



**Greater Norwich Local Plan
Focused Regulation 18 Consultation Response
Proposed Allocation Site Reference GNLP0341**

Land between Shelfanger Road and Mount Street, Diss

Prepared by Strutt and Parker on behalf of M Scott Properties Ltd
December 2018

Site Name:		Land between Shelfanger Road and Mount Street, Diss
Client Name:		M Scott Properties Ltd
Type of Report:		Reg 18 Consultation Response
Prepared by:		Adam Davies
Checked by:		Paul Sutton
Date:		14/12/2018

COPYRIGHT © STRUTT & PARKER. This publication is the sole property of Strutt & Parker and must not be copied, reproduced or transmitted in any form or by any means, either in whole or in part, without the prior written consent of Strutt & Parker. Strutt & Parker does not accept any liability in negligence or otherwise for any loss or damage suffered by any party resulting from reliance on this publication.

Contents

1. INTRODUCTION	2
2. PLANNING POLICY CONTEXT	4
3. PROPOSED DEVELOPMENT SITE	11
4. HELAA ASSESSMENT	15
5. CONCLUSIONS	24

Version	Description	Originated	Authorised/comments	Date
Draft	For comment	AD	PS	13/12/2018
Final	For submission	AD	PS	14/12/2018

1. INTRODUCTION

- 1.1 This Consultation Response to the Focused Regulation 18 Consultation to the Greater Norwich Local Plan (GNLP), Housing and Economic Land Availability Assessment (HELAA) Addendum, October 2018 has been prepared by Strutt & Parker on behalf of M Scott Properties Ltd (Scott Properties), in respect of the proposed allocation site at Land between Shelfanger Road and Mount Street, Diss.
- 1.2 This consultation response relates to site reference GNLP0341 in the original December 2017 HELAA, however, as part of the focused consultation on the October 2018 HELAA Addendum it is considered that the site should be reassessed as the proposals have fundamentally changed from the original submission following discussions with Diss Town Council and the Diss and District Neighbourhood Plan Steering Group, and as a result of further demographic and market research. The size of the developable area being promoted and resultant number of units has been reduced. Furthermore, the site is being promoted for inclusion in the emerging Diss and District Neighbourhood Plan, in part to assist with the delivery of landscape improvements to the site, known locally as 'Parish Fields', and to facilitate public access and recreational use.

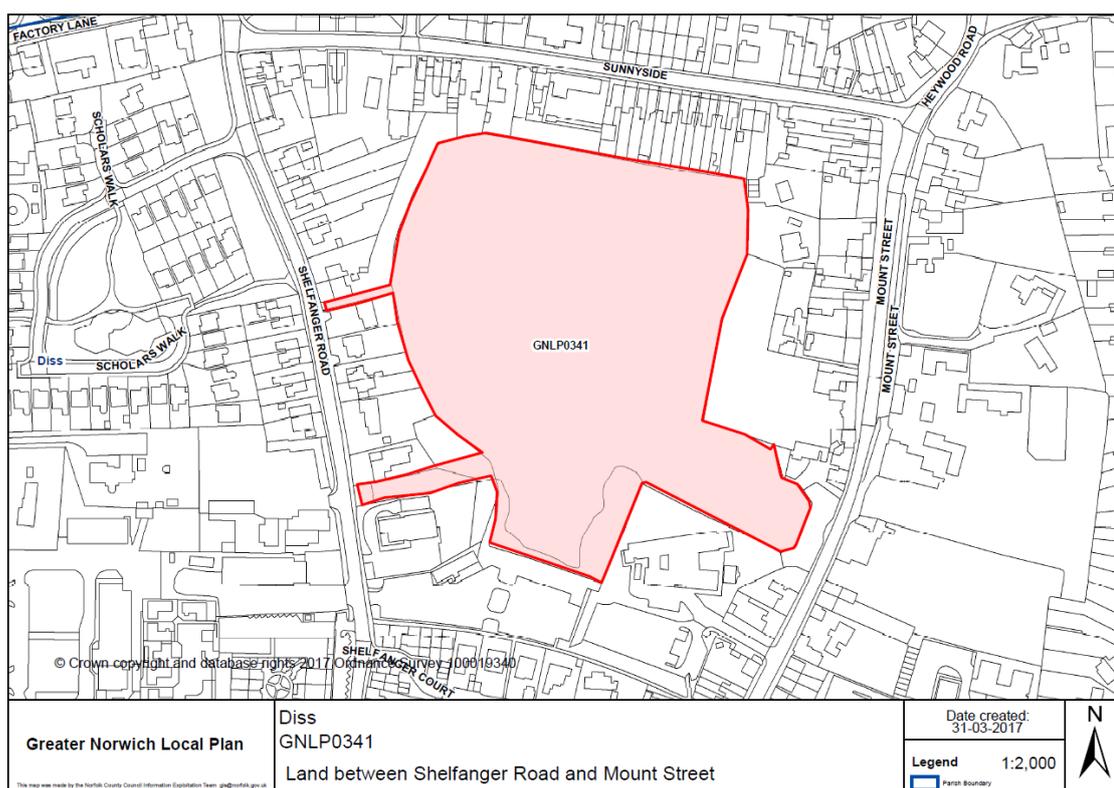


Figure 1: Site Plan

1.3 This submission is supported by the following Appendices, consisting of plans, supporting documents and technical assessments:

- a. App. 1 – Illustrative Masterplan
- b. App. 2 – Experian Demographic Report
- c. App. 3 – Gainsford Gardens Brochure
- d. App. 4 – Highways and Transportation Summary Note
- e. App. 5 – Utilities Overview Note
- f. App. 6 – Flood Risk Assessment Summary Note
- g. App. 7 – Landscape Summary Note
- h. App. 8 – Landscape Design Strategy
- i. App. 9 - Preliminary Ecological Appraisal Update

1.4 This report includes the following sections:

- **Planning Policy Context:** identifies the relevant local and national planning policy context within which the proposals should be considered;
- **Proposed allocation site:** sets out the site context, opportunities and constraints and deliverability;
- **HELAA Assessment:** considers the assessment criteria, constraints analysis and impact analysis for the site and provides additional information/evidence to support the allocation; and
- **Conclusions:** provides a summary of the overall conclusions.

2. PLANNING POLICY CONTEXT

Adopted Local Plan

- 2.1 The subject site of this consultation response falls within the District of South Norfolk where the current development plan comprises a number of documents, the key ones being the Greater Norwich Joint Core Strategy (2014) and the South Norfolk Local Plan – Site Specific Allocations & Policies DPD (2015) and the South Norfolk Local Plan Development Management Policies Document (2015).

Joint Core Strategy

- 2.2 The Joint Core Strategy covers Broadland, Norwich and South Norfolk and was adopted in March 2011, with further updates in respect of Broadland District adopted in January 2014. It covers the period to 2026 and sets out the long-term vision and objectives for the area, including strategic policies for steering and shaping development and identifies broad locations for housing and employment growth. The strategy seeks to identify space for 37,000 new homes and 27,000 jobs. The focus of housing growth is the Norwich Policy area where 33,000 new homes are identified. Moderate growth is also proposed in the other principal towns and larger villages. There are four Main Towns: Aylsham (300 new homes - subject to resolution of sewage capacity constraints); Diss (300 new homes); Harleston (200 - 300 new homes); and Wymondham (2,200 dwellings – falls within Norwich Policy Area). Policy 13, confirms that these are minimum housing numbers to be accommodated.

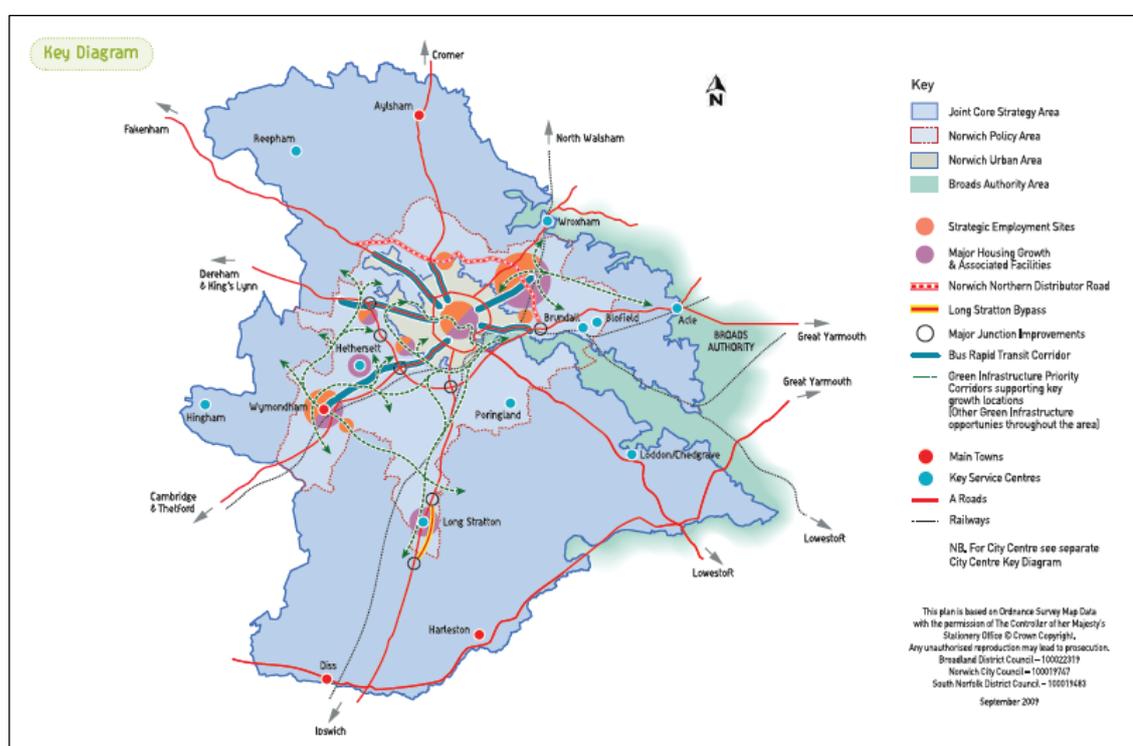


Figure 2: Key Diagram

South Norfolk - Site Allocations Document

- 2.3 The Site Specific Allocations and Policies (Site Allocations) Document is part of the South Norfolk Local Plan. Guided by the Core Strategy, designates areas of land to deliver housing, employment, recreation, open spaces and community uses. The document was formally adopted on 26 October 2015 and covers the period up to 2026.
- 2.4 In accordance with the Core Strategy, a minimum of 13,156 homes was assessed to be the need for the South Norfolk Area. The majority of this growth is focused in the Norwich Policy Area (NPA), which includes the Cringleford Neighbourhood Plan, and the Wymondham and Long Stratton Area Action Plans. Outside the NPA, in the rural part of South Norfolk, the Core Strategy required provision for 2,368 – 2,908 dwellings. The Site Allocations Document identifies 3,149 units by allocating sites for an additional 1,129 on top of existing completions and commitments.
- 2.5 In Diss, four sites were allocated for housing totalling 217 dwellings. These are identified on inset Map 007 below.

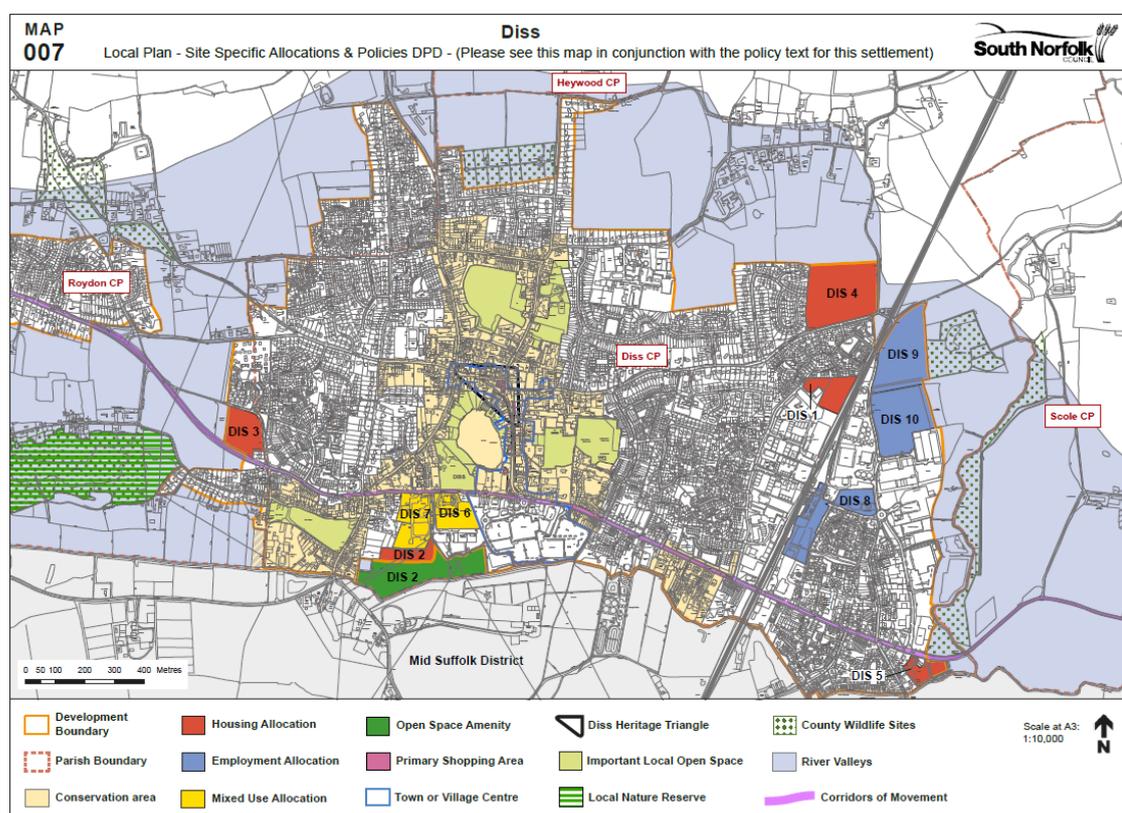


Figure 3: Diss Inset Map

- 2.6 The inset map also identifies significant areas in the town as Important Local Open Space, which are also shown on Map 4.4 of the Development Management Policies Document which was adopted in 2015. These all fall within the wider conservation area. The wider site the subject of this consultation is one of these designations which is listed as follows:

Parish Fields: An interesting space with the entrance off Mount Street purposely designed to enhance the setting of The Cedars a grand listed building on the road opposite. It is

possible that the house was also remodelled to present its main elevation to the west to acknowledge the land opposite.

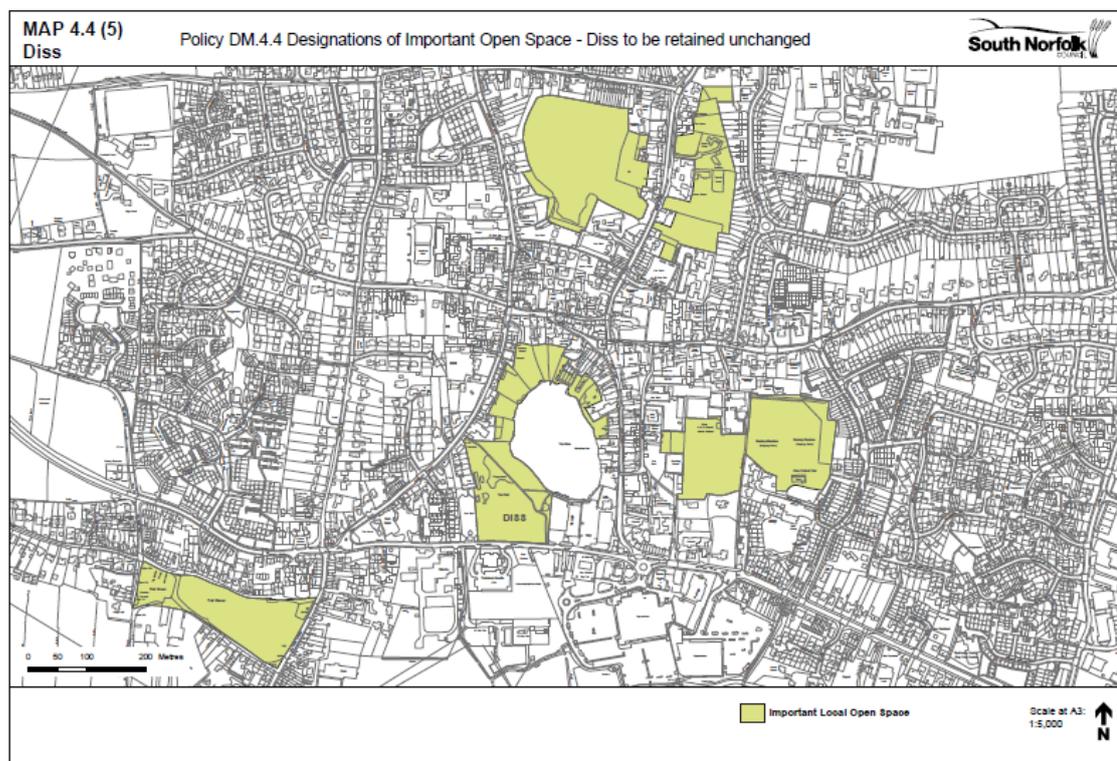


Figure 4: Policy DM 4.4 Designations for Diss

2.7 In respect of these local designations **Policy DM 4.4 Natural environmental assets – designated and locally important spaces** at subparagraph (b) states:

b) **At the Important Local Open Spaces identified in paragraphs 4.32 – 4.44 and on Maps 4.4 (1) – (6) and on the Proposal Map, development will only be permitted where it retains the open character and appearance of the site, where it respects the contribution which the identified open site or open frontage makes to the form and character of the Settlement and where there is no significant adverse impact on the setting of any existing building. New development impacting on these designated sites will be required to contribute positive improvement of these natural environmental assets where opportunities arise.**

2.8 The Council also committed to an early review of the South Norfolk Local Plan which commenced with the preparation of a new Strategic Housing Market Assessment in 2015.

The National Planning Policy Framework

2.9 The “*presumption in favour of sustainable development*” is still at the heart of the National Planning Policy Framework 2018 (NPPF). The Planning and Compulsory Purchase Act 2004 (section 39(2)) establishes a legal requirement for plans to be prepared with the objective of contributing to the achievement of sustainable development.

2.10 Paragraph 8 of the NPPF reminds us that for achieving sustainable development the planning system has three overarching objectives, an economic, a social and an

environmental objective, which are interdependent, and need to be pursued so that opportunities can be taken to secure net gains across each objective. Paragraph 9 indicates these objectives should be delivered through the preparation and implementation of plans.

2.11 For plan-making Paragraph 11 requires that:

“...plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change...”

2.12 It goes on to require that as a minimum, plans should provide for objectively assessed housing needs of the area.

2.13 The 2018 NPPF maintains the Government’s commitment to a genuinely plan-led planning system and requires Local Planning Authorities to prepare and keep up-to-date plans which provide a positive vision for the future of their area looking ahead over a minimum 15-year period with regular reviews at least once every five years.

2.14 Local Plans have to be positively prepared, in a way that is aspirational but deliverable. They also have to be justified, effective and consistent with national policy.

2.15 In respect of housing, planning policies are required to identify specific and deliverable sites for the first five years and further specific and developable sites or broad locations for growth, for years 6-10 and 11-15 where possible, in order to meet their identified housing needs.

2.16 In respect of the delivery of a sufficient supply of homes paragraph 59 advises that:

“...it is important that a sufficient amount and variety of land can come forward where it is needed...”

2.17 Paragraph 68 of the NPPF recognises the importance that small and medium-size sites can play in the contribution to housing requirement as they are often built out relatively quickly. The revised NPPF has introduced a new requirement for plans to accommodate at least 10% of their housing requirement on sites no larger than one hectare. Neighbourhood planning groups are also encouraged to consider opportunities for allocating small and medium-sized sites in their area. The Independent Review of Build Out, Final Report (Letwin Review) October 2018 also recognised the importance that a variety of smaller development parcels offering a range of product can play, to avoid market saturation and consequently speed up housing delivery.

2.18 Minimum need is now determined using the standard method set out in national planning guidance.

2.19 Local authorities are also now required to monitor housing development through the new Housing Delivery Test to support the Government’s objective of significantly boosting the supply of homes.

2.20 Currently, the rural parts of South Norfolk are unable to demonstrate a five-year housing land supply. Furthermore, at the time of writing the housing delivery figures expected to be published by the Government in November 2018 were still not available.

Diss Conservation Area Appraisal

2.21 The Diss Conservation Area Character Appraisal and Management Plan (2012), notes that trees and open spaces have a more significant contribution to the character and appearance of the Conservation Area, than for any other Conservation Area in the district. It goes on to note that schemes for new planting should be encouraged to help ease the impact of any loss that may occur in the future. The Appraisal notes there are many trees of significance and in the Mount Street area and specifically refers to the Parish Fields. The Conservation Area Appraisal identifies five main open spaces, one of which is the Cedars and the Lawn (Parish Fields). In respect of recommendations and management proposals, under the section on the Diss Heritage Triangle, one of the specific enhancement proposals is stated as:

“encourage and support greater public access to the Parish Fields and repair wall and railings on Mount Street frontage.”

2.22 Below is an extract from the Diss Conservation Area streetscape map. This shows the listed buildings coloured pink, buildings of townscape significance coloured orange and key views are identified, one of which is at the entrance to the Parish Fields on Mount Street.

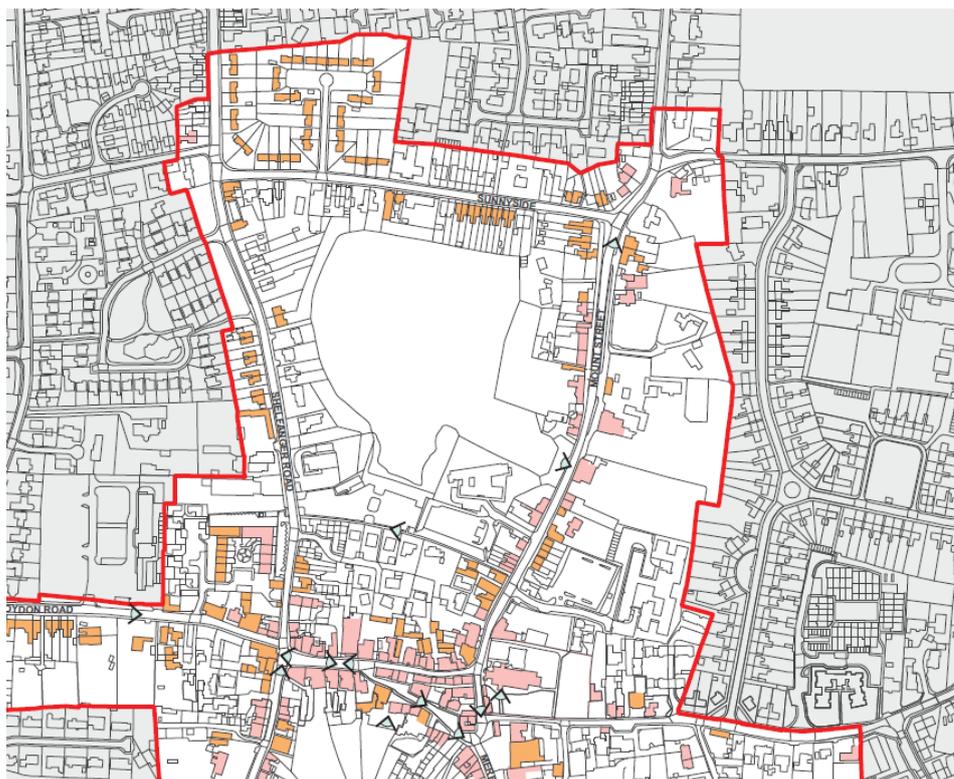


Figure 5: Conservation Area Street Scape Map Extract

Neighbourhood Planning

2.23 The revised NPPF maintains the Government's commitment to neighbourhood planning. It recognises that the presumption in favour of sustainable development has implications for the way communities engage in neighbourhood planning. Neighbourhood plans can help shape, direct and influence the way a local area is developed. Paragraph 14 of the NPPF provides greater certainty to local communities, that when a neighbourhood plan is brought

into force, that the policies and allocations within it will take precedence over existing non-strategic policies in a local plan, and in situations where the paragraph 11d presumption applies, safeguards against development which is in conflict with an up-to-date neighbourhood plan.

- 2.24 In July 2017 a Neighbourhood Area was formally designated for the Diss and District Neighbourhood Plan. Diss itself serves as a central market town serving the six surrounding parishes in South Norfolk and Mid Suffolk. The seven parishes joined together to commence work on a joint neighbourhood plan. The steering group identified a number of themes and aims and also local issues for each parish, which it published for public consultation, in February and March 2018. Having assessed the results, a report on the consultation was published in April 2018. The outcome of the consultation confirmed the initial assessment of the issues raised and provided the Steering Group with the confidence and weight of public opinion to take the plan forward. Further detail is provided at paragraph 3.8 to 3.13.

Greater Norwich Local Plan

- 2.25 Following adoption of the Joint Core Strategy and site allocation documents for the area between 2011 and 2016, in order to keep the existing Core Strategy and Local Plans up to date work commenced on the new Greater Norwich Local Plan (GNLP). The GNLP will extend the plan period from 2026 to 2036. Furthermore, the newly introduced standard method for calculating housing needed indicates that 39,000 new homes will be required for the period 2017 to 2036. At April 2017 there were approximately 35,700 new dwellings either allocated or with planning permission, leaving a requirement of a minimum of 7,200 additional dwellings to be identified in the new local plan.
- 2.26 The Greater Norwich Development Partnership undertook a Regulation 18 Issues and Options consultation between January and March 2018. This included six proposed growth distribution options and four options for new settlements. No decision has yet been made on the preferred option and it is likely it could be a mix of a number of options. The preferred option will be published in the draft plan consultation, currently programmed for September / October 2019.

Housing and Economic Land Availability Assessment

- 2.27 A key evidence base document underpinning the plan making process is the Housing and Economic Land Availability Assessment (HELAA). The HELAA is a broad assessment of potentially available land. The national planning practice guidance (PPG) notes that:

“...the assessment is an important evidence source to inform plan making, but does not in itself determine whether a site should be allocated for development.”

- 2.28 In 2016 the HELAA methodology was agreed, and in May 2016 the Greater Norwich authorities launched a Call for Sites. As at 31st July 2017, total of 562 sites were submitted. Those put forward for housing, employment and commercial use were assessed through the December 2017 HELAA. The December 2017 HELAA identified approximately 3,700 hectares of potentially suitable land which for housing amounted to approximately 69,000 dwellings.

- 2.29 Over 200 additional or revised sites were submitted between 31st July 2017 and 31st August 2018. These sites were assessed in the October 2018 HELAA Addendum which identifies approximately a further 1,100 hectares of potentially suitable land which after adjustments equates to approximately 22,000 additional dwellings.
- 2.30 Combining the two assessments indicates the total area of land potentially suitable for housing (or mixed use with a significant element of housing) totals some 4,800 hectares which could accommodate up to 91,000 dwellings.

3. PROPOSED DEVELOPMENT SITE

Context

- 3.1 Diss is an attractive market town with the largest number of shops and services in South Norfolk outside of Norwich. It serves a large rural catchment covering parts of South Norfolk and northern Suffolk. It has an attractive historic core and town centre with sizeable employment areas located next to the railway station. It has good rail links to both Norwich and London with a half-hourly mainline railway service, as well as bus services to Norwich and the surrounding settlements.
- 3.2 The town sits predominantly on the northern side of the A1066 which connects to Thetford in the west and the A143 and A140 to the east, which provide onward links to Norwich, Great Yarmouth, Bury St Edmunds and Ipswich. Approximately 3 miles south, lies the town of Eye, in Mid Suffolk. On the former Eye Airfield is the mid Suffolk Business Park, which offers significant employment opportunities and has been earmarked for further employment development.
- 3.3 Diss lies on the southern extremity of the Greater Norwich Local Plan rural area, beyond the Norwich Policy Area to the north. Diss is identified as one of the four Main Towns in Policy 13 of the Joint Core Strategy suitable to accommodate growth of a minimum of 300 new dwellings to 2026.
- 3.4 The town's development is constrained by the river Waveney to the south, and the valley of the river Frenze to the north and east, both sensitive landscapes. The town is also sensitive to coalescence, being separated by areas of open fields to the west from the village of Roydon, and to the north east from the nearby hamlet of Walcot Green.
- 3.5 Diss has an excellent range of services and facilities for a settlement of its size, including a number of supermarkets and a high school, reflecting its role as a market town serving a wider rural catchment. It has an extensive range of shops and facilities including restaurants, cafes, bars, hotels, banks along with community facilities, medical centre, schools and sports facilities. There is an extensive range of open spaces and playing fields. The town also has a rich heritage of historic buildings within the town centre conservation area which includes Diss Park and The Mere, adjacent to the main core shopping streets and marketplace, which hosts a regular market.

The Site

- 3.6 The wider site is known locally as 'Diss Lawns' and also the 'Parish Fields'. It is an area of undeveloped land between Shelfanger Road to the west and Mount Street to the east. Sunnyside runs along the northern boundary. To the south east is the corner is the Diss Lawns Medical Practice and car park which is accessed via Mount Street. There is a further public car park to the south, accessed from Shelfanger Road. The Diss Youth and Community Centre adjoins the north-western side of the public car park. On the majority of the remaining site boundaries are residential properties with their rear gardens backing on to the site.

- 3.7 The entire site is currently allocated in the South Norfolk Local Plan as important local open space and has a historic association with 60 Mount Street. The land is in private ownership however, and there is currently no public access available to the site.

Neighbourhood Plan and Town Council Engagement

- 3.8 Scott Properties has been engaging with the emerging neighbourhood plan process and Diss Town Council, which has guided the evolution of the proposals. The Neighbourhood Plan Steering Group undertook a public consultation on their Draft Vision and Themes which ended in March 2018. The consultation document set out the key themes. In respect of housing the stated aim was:

“To provide the right type of housing in the right places to meet differing needs in each community.”

- 3.9 Specific local issues were also identified for each of the seven parishes. For Diss they were:

“To develop a plan for the land between the River Waveney to include community uses for the benefit of the whole Area;

Develop a sustainable long-term use for the old infant School site;

Agree acceptable development proposals to ‘unlock’ the Parish Fields for public access.”

- 3.10 The results of the consultation were published in April 2018. In respect of the housing aim stated above, over 86% of respondents either agreed or strongly agreed with the stated aim, taking into account that 7% expressed no opinion, the level of support for this aim is considered to be significant.
- 3.11 In respect of the specific local issues, again overall there was 86% support for these, with some 48% strongly agreeing with them. Those expressing no opinion were 9% and only 5% disagreeing. Clearly, there is a considerable degree of local support for proposals which will ‘unlock’ the Parish Fields for public access through an acceptable development.
- 3.12 Given the central location of the site in the town, its accessibility to local services and facilities, the tranquil nature of the site, and the proposed use for a limited number of retirement bungalows it is also considered that the site represents *“...the right type of housing in the right places to meet differing needs...”*.
- 3.13 The most recent meeting with representatives from the Neighbourhood Plan Steering Group and Diss Town Council was held on 13th December 2018 when the proposed layout (included in this consultation response) was presented to the team. The scheme was positively endorsed and the next step will be to present it formally to the full Town Council for consideration. This will take place in January after this particular consultation has closed; and Scott Properties will provide an update of the Town Council’s response in the form of a Statement of Common Ground as soon as this is available.

The Proposal

- 3.14 The scheme which is currently under discussion would see public access delivered along with a modest development of 24 retirement bungalows, in a sensitive landscape setting as per the Illustrative Masterplan provided at Appendix 1. The development would also deliver the Conservation Area Appraisal's aim of securing the repair of the wall and railing on the Mount Street frontage.
- 3.15 The site would become permeable with pedestrian access linking Mount Street with Shelfanger Road. The important existing landscape features, individual mature trees and groups of important trees would be managed and retained (as set out in the accompanying ecological appraisal) along with the site becoming publicly available for informal recreational use. Further detail on the technical aspects of the proposal is provided within the HELAA Assessment response at Section 4.
- 3.16 The actual developable area would be limited to 1.44 ha, or 45% of the total site area. Accordingly, the HELAA assessment will need to be amended to reflect this reduced site area and number of units. Under the HELAA methodology, it is only residential, employment and commercial uses that should be assessed. Clearly, while the development would enable significant enhancement of the remaining open space and character of the area, it would not be appropriate to include this land as part of the assessment.
- 3.17 When assessing these proposals, the local planning authority will need to consider the site's existing designation as an 'Important Local Open Space'. Currently, there is no public access to this space, and due to the site's enclosure by the surrounding land uses, predominantly residential with some community facilities, its contribution to visual amenity is not significant. It is normal for areas of land designated as open space to have a demonstrable public value, which is often associated with sporting or recreational use or where they provide a more significant visual amenity role. As can be seen from the South Norfolk Local Plan inset map extract below, the central part of the Town contains a significant proportion of open space designations.
- 3.18 Whilst this proposal would result in a minor quantitative reduction in the overall amount of open space in the town, in terms of a qualitative assessment, it would provide significant public benefits. The modest bungalow development proposed would deliver much needed accommodation for the ageing population, potentially allowing local residents to downsize and introduce a compatible built form which would respect the existing landscape features. It would also allow there to be positive natural surveillance of the new publicly accessible space.

Demographic Need

- 3.19 Experian data has been used to estimate the likely housing need in the area for the type of development proposed. The study area is a 10-minute off-peak drive time of Diss town centre, meaning that the majority of the Neighbourhood Plan area is included. It should be noted that given the role of Diss as a local service centre to settlements further afield, a wider study area could also be justified. Within the study area there is a projected increase of 560 people aged 55 and above between 2016 and 2021. The increase in this age bracket accounts for 64% of the total projected population growth within the study area (869), showing that there is likely to be an increasing requirement for housing suited to the needs

of older people. The base data in Figure 6 relates to South Norfolk as a whole and the full Experian Demographic Report is provided at Appendix 2.

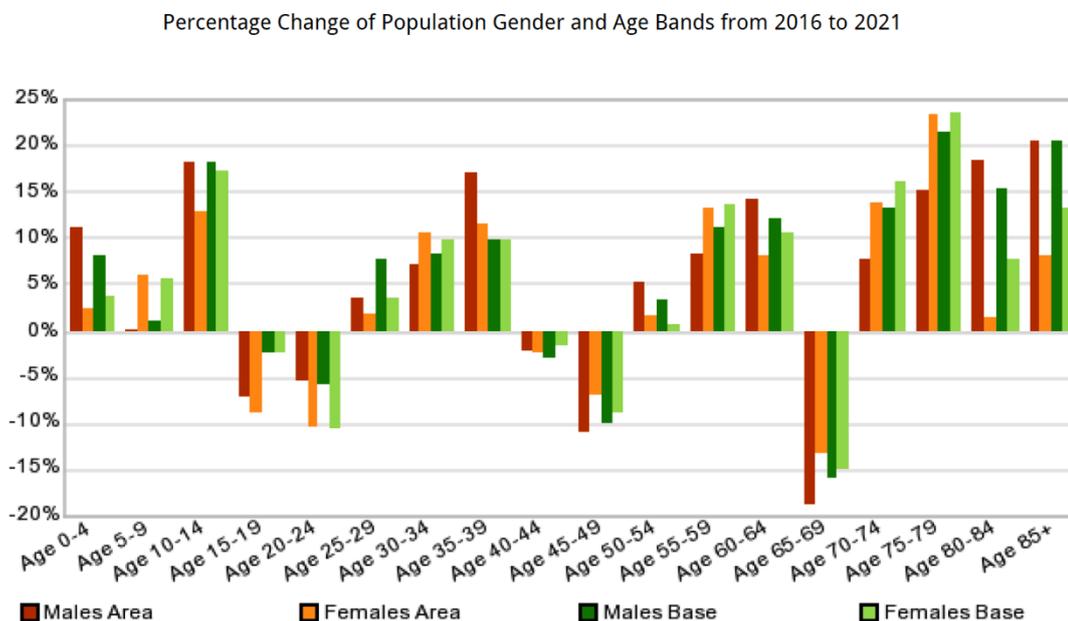


Figure 6: Demographic Data

3.20 There is a relatively high proportion of bungalows within the study area currently (18.8%). Using conservative assumptions that 30% of people within the 55+ age bracket would consider downsizing, that 90% of the existing bungalow stock will already be catering for this requirement, and an average occupancy rate of 1.75; there is an anticipated need for at least 60 additional bungalows within the study area by 2021.

Deliverability

3.21 Scott Residential is a family-run housebuilder based in Colchester and is currently building out two sites in North Essex. The company has plans for significant expansion with a number of additional projects are in the pipeline currently, and sees East Suffolk and South Norfolk as an excellent opportunity area for growth given the strong demographic profile and anticipated high demand for the LifeLong Homes product. Scott Properties is currently promoting the subject site and it is the intention that a full planning application would be submitted, and that Scott Residential will be one of the bidders for the consented site.

3.22 LifeLong Homes by Scott Residential is a specialist form of housing designed to meet the needs and aspirations of people aged 55 and over looking to move to a single storey property which is highly adaptable to changing needs. The properties contain a suite of design features to allow people to live independently for as long as possible, including but not limited to level thresholds throughout, ergonomic fixtures and fittings, and the optional installation of a wet room and activation of a care call facility. The Gainsford Gardens marketing brochure is provided at Appendix 3 as an example of the type of properties that are proposed.

4. HELAA ASSESSMENT

4.1 The figure below identifies the sites which were put forward as part of the December 2017 and October 2018 HELAA assessment.

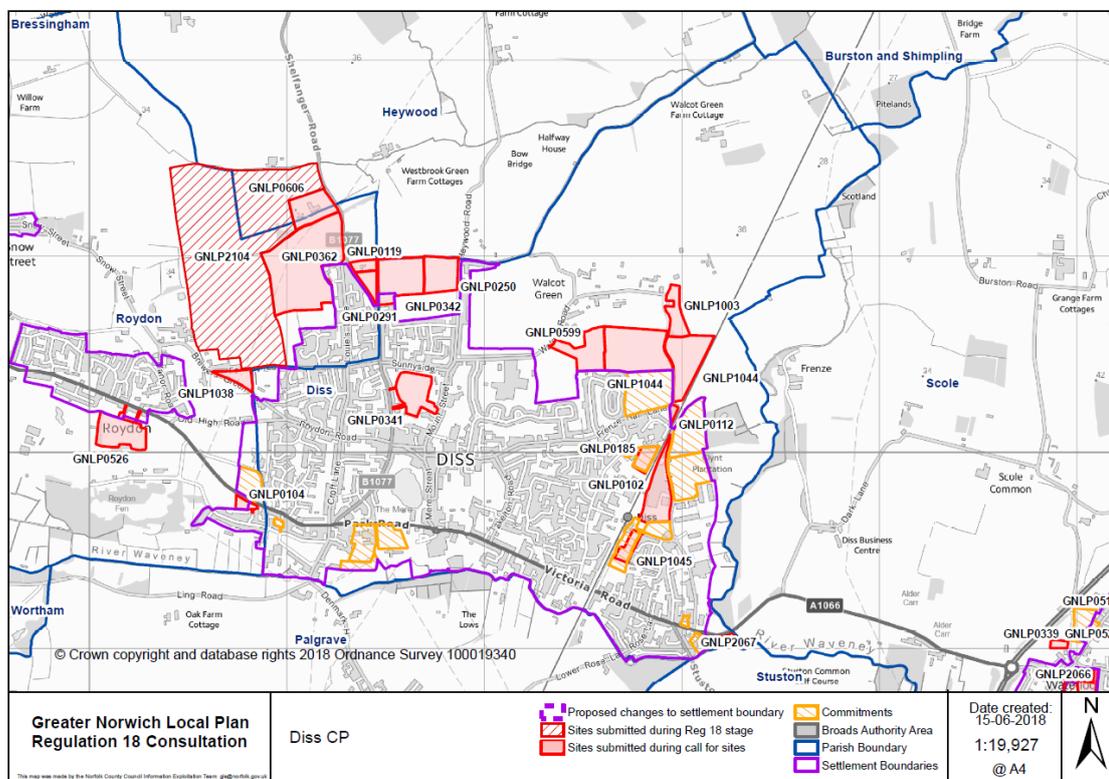


Figure 7: Diss HELAA Sites

4.2 The December 2017 Site Specific Assessment for site GNL0341 is set out on Page 365 of the report and is reproduced below in extract form. A commentary on each section of the assessment has been provided after each extract. The conclusion of the assessment of was that the site was considered to be **unsuitable**. However, it is considered that after further review, given the additional information and evidence accompanying this consultation, the conclusion should be amended to **suitable**.

Diss			
Suitability Assessment			
Site reference	GNLP0341	Site Area	3.21 hectares
LOCATION	PROPOSED DEVELOPMENT		
Land between Shelfanger Road and Mount Street	Residential development of 35 retirement living units, 5 detached dwellings, and land set aside for future Health Centre expansion		
District	South Norfolk		

- 4.3 It should be noted that the proposed area for assessment is significantly reduced from the 3.21 hectares to 1.44 hectares which reflects the extent of the wider site. However, for the purposes of this HELAA Assessment which seeks to identify land suitable for residential, employment and commercial development only, a reduced site area should be included to reflect the fact that it is only the western side of the site that will be developed for residential use. While at the planning application stage of development the entirety of the site would be included, this would be necessary to secure the future management and delivery of public access to the remainder of the site as shown on the plans included with this consultation response.
- 4.4 The proposed development should also be amended to reflect the proposal is now for a residential development of 24 single storey, retirement living units with a new vehicular access from Shelfanger Road.
- 4.5 There is still the possibility for land to be made available to facilitate the future expansion of the medical centre, but this does not form part of the proposals currently.

Constraints Analysis

CONSTRAINTS ANALYSIS	
Access	Amber
Accessibility to Services	Green
Utilities Capacity	Amber
Utilities Infrastructure	Green
Contamination and Ground Stability	Green
Flood Risk	Amber
Market Attractiveness	Green

Access

- 4.6 Access has been scored an Amber. The accompanying Highways and Transportation Summary Note, produced by Cannon Consulting Engineers (Appendix 4) demonstrates that a new vehicular access, with a 5.5m wide carriageway and 1.5m footways either side can be provided between 30 and 36, Shelfanger Road, to the north of the existing Diss Youth and Community Centre. The accompanying assessment also concludes that appropriate visibility splays can be provided, along with the necessary forward visibility into the site. Further pedestrian / cycle access is proposed between 46 and 48 Shelfanger Road, where the total width available is over 3.5m. To the east of the site, a pedestrian / cycle access is also proposed between 19 and 22 Mount Street, where the site benefits from over 40m of frontage to Mount Street. This will create a comprehensive and highly attractive link between Shelfanger Road and Mount Street for the benefit of the local community, increasing the sites permeability and people's ability to walk to services and facilities.
- 4.7 The Highways and Transportation Summary Note confirms that suitable access is available for both the construction and occupation phases of the development, without any constraints. It also confirms that this has been scoped out with the highways authority previously for a larger development of up to 40 units, so the proposed development will have a reduced

impact from what had previously been agreed as being acceptable. Accordingly, it is submitted that this assessment should be amended from Amber to **Green**.

Accessibility to Services

- 4.8 This has scored a Green rating which reflects the sustainable location of the site to the north of Diss Town Centre, and the extensive range of services and facilities which it offers, all within walking or cycling distance of the site. Other facilities within the northern part of the town would also be within an easy walk. It is noted that a number of the other sites assessed in Diss also scored Green for accessibility to services, while these assessments maybe technically correct, they are considerably more remote and as such far less likely to encourage potential future occupiers to walk or cycle.
- 4.9 The accompanying Highways and Transportation Summary note quantifies the sites proximity to local services and facilities as well as public transport, which confirms its correct assessment, as **Green**.

Utilities

- 4.10 The site has only been scored an Amber for utilities. However, it is considered that there would be sufficient capacity within the existing utilities infrastructure to accommodate this proposed small scale, low density, 24 unit retirement scheme. The accompanying Utilities Overview Note at Appendix 5 contains a combined services plan and supports this position. It is noted that a number of the other smaller sites in Diss have been scored Green for utilities capacity. It is therefore considered that the assessment should be amended from Amber to **Green**.

Utilities Infrastructure

- 4.11 In accordance with the assessment methodology, there is no strategic utilities infrastructure crossing the site and the **Green** assessment score is therefore considered to be correct.

Contamination and Ground Stability

4.12 Given the historic use of the site as grazing land, it is concluded that it is extremely unlikely that there would be any contamination. As such, the sites **Green** assessment score is considered correct.

Flood Risk

4.13 The site is entirely within Flood Zone 1 according to the Environment Agency's Flood Maps for Planning, and therefore at low risk of flooding. The assessment has scored the site as Amber; however, the assessment was based on wider site area and not the more focused development site which is actually being promoted. The Environment Agency's Map for Flood Risk for Surface Water confirms that high, medium and low surface water flood risk areas are present on the eastern side of the original site and do not encroach to any significant degree into the development area. It is noted that other sites in Diss with similar small amounts of low surface water risk have been scored as Green. Extensive work has already been undertaken on this site and a Flood Risk Assessment Summary Note has been provided at Appendix 6. Accordingly, it is considered that that the score should be amended from Amber to **Green**.

Market Attractiveness

4.14 The site has been scored Green for Market Attractiveness. The demographic research which has been undertaken has confirmed that there would be demonstrable local demand for the proposed 24 retirement units in this attractive and sustainable location. Scott Residential will be one of the bidders on the consented site and is very keen to deliver it's LifeLong Homes product on the site as detailed at paragraphs 3.21 to 3.22. Accordingly, it is concluded that the assessment score of **Green** is correct.

Impact Analysis

IMPACTS ANALYSIS	
Significant Landscapes	Green
Townscapes	Amber
Biodiversity and Geodiversity	Amber
Historic Environment	Amber
Open Space and GI	Red
Transport and Roads	Green
Compatibility with Neighbouring Uses	Green

Significant Landscapes

4.15 Looking at Figure 7 above, it is clear that the majority of sites which have been put forward would have to be considered as an urban extension, with the possible exception of those around the railway station. Clearly, site GNLP0341 performs extremely well on a locational basis, being within walking distance of the town centre and all the key services and facilities available within Diss. Furthermore, as set out above, the landscape around the town is extremely sensitive to change and the potential for coalescence with Roydon and the hamlet

of Walcot Green, which needs to be avoided. Site GNLP0341 is an obvious central site which would not have any impact on the landscape setting of the town. This is supported by the Landscape Summary Note (Appendix 7) and the Landscape Design Strategy (Appendix 8) provided.

- 4.16 Accordingly, the site has been correctly scored **Green** as its modest single storey development within the town would have a neutral impact on the landscape setting of Diss.

Townscapes

- 4.17 The site has been scored Amber for Townscape. Under the assessment methodology, an Amber score suggests that development of the site would have a detrimental impact on townscapes which could be mitigated. For a site to be scored Green, development would be required to have either a neutral or positive impact, but importantly not have a detrimental impact on townscapes.

- 4.18 Looking at the Conservation Area Streetscape map, Figure 5 above it is clear that some of the surrounding streets are sensitive to change. Notably, Mount Street on the eastern side of the site contains a significant proportion of listed buildings and also there is a key view from Mount Street into the site. However, by comparison Shelfanger Road does not contain any listed buildings around the site and only a small number of buildings of townscape significance. The new site access is proposed to the north of the existing Youth and Community Centre, a building which is described in the Conservation Area Appraisal as “a major disappointment”. As such, it is considered that a new vehicular access in this location would be unlikely to have any negative impact in terms of townscape. The remainder of the site is enclosed by existing dwellings and the western side of the site is not prominent or visible in the wider townscape. Clearly, the eastern side of the entire site plays a significant role in the setting of listed buildings and the streetscape of Mount Street. However, the development proposals do not intend to add any built development on this half of the site, rather there will be improvements to the management and landscaping of the area which will have a positive impact in terms of the immediate streetscape to the east of the site. The development will also deliver the repair of wall and railings on the Mount Street frontage, a positive impact.

- 4.19 The proposal is for the provision of 24 retirement units which will be single storey, minimising any visual impact and informed by the assessments provided in Appendices 7 and 8. The individual units will be of a high quality design, appropriate to the conservation area with complementary materials. Accordingly, it is considered that overall the development of the site will either have a positive impact and it would be unreasonable to conclude there would be any detrimental impact on the townscape. As such, the site’s score should be amended from Amber to **Green**.

Biodiversity and Geodiversity

- 4.20 The site is not subject to any national, international, regional or local protection. Furthermore, as demonstrated in the accompanying Preliminary Ecological Appraisal Update (Appendix 9), it is not considered that the development of the site would have any detrimental impact on any designated site, protected species or ecological networks. The ecological assessment concludes that there is strong potential to design a development which will reduce impact to bat and reptile habitat in the areas of public open space. All the existing

Category A, B & C Trees will be retained along with the Tree Groups and the scheme has been designed around the root protection areas set out in the plan in Appendix 9. Accordingly, the assessment should be amended from Amber to **Green**.

Historic Environment

4.21 The site has been scored Amber for Historic Environment. The methodology suggests that an Amber score is appropriate where development of the site could have a detrimental impact on designated or non-designated heritage assets or the setting of designated or non-designated heritage assets, but impact could be reasonably mitigated. While the site lies within the Diss Conservation Area as set out in the townscape section above, the development will be confined to the western side of the wider site, away from the listed buildings and visually more sensitive parts of Mount Street. This approach has been informed by the technical assessments provided in Appendices 7 and 8.

4.22 One of the aspirations of the Conservation Area Appraisal is to promote tree planting and management throughout the Conservation Area. In addition, a specific enhancement proposal is also stated as:

“encourage and support greater public access to the Parish fields and repair wall and railings on Mount Street Frontage.”

4.23 Furthermore, as part of the emerging Diss & District Neighbourhood Plan, one of the three local issues identified for Diss is to:

“agree acceptable development proposals to “unlock” the Parish Fields site for public access”.

4.24 As set out above, as part of the recent Neighbourhood Plan Consultation in March 2018 there was a significant level of support for the local issues.

4.25 It clearly has to be accepted that while the site is currently subject to an important local open space designation in the South Norfolk Local Plan, there would also be significant potential benefits from a retirement led residential development. Such a single storey development with the use of high quality design and materials, would open up the remainder of the Parish Fields for public access. It would also deliver repairs to Mount Street wall and railings along with enhanced maintenance and management and additional tree planting to the remaining space, in line with specific enhancement proposals for the Conservation Area. It therefore has to be concluded that development of the site would have a positive impact rather than any neutral or detrimental impact on designated and non-designated heritage assets and as such, the assessment score should be amended from Amber to **Green**.

Open Space and Green Infrastructure (GI)

4.26 It is acknowledged that the site is currently designated as an important local open space in the South Norfolk Local Plan. It also has to be accepted that the proposed development of the western part of the site would result in some loss of the open space. However, as set out above, the proposals seek to deliver qualitative improvements to the space and ‘unlock’ it for public access. Currently, there is no public access to the space and its only function is

the contribution it makes to visual amenity, predominately in the view from Mount Street and some private views from the rear of the surrounding properties.

- 4.27 Policy DM4.4, at sub-paragraph (b) does not preclude development of such spaces. However, it requires that it needs to respect the contribution which the identified open space or open frontage makes a form of character settlement and positive contributions to the improvement of natural environmental assets where opportunities arise. It is considered that the modest development proposed, would deliver such benefits, and accord with the heritage aspirations to improve tree planting and management, encourage public access to the space and repairs to the wall and railings on the Mount Street frontage.
- 4.28 Furthermore, as noted on Inset Map 007 for Diss, that site DIS2: Land off Park Road, is allocated for open space, green space and a riverside walk and will provide approximately 4 ha of additional open space for Diss. This would be an additional area of open space which could be considered an adequate quantitative addition to offset any small quantitative loss at the Parish Fields site. There is currently a relative lack of accessible public open space in the north of the town, so 'unlocking' this site for public access would deliver a tangible benefit in this regard.
- 4.29 The assessment methodology suggests that an Amber score should be provided where development of a site would result in loss of open space which is surplus to requirements or could be replaced locally. The methodology identifies that an open space is an area of open space with public value. In this particular instance, it is concluded that the public value of the Parish Fields primarily relates to its relationship with Mount Street and historic association with The Cedars. The western side of the site has no tangible public value. Applying a qualitative and quantitative assessment would suggest that opening up the site for public access, with improved landscaping and management, would represent a significant enhancement of the space in line with local policies. As such, it has to be concluded that the site should not be categorised as Red in the assessment. The methodology suggests that a Red score is appropriate where a development would result in a loss of open space which is either not surplus to requirement or could not be replaced locally. Clearly, that is not the case in this particular instance given the modest loss of space, enhancement of the retained space (equating to 55% of the total site area) and the fact that a further four hectares has been allocated on site DIS2. It therefore has to be concluded that the assessment should be amended from Red to **Amber**.

Transport and Roads

- 4.30 The site assessment has concluded that the proposals will not have a detrimental impact on the functioning of trunk roads and/or local roads. The enclosed Highways and Transportation Summary Note also agrees that the level of traffic likely to be generated by the proposed development will be low, and that the vehicle trips generated will avoid commuter peaks. It is concluded that the local highway network would have adequate capacity to accommodate this level of development without any adverse impacts. Accordingly, the **Green** score is correct.

Compatibility with Neighbouring Uses

- 4.31 The site has been scored Green for compatibility with neighbouring uses. The low level of proposed development would not have any significant impact on neighbouring amenity being

predominantly single storey. There would not be any adverse impacts through overlooking, overbearing or overshadowing of surrounding development. Furthermore, the retirement use is unlikely to generate any significant levels of activity which might be considered harmful to neighbouring amenities and accordingly it has to be concluded that the site is correctly scored as **Green** for this impact.

SITE SUITABILITY CONCLUSIONS

This greenfield site is currently identified as an Important Local Open Space in the South Norfolk Local Plan, and its development for retirement-led residential use would clearly adversely affect the openness of the area. In addition, the site is a very important historic open space within the Conservation Area, with strong historic links to 60 Mount Street (the only detached landscape park in Norfolk) and other listed buildings; development of the site would clearly be damaging in this context too.

Whilst the precise access point(s) are unclear, it is thought likely that the highways and footpath impacts could be mitigated satisfactorily. Given the proximity to existing development, sewerage upgrades are likely to be achievable, and the small area of surface water flooding (1 in 100-year) could either be avoided or mitigated. As a site with mature trees, were any to potentially be lost, it might affect the local bat population – further work would need to be done. Clearly, given its location adjacent to the town centre, the site is well-located to shops, with employment opportunities, public transport, a GP surgery and schools close by too. The significance of the Open Space is a major constraint and the site is concluded as being unsuitable for the land availability assessment.

For the purposes of the HELAA capacity assessment this site is considered to be UNSUITABLE

Page 365

- 4.32 As set out above it is considered that the suitability conclusion should be amended to acknowledge the positive benefits of the proposals and the support in the Conservation Area Appraisal and emerging Neighbourhood Plan for opening up the site for public access. Furthermore, the western side of the site to be developed provides little public benefit as it is inaccessible open space with little amenity benefit. The proposals through enhanced management, improved landscaping and tree planting, along with repairs to the wall and railings would deliver positive benefits to the townscape in Mount Street, rather than being damaging to the sites context as suggested. It is not accepted that the significance of the open space is a major constraint. The site should be considered on a qualitative basis in line with the emerging neighbourhood plan and the presumption in favour of sustainable development. Significant weight should be afforded to public benefits of providing public access, the physical improvements to space, its function and the contribution to townscape, along with the delivery of a modest amount of retirement bungalows, in a highly sustainable and attractive environment.

Diss

Availability and Achievability Assessment

Availability and Achievability Conclusions

The proposer has indicated that the site is likely to be AVAILABLE in the following timescale:	Immediately	(timescales have not been specified by the proposer if these fields left blank)
The proposer has indicated that the site is likely to be DEVELOPABLE in the following timescale:	Up to 5 years (by April 2021)	

In terms of site viability, this site has been submitted by a landowner/promoter as viable for the form of development proposed and is assumed to be developable within the plan period in accordance with the timescales above (where given). Further area-wide work on viability typologies will be done as plan-making progresses and will inform decisions on viability.

Overall Conclusions for Site GNL0341

Based on the site suitability analysis it is considered that this site is inappropriate for the land availability assessment.

Availability and Viability

- 4.33 The site is immediately available for development, and there are no legal or viability issues which would inhibit early delivery.

Deliverability

- 4.34 Based on Scott Residential's usual build-out and sales rate of 26 dwellings per annum per site, this site could be delivered in its entirety within two years of a detailed planning permission being granted.

5. CONCLUSIONS

- 5.1 These representations have been prepared by Strutt and Parker LLP on behalf of Scott Properties, in relation to the site at Diss Lawns (the Parish Fields), Diss, site reference GNLPO341. The 2017 HELAA Assessment considered the site to be unsuitable. However, as set out in this consultation response there are significant changes to the site area and development proposed which warrant a reassessment of the site.
- 5.1 Diss is an attractive market town serving a relatively local catchment, in particular the six neighbouring parishes which make up the Neighbourhood Plan Area. It is one of four Main Towns currently identified in the Development Plan as suitable to accommodate additional housing growth. It would be a logical, sustainable location for additional housing growth to serve the particular local needs of the southern rural area of the new Greater Norwich Local Plan. The proposal will see the delivery of 24 high quality retirement bungalows, in a sustainable, central location, which would meet the demonstrable local housing needs of this particular sector of the population.
- 5.2 As set out above it is considered that the constraints analysis for Access, Utilities Capacity, and Flood Risk should be rescored as Green. It has been demonstrated that suitable highway and pedestrian access can be delivered. The site is in Flood Zone 1 and at low risk of flooding, the surface water risk being beyond the site in the retained adjoining open space. The low density retirement bungalow development of 24 bungalows can be accommodated with the existing utilities capacity without the need for any major upgrades.
- 5.3 In respect of the impact analysis this should also be amended to show scores of Green for Townscapes, Biodiversity and Geodiversity and Historic Environment, and rather than Amber. The site will deliver positive townscape improvements, in particular to Mount Street. The proposals will not have a detrimental impact on any designated or non-designated heritage assets rather a positive impact. All of the valuable existing trees and other habitat features will be retained on site and through management and additional planting will provide opportunities for biodiversity enhancements to be delivered.
- 5.4 Most importantly, the scoring for Open Space and Green Infrastructure should be amended from Red to Amber. The assessment has failed to recognise that both the Conservation Area Appraisal and emerging Diss and District Neighbourhood Plan seek to open up the site for public access. Furthermore, the western side of the site to be developed provides little public benefit as inaccessible open space with very little visual amenity benefit. The proposals through enhanced management, improved landscaping and tree planting, along with repairs to the wall and railings would deliver positive benefits to the townscape in Mount Street rather than being damaging to the sites context as suggested. It is not accepted that the significance of the open space is a major constraint, the site should be considered on a qualitative basis in line with the emerging neighbourhood plan and the presumption in favour of sustainable development. Significant weight should be afforded to public benefits of providing public access, the physical improvements to space, its function and the contribution to townscape, along with the delivery of a modest amount of retirement bungalows in a highly sustainable and attractive environment.
- 5.5 The proposals for the site are considered to be in line with the NPPF's presumption in favour of sustainable development and will provide economic, social and environmental benefits.

The sites identification as “**unsuitable**” should therefore be reassessed and amended to “**suitable**” for the reasons set out above.

- 5.6 In summary, we feel that the site represents a highly sustainable and deliverable opportunity to bring forward a high quality development that will address an identified local need and deliver tangible community benefits early in the plan period. It is the intention that pre-application advice will be sought from Officers at South Norfolk District Council early in 2019, and additional consultation will be conducted with Diss Town Council, the Neighbourhood Plan Steering Group and other local stakeholders to further shape the proposals in advance of a detailed planning application being submitted.