Road



Photographs 27 and 28: Site GNLP0298 and GNLP0335 access location

This site is currently classed as *Unreasonable Residential Site*. This is despite submission of document 033/2020/P1 Highway Statement, prepared and submitted in support of the allocation, **Appendix I**.

At stage 18C of the GNLP process, the stated reason for site rejection was noted simply as '*The Highway Authority maintain that it does not appear to be feasible to provide an acceptable footway between the site and local facilities*'. On seeking clarification from NCC highways as to when and who submitted that comment into the process, the reason (set out in full in **Appendix L**) was provided by the principal planning policy officer, reason for ongoing rejection being:

Cont'd...

'The Highway Authority maintain that it does not appear to be feasible to provide an acceptable footway between the site and local facilities'. The principle concern is that the highway verge to the east of the site appears to be limited in width and is raised above the carriageway. It is not clear that an acceptable 2.0m wide footway can be provided within the highway at the south side of the B1108 to connect the site with local facilities. In addition if the verges need to be reduced in height to provide the required footway and visibility splays the viability of adjacent hedges could also be affected. Due to these constraints it was not considered that the site could reasonably be allocated 'subject to footway provision' as other sites in the plan are.

Despite this assumption, it has been proven that a safe pedestrian connection to existing pedestrian routes can be achieved by the provision of a central pedestrian refuge (as is the requirement also with the Norwich Road site 0520). Refer to **Appendix J**, Drg 033/2020/02P1, Site GNLP0298 and GNLP0335 Proposed highway mitigation, demonstrating this safe provision can be achieved.

Access

Based on a topographical survey and the highways ownership, safe access can be achieved and with visibility splays to meet measured speeds. It is also noted that previous application on the site did not receive a highways objection (Ref: 2019/0827) although it is noted this was for a minor scheme.

Pedestrian footway

Development can link to existing continuous footway north side of Watton Road, using the pedestrian refuge proposed (Appendix J). Road widening will be required and can be accommodated. There should be no ongoing requirement to provide a footway on the southern side, given this does not link to a continuous route in any event.

Refer **Appendix K** for the safe pedestrian routes to town centre and school from site GNLP0298 and GNLP0335.

Highway Mitigation

Can be fully delivered to achieve safe access and pedestrian links to the town centre. **Appendix J:** Drg 033/2020/02P1, Site GNLP0298 and GNLP0335 Proposed highway mitigation.

Summary

NPPF Paragraph 109 *Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*

It would appear that the only 'deciding factor' in the rejection of **Site GNLP 0298 and GNLP 0335** as a draft allocation (**Appendix K**) was based on incorrect assumption regarding ability to achieve a safe pedestrian route. The allocations may thus currently be based on incomplete or flawed data and reach an incorrect technical conclusion. As such the conclusions reached in the GNLP allocations are unsound and should be reviewed in light of this.

In light of the highways review of allocations in Hingham, it would appear (summarised in Table 1) that sites **GNLP 0298 / GNLP 0335** are more readily deliverable than **Site GNLP0520** Norwich Road and **Site GNLP0503** Dereham Road, which cannot meet the stated policy requirements.

The site allocations for Hingham in the Greater Norwich Local Plan should be reviewed in light of this.

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		Satisfactory	Needs some Upgrade	Not Satisfactory
Highway Safety Considerations:	Site GNLP0503 20 units			
Site access	Dereham Road:			
Visibility splays	Achievable- but only assuming TRO amendment successful relating to speed limit.			
Speed limit	30mph TRO amendment required. TRO successful outcome cannot be guaranteed.			
Available width	Insufficient land width to provide satisfactory access, need ~ 11.5m width roadside frontage. Red line frontage cannot accommodate internal road width or footways. Limited frontage ~5 m. Insufficient access to allow safe vehicle passage and separate pedestrian facility.			
Pedestrian links	New continuous Footway provision required west side/ crossing, highway land not available. Policy cannot be achieved.			
Highway Safety Considerations:	Site GNLP0520 80 units			
Site access	Norwich Road:			
Visibility splays	East access (option 2) achieving required splays impacted by hedgerow			
Option 2 access location	Access conflict with Ind Est turning at Ironside Way. Local study suggested roundabout required for speed reduction.			
Pedestrian links	Continuous Footway provision required across whole site frontage- not achieved and no connection east			
Continuous route	Requires use of a pedestrian refuge crossing to enable a continuous route, past highway pinch point.			
Ironside Way pedestrian refuge	Policy cannot be complied with. Alternative location for pedestrian links to employment area required.			
TPO oak trees on frontage	This has not been complied with. Trees have been removed.			
Highway Safety Considerations:	Site GNLP 0298 and GNLP 0335			
Site access	Watton Road:			
Visibility splays	Meets requirement for measured 85%ile speed			
Available width	A satisfactory access with necessary visibility can be achieved. 5.5m road, footways and radii achievable			
Pedestrian links	New continuous Footway provision enabled via new pedestrian refuge			
Pedestrian Crossing refuge	To cross to north side, deliverable			

Table 1: Highway Safety deliverability compared between Hingham sites

Cont'd...

I trust this letter addresses your brief, and I have no objection to you using this document as part of any submission in relation to the above site. However, if you have any queries or wish to discuss further, please do not hesitate to contact me.

Kind regards

Yours sincerely



Carol Grimsey CEng CIHT
For and on behalf of G H Bullard & Associates LLP

Enc.

Appendix A: Site GNLP0503 Dereham Road

Appendix B: Site GNLP0520 Norwich Road

Appendix C: Site GNLP0298 and GNLP0335 Watton Road

Appendix D: Dereham Road highway pinch point

Appendix E: Pedestrian Routes to town centre and school site GNLP0503

Appendix F: Site GNLP0520 Norwich Road access options

Appendix G: Achieved visibility

Appendix H: Pedestrian Routes to town centre and school site GNLP0520

Appendix I: 033/2020/P1 Highway Statement

Appendix J: Drg 033/2020/02P1, Site GNLP0298 and GNLP0335 Proposed highway mitigation

Appendix K: Pedestrian Routes to town centre and school site GNLP0298 and GNLP0335

Appendix L: NCC Policy Officer reply, after seeking clarity on Highway position Site GNLP0298

Appendix A: Site GNLP0503 Dereham Road

New allocations

POLICY GNLP0503: Land north of Springfield Way and west of Dereham Road, Hingham

5.38 Development of up to 20 dwellings would be acceptable on this site 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.

POLICY GNLP0503

Land north of Springfield Way and west of Dereham Road, Hingham (approx. 0.85 ha) is allocated for residential development. This will accommodate 20 homes.

More homes may be accommodated, subject to an acceptable design and layout being achieved, and any infrastructure issues addressed.

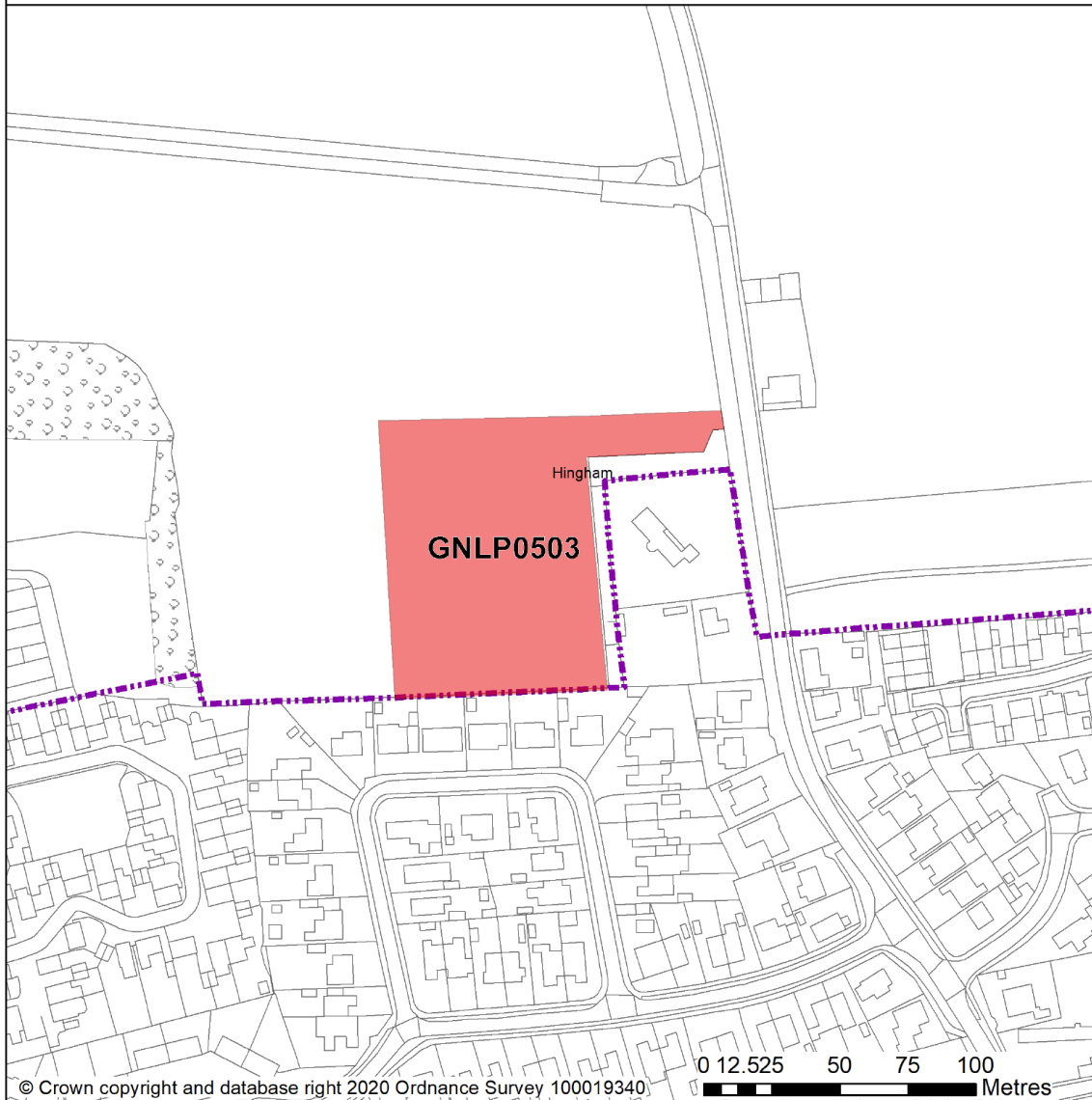
The development will be expected to address the following specific matters:

1. 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.
2. Provision of a continuous footway at the west side of Dereham Road from the site access to Pottles Alley.
3. The design and layout of the scheme will need to consider and mitigate potential amenity impacts of the neighbouring farm operations.
4. Design and layout of the scheme will need to consider and mitigate the areas of surface water flood risk.
5. Avoid contamination of groundwater.

HINGHAM

GREATER NORWICH LOCAL PLAN SITE ALLOCATION FOCUS MAP

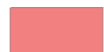


SITE REFERENCE: GNLP0503
LOCATION: Land north of Springfield Way
ALLOCATION: Housing development (20 dwellings)
SITE AREA: 0.85 ha



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0 12.525 50 75 100 Metres

Scale at A4:
1:2,000

-  Housing Allocation
-  Settlement Boundary
-  Parish Boundary

*new and extant permission at 1st April 2020

N
Date: 02/11/2020

POLICY GNLP0520: Land south of Norwich Road, Hingham

5.39 The site boundary has been drawn to avoid areas of surface water flood risk and the most significant historic environment impacts. The site is well located on the eastern approach into the village adjacent to a site allocated in the last local plan, and will form the gateway to Hingham when approaching from the east. 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. The site is allocated at a lower gross density than usual, as the surface water drainage area needs to be significant and the need to mitigate impact on nearby listed buildings and protect TPO trees has been taken into account. The net density will be in line with the indicative minimum in Policy 2.

POLICY GNLP0520

Land south of Norwich Road, Hingham (approx. 6.92 ha) is allocated for residential development. This will accommodate approximately 80 homes.

More homes may be accommodated, subject to an acceptable design and layout being achieved, and any infrastructure issues addressed.

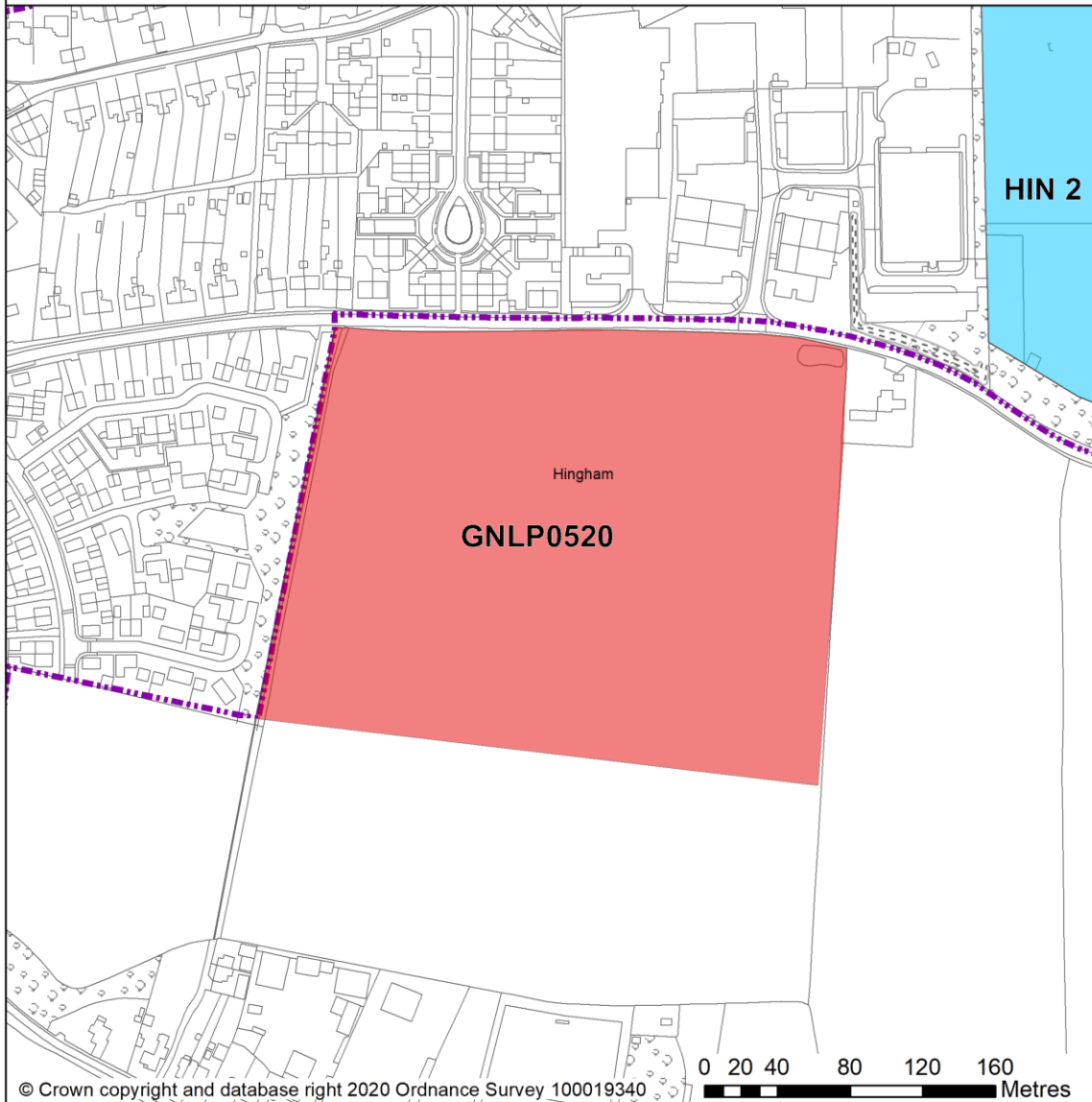
The development will be expected to address the following specific matters:

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.
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.

HINGHAM

GREATER NORWICH LOCAL PLAN SITE ALLOCATION FOCUS MAP

SITE REFERENCE: GNLP0520
 LOCATION: Land south of Norwich Road
 ALLOCATION: Housing development (80 dwellings)
 SITE AREA: 6.92 ha



- Housing Allocation
- Employment Allocation
- Settlement Boundary
- Parish Boundary

*new and extant permission at 1st April 2020


Scale at A4:
1:3,000

N



Date: 02/11/2020

Appendix C: Site GNLP0298 and GNLP0335 Watton Road

Land south of Watton Road	GNLP0335	5.81	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.
				
				This site is not considered to be suitable for allocation as

Appendix D: Dereham Road highway pinch point



Appendix E: Pedestrian Routes to town centre and school Site GNLP0503

This drawing is a print and must not be soaked except where required for planning submissions. All new and existing dimensions and levels shown on the drawing to be checked prior to commencement of work, and any discrepancies to be reported to Claydon Architects.

Any construction work carried out prior to receiving all necessary approvals is entirely at the clients risk.

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THE ABOVE SIGNED APPROVES CONFIRM ACCEPTANCE OF ISSUED DRAWINGS

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This drawing is a print and must not be scaled except where required for planning submissions. All new and existing dimensions and levels shown on the drawings to be checked prior to commencement of work, and any discrepancies to be reported to Caglayan Architects.

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7. Evaluate Forecast Drawing our Budget Chart.



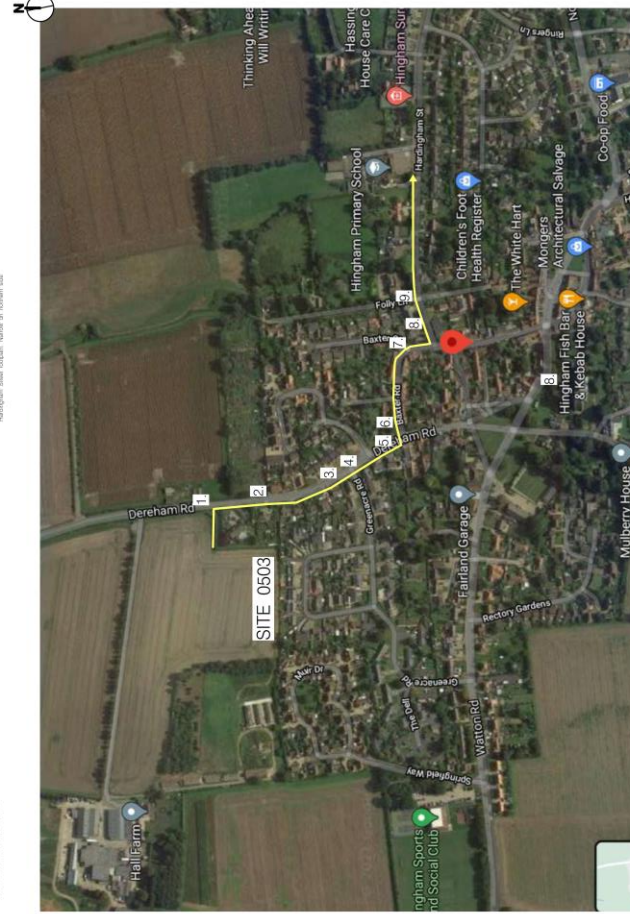
6. Boston and Foreman: Measure not mentioned table

4. Boardside Footpath Crossing over Greenleaf Road

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9. Frontside crossing over Fatty Lane.



Pedestrian Route to Primary School
650m approx. walk to Primary School distance



100



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REV	DATE	NOTE	BY

Clayland
architects

The Glass House, Lynton Gardens
Lynton Road, Mundford, Norfolk, IP25 3HW
info@citylandarchitects.co.uk www.citylandarchitects.co.uk

CONTRACT

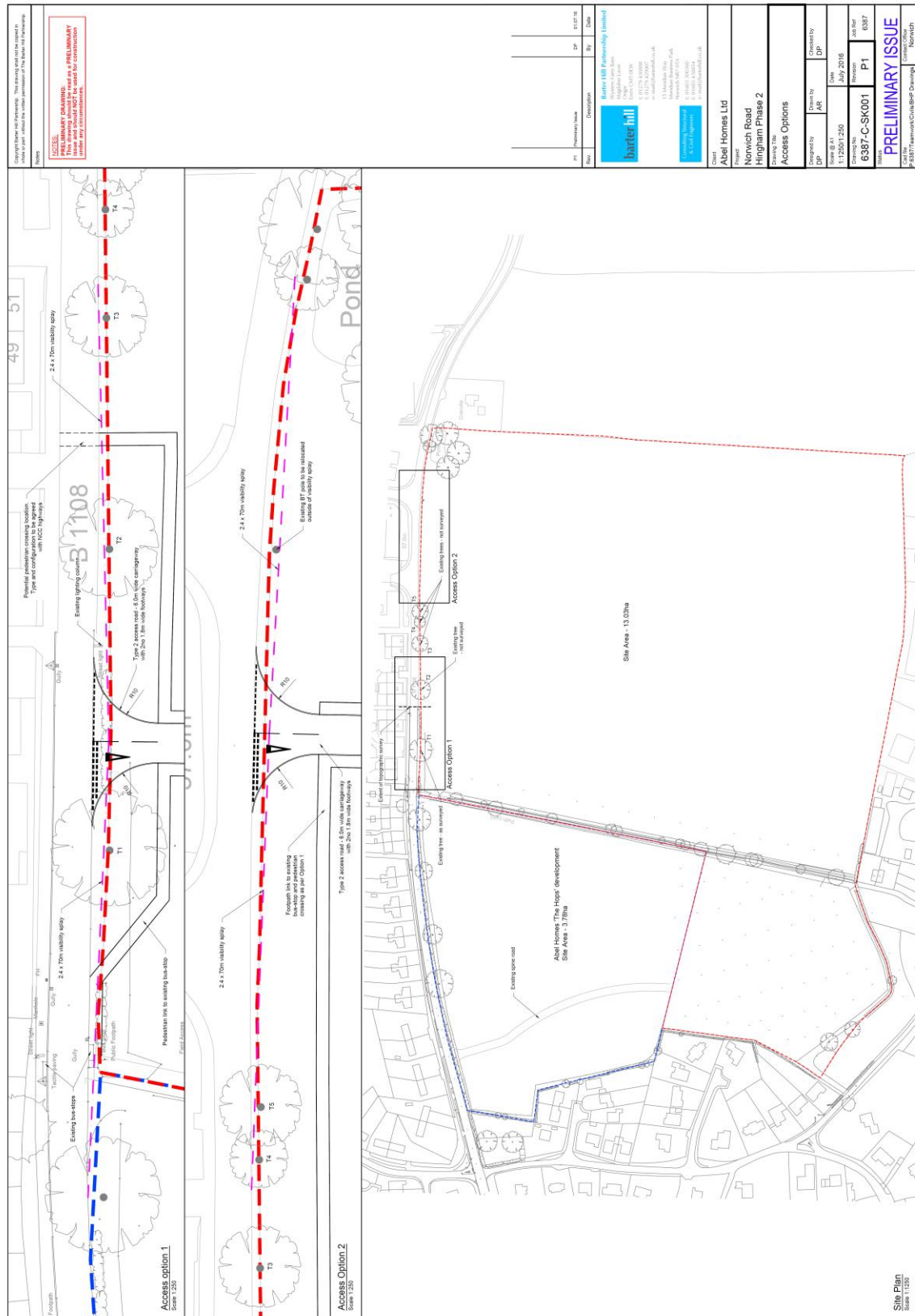
GNIP Eviction, Boardwalk, Enderbush

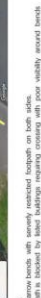
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SITE 0503

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DATE: 2021			
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Appendix F: Site GNLP0520 Norwich Road access options

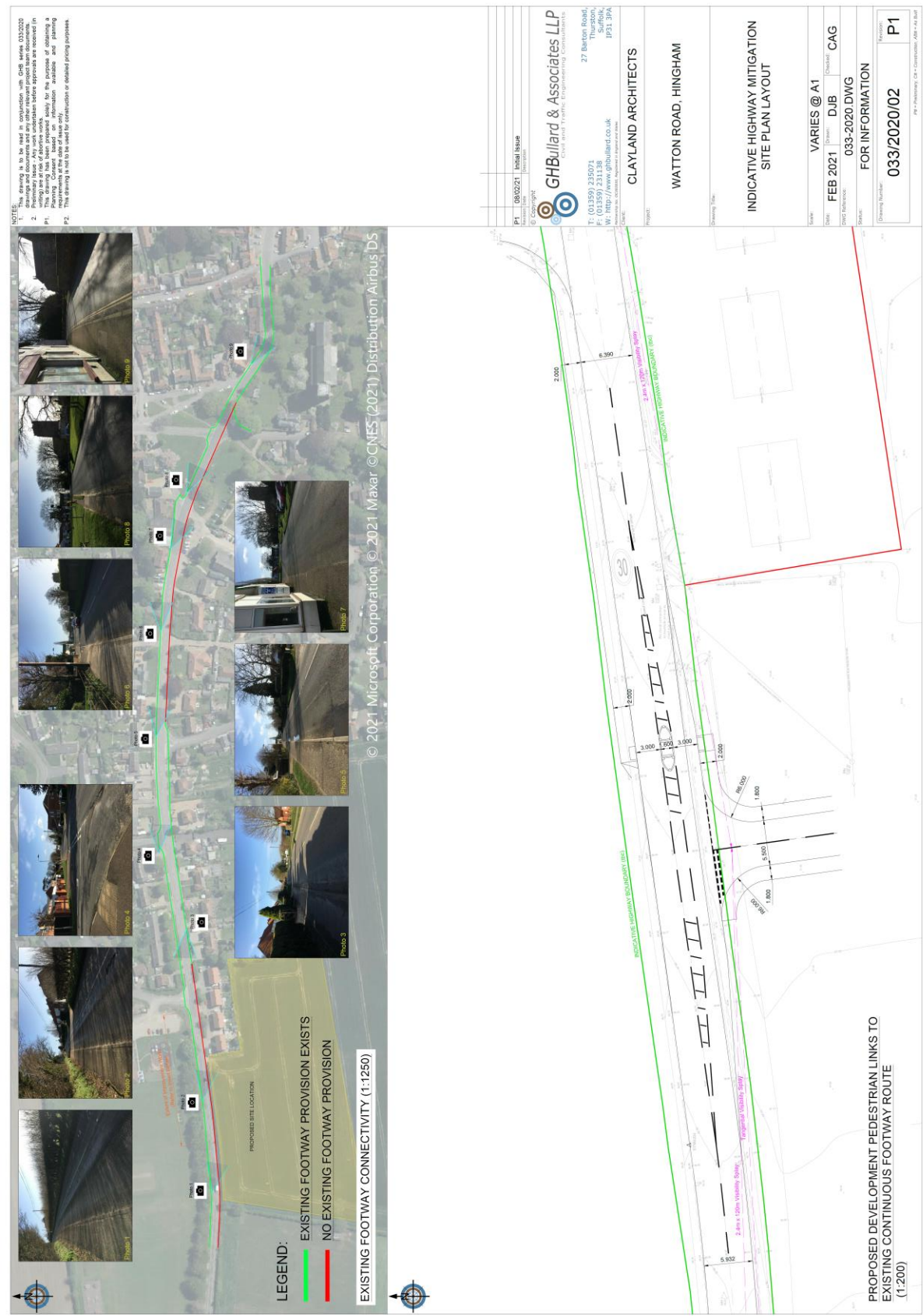


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Appendix I: 033/2020/P1 Highway Statement

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Appendix J: Drg 033/2020/02P1, Site GNL0298 and GNL0335 Proposed highway mitigation



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Appendix L: NCC Policy Officer reply, after seeking clarity on Highway position Site GNLP0298

From: Baker, Carole <carole.baker@norfolk.gov.uk>

Sent: 15 January 2021 11:17

To: Carol Grimsey <carol@ghbullard.co.uk>

Cc: Jacklin, Adrian <adrian.jacklin@norfolk.gov.uk>; Doleman, Richard <richard.doleman@norfolk.gov.uk>; Wilson, David - ETD <david.wilson@norfolk.gov.uk>; Ragan, Anita <anita.ragan@norfolk.gov.uk>

Subject: Site GNLP0298 in Hingham

Dear Carol

I am messaging in response to your original email to Adrian Jacklin dated 6th January. Colleagues in NCC Highways have considered the points you raise in your email and have asked me to respond directly to you as it is related to a Greater Norwich Local Plan site.

NCC Highway colleagues were involved in the assessment of sites promoted for inclusion in the GNLP. Initial site assessments took place between January and July 2019 to inform the draft version of the plan (Regulation 18C) which was consulted on between January – March 2020. Site assessments were then revisited following the Regulation 18C consultation, including further discussion with colleagues such as NCC Highways and changes were made to the selection of sites where it was considered appropriate based on new information submitted.

Highway colleagues have advised that the original view they provided regarding the site has not altered e.g. 'The Highway Authority maintain that it does not appear to be feasible to provide an acceptable footway between the site and local facilities'. The principle concern is that the highway verge to the east of the site appears to be limited in width and is raised above the carriageway. It is not clear that an acceptable 2.0m wide footway can be provided within the highway at the south side of the B1108 to connect the site with local facilities. In addition if the verges need to be reduced in height to provide the required footway and visibility splays the viability of adjacent hedges could also be affected. Due to these constraints it was not considered that the site could reasonably be allocated 'subject to footway provision' as other sites in the plan are.

As you will probably be aware the site is currently not proposed for allocation in the Greater Norwich Local Plan, primarily due to the fact that allocating this site in addition to the preferred site would result in a level of growth which may swamp the town's services, with the feasibility of providing a footway link from the site to the centre of Hingham a deciding factor in the choice of sites. We are expecting to commence the Regulation 19 publication stage on the 1st February and the plan is currently going through the formal sign off procedures at the constituent authorities Cabinet meetings. The Broadland and South Norfolk Cabinets have taken place, with only the Norwich meeting to go next week. Although we can make minor changes under delegated authority following the Cabinet meetings we will not be making major changes to the plan at this stage once Cabinet sign off has taken place. However there is an opportunity to make representations at the publication stage, in relation to the soundness and legal compliance of the plan, which will then be considered by the Local Plan Inspector at the examination hearing.

Kind regards
Carole

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From: Carol Grimsey

Sent: 11 January 2021 13:35

To: david.wilson@norfolk.gov.uk

Subject: Draft allocations for the GNLP: Hingham 0298 (033 2020)

Hello David,

Your colleague Richard has emailed you my query earlier today:

I am emailing hoping that you can shed light on the Highways response in regards to site GNLP0298 (attached Pg 77 and extract below) where all the document states is *'The Highway Authority maintain that it does not appear to be feasible to provide an acceptable footway between the site and local facilities'*.

Are you able please to advise which officer would have provided this response?; and when?

The *Highway Statement* (attached) was prepared in March 2020, in support of this site.

It is not stated, or clear, if this was taken into account at all in the quoted HA comment.

There is footway and crossing provision set out in the proposed site mitigation, hence we cannot understand where the stated Highways objection comment originates from.

I also now attach a photo map which shows the sites footpath connections.

In addition to this, there is a crossing point and extra frontage path which can be delivered if required (as set out in the *Highway Statement* mitigation).

Other local sites (with less favourable/unsafe pedestrian accessibility) are allocated 'subject to footway provision' - hence I cannot see why this could not be the case for site *Hingham 0298* too.

I understand it is not too late for correction to be made, if there has been an oversight in this stated HA comment.

Please could you get back to me with any clarifications. Thank you so much,

Kind Regards

Carol Grimsey CEng CIHT

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0298 Land opposite Hingham Sports Centre, Watton Road, Hingham (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	6 (was 8 but Hingham PC and site promoter duplicated)
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 4 Object, 2 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Hingham Town Council (email and web)	Object	No more sites should be allocated in Hingham until existing allocations in core strategies have been developed. However, this site is supported, can provide footpath and woodland.	<ul style="list-style-type: none"> • Footpath is possible? • Consider landscape impacts 	Undeveloped former allocations are reviewed and taken into account when determining the level of new allocations. The Highway Authority maintain that it does not appear to be feasible to provide an acceptable footway between the site and local facilities. Allocating this site in addition to the preferred site	None

				would result in growth which may swamp the town's services.	
Site promoter (2 reps)	Object	Site scores more favourably in HELAA than preferred site. Site is linked to adjacent site (0335) and proposal for 4.2ha community woodland (4007). Services are walkable, footpath achievable, woodland offered.	<ul style="list-style-type: none"> Consider constraints and new evidence: masterplan, phased layout, planning statement, highways statement, ecological assessment, new woodland proposal 	Significant new evidence has been submitted. However, the Highway Authority maintain that it does not appear to be feasible to provide an acceptable footway between the site and local facilities. Despite the proposal to deliver community woodland, allocating this site in addition to the preferred site would result in growth which may swamp the town's services.	None
Members of the public	Object	Can't see why site is unreasonable. Community woodland and footpath are achievable.	<ul style="list-style-type: none"> Footpath is possible? 	The Highway Authority maintain that it does not appear to be feasible to provide an acceptable footway between	None

				the site and local facilities. Despite the proposal to deliver community woodland, allocating this site in addition to the preferred site would result in growth which may swamp the town's services.	
Members of the public	Comment	Can't see why site is unreasonable. Better than preferred site.	<ul style="list-style-type: none"> • Footpath is possible? 	The Highway Authority maintain that it does not appear to be feasible to provide an acceptable footway between the site and local facilities. Despite the proposal to deliver community woodland, allocating this site in addition to the preferred site would result in growth which may swamp the town's services.	None

Kind Regards

Carol Grimsey CEng CIHT

Associate

For and on behalf of

GHBullard & Associates LLP