

REPRESENTATIONS ON THE GREATER NORWICH DRAFT LOCAL PLAN REGULATION 18 CONSULTATION, JANUARY 2020

**ON BEHALF OF: PIGEON INVESTMENT MANAGEMENT LIMITED
LAND AT WALCOT GREEN LANE, DISS**

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1. INTRODUCTION

- 1.1 Pegasus Group are instructed to submit the following representations to the Greater Norwich Draft Local Plan Reg 18 consultation (January 2020) for Pigeon Investment Management Ltd ('Pigeon') on behalf of the Thelveton Estate ('the landowners') in support of the allocation of Land at Walcot Green Lane, Diss.
- 1.2 The Land at Walcot Green Lane, Diss provides the opportunity for a high-quality landscape-led scheme for around 120 new homes including bungalows, affordable homes and up to 10 self-build plots together with extensive areas of green infrastructure and public open space.
- 1.3 The following representations address the Vision and Objectives, Policies 1, 2, 5, 6, 7.1, 7.2 and 7.4 and the identification of sites for allocation within the emerging GNLP. The accompanying Delivery Statement demonstrates that the Land at Walcot Green Lane can be sustainably delivered.

2. VISION AND OBJECTIVES

- 2.1 The Vision for Greater Norwich identifies that the GNLP will stimulate the creation of a strong, enterprising, productive and broad-based economy including through the provision of smaller scale employment sites within the market towns and villages to provide access to jobs for all. This accords with the economic objective of sustainable development which is to be welcomed. It will require that an appropriate distribution of jobs and homes is achieved through the plan.
- 2.2 The Vision aims to ensure that people of all ages will have good access to services and facilities including schools, health care, and community facilities which will reduce the need to travel. This accords with the economic, social and environmental objectives of sustainable development which is supported. It will require that housing which supports the needs of all age groups is delivered in locations which have good access to community facilities particularly with good access to sustainable transport connections.
- 2.3 The Vision seeks to ensure that a range of types, tenures and sizes of homes will have been built to respond to the needs of the area, including those of the older population and those in affordable need. Again, this accords with the social objective of sustainable development and is supported.
- 2.4 The Vision then indicates that the need to travel will have reduced including through a better alignment of the distribution of homes and facilities, an increase in home working, as well as an increase in the use of sustainable modes of transport. This will require that new housing is provided at locations where there is a shortage of workers and/or that housing is provided in locations with sustainable transport connections to major employment hubs.
- 2.5 The Vision also identifies that educational and healthcare facilities will have been expanded or new facilities provided which again accords with the social objective of sustainable development and is to be welcomed.

3. POLICY 1 – THE SUSTAINABLE GROWTH STRATEGY

- 3.1 Policy 1 sets out the proposed strategy and includes the proposed housing requirement, the proposed employment land requirement, the approach to five-year land supply and the spatial strategy. These are addressed below.
- 3.2 Policy 1 also sets out the approach to supporting infrastructure and the proposed distribution of development which are addressed in greater detail in Policies 4 and 7.1 to 7.4 respectively. These matters are responded to under those Policies rather than in response to Policy 1.

Housing Requirement

The minimum housing need

- 3.3 The foreword to the Draft Local Plan identifies a requirement for about 44,500 homes over the next 20-years. This is clarified in Policy 1 which identifies a housing requirement for 44,340 homes in response to a need for 40,550.
- 3.4 The need for 40,550 homes is identified as having been calculated using the standard method according to Table 6 and the box at the bottom of page 53.
- 3.5 The standard method provides the minimum local housing need according to the PPG (2a-004) and is calculated using the average household growth for 10 consecutive years, with an affordability uplift based on the median workplace-based house price to earnings ratio of the preceding year¹.
- 3.6 The Draft Local Plan covers the period from 1st April 2018. In order to establish the minimum local housing need for the plan period it is therefore necessary to calculate either the standard method at 2018; or to calculate the current standard method and apply this to the remainder of the plan period in addition to the number of completions which have already occurred.
- 3.7 In the case of the Greater Norwich Plan Area, the average household growth over the 10 consecutive years from 2018, namely 2018-28, was 400 in Broadland, 510 in Norwich and 704 in South Norfolk. The median workplace-based house price to earnings ratios in 2017 were 9.82, 6.93 and 8.91

¹ As confirmed in paragraph 15 of the Housing Delivery Test Measurement Rule Book

- respectively. Using these figures, the minimum local housing need over the plan period equates to 41,379 homes.
- 3.8 Alternatively, the minimum local housing need from 2019 onwards can be calculated using the average household growth over the 10 consecutive years from 2019, namely 2019-29, with the affordability ratios of 2018 applied. The average household growth was 397, 505 and 691 respectively and the median workplace-based house price to earnings ratios were 9.23, 7.03 and 8.78 respectively. These figures produce a minimum local housing need of 2,024 homes per annum which equates to 38,460 homes over the period 2019-38. The number of housing completions in 2018/19 need to be added to this figure to provide the minimum local housing need over the plan period. MHCLG Live Tables identify that there were 2,757 housing completions, as well as 260 student bedspaces and 91 other bedspaces completed in this year. Once the appropriate conversion factors as identified in the PPG (68-034) and the PPG (63-016a) are applied this would equate to 2,901 houses² completed in 2018/19. In addition to the minimum local housing need of 38,460 over the period 2019-38 this would produce a minimum local housing need for 41,361 homes over the plan period.
- 3.9 Once the median house price to earnings ratio for 2019 and the number of housing and bedspace completions in 2019/20 are available, it will be possible to provide yet another calculation of the minimum local housing need based on the completions in the period 2018-20 and the minimum local housing need over the period 2020-38. However, given the consistency of the preceding figures it would be expected that this would again be broadly consistent.
- 3.10 In either case, it is apparent that the standard method has been miscalculated within the Draft Local Plan as it is below the minimum local housing need of either **41,379** or **41,361**. Policy 1 and all other references to a need for 40,550 are therefore not justified nor are they consistent with national policy.

² Calculated using the average number of students per household of 2.85 in Norwich and applying this to the 260 student bedspaces which equates to 91 houses; and using the average number of adults per household of 1.85 in Broadland and applying this to the 8 older persons bedspaces which equates to 4 houses; and using the average number of adults per household of 1.72 in Norwich and applying this to be 83 older persons bedspaces which equates to 48 houses.

- 3.11 Furthermore, the Government has identified that it intends to review the standard method by September 2020. As the Local Plan is not intended to be submitted for examination until June 2021, it is likely that the Local Plan will need to respond to the new standard method, whatever that may be.

Exceeding the minimum housing need

- 3.12 The standard method also only provides the minimum local housing need, and the PPG (2a-010) identifies that this should be exceeded including in situations where there is a growth strategy or where strategic infrastructure improvements may drive an increase in housing need or where previous assessments of need are significantly greater than the standard method. All three of these situations arise in Greater Norwich.

The City Deal

- 3.13 Paragraph 13 of the Draft Local Plan identifies that the Greater Norwich City Deal requirements will be met through the Draft Local Plan. As the Greater Norwich City Deal forms a growth strategy which has been agreed with Government, the Local Plan is required to meet the requirements of the City Deal as this forms part of national policy as set out in paragraph 6 of the NPPF.
- 3.14 The City Deal identifies that strategic infrastructure is needed including to deliver a step change in housing delivery. It sets a target for an average of 3,000 homes per annum in the period 2014-19 and for 37,000 homes to be delivered in the period 2008-26.
- 3.15 MHCLG Live Tables identify that only 10,715 houses were built in the period 2014-19 in addition to the equivalent of 581 homes provided as student and older persons bedspaces. This provides a total of 11,296 or an average of only 2,259 homes per annum. It is therefore apparent that the short-term target of the City Deal has not been met and that accordingly this shortfall of 3,704 homes should be addressed as soon as possible to achieve the objectives of the City Deal. No such short-term uplift to remedy this shortfall is made within the Draft Local Plan contrary to the requirements of national policy in the form of the City Deal.
- 3.16 In the period 2008-19, the MHCLG Live Tables identify an equivalent of 19,416 housing completions, which means that in order to provide 37,000 homes in the period 2008-26 it will be necessary to deliver the remaining 17,584 in the period

2019-26 or an average of 2,512 per annum. However, the housing need identified in emerging Policy 1 of 40,550 homes only provides for an average of 2,028 homes per annum. The housing need of the Draft Local Plan therefore again does not provide a sufficient number of homes to meet the housing needs identified in the City Deal.

- 3.17 It is therefore evident that the Draft Local Plan does not meet any of the targets of the City Deal and that it is accordingly not effective, not justified, not positively prepared and inconsistent with national policy.

Previous assessments of need

- 3.18 The SHMA for Central Norfolk identifies that there was a need to deliver 44,714 homes from 2015-36 to accord with the City Deal. In the period 2015-18, the equivalent of 6,680 homes were delivered and so there is a residual need for 38,034 homes from 2018-36, or 2,113 per annum.

- 3.19 Assuming that this need remained constant across the period 2036-38, there would be a need for 42,260 homes to accord with the City Deal based on the latest assessment of housing need. The Local Plan does not therefore provide a sufficient number of homes to meet the latest assessment of need or to accord with the City Deal.

The housing need of students

- 3.20 The standard method is informed by the 2014-based household projections which assume that the five-year migration trends which were experienced in the period 2009-14 will be maintained. The Higher Education Statistics Authority (HESA) identified that University of East Anglia (UEA) had 16,640 students and the Norwich University of the Arts had 1,485 students in 2009 providing a total of 18,125, but that this had increased to 18,140 by 2014 with 16,265 at UEA and 1,875 at the University of Arts. The 2014-based projections which inform the standard method therefore assumes that the student population will increase by 15 people over five years or 3 per annum.

- 3.21 Paragraph 45 of the Draft Local Plan however indicates that the Universities in Norwich are expected to expand. In particular, the University of East Anglia (UEA) has announced plans to increase its students from 15,000 to 18,000 in the next decade, an increase of 300 students per annum.

- 3.22 The increased migration of 297 students per annum³, even assuming that the student population of the University of the Arts remains constant, are not taken into account in the projections.
- 3.23 These additional students at UEA will clearly have an impact on the housing need in Greater Norwich which is not taken into account within the standard method. Either these will generate a need for an additional 2,970 bedspaces which is equivalent to 1,042 houses or if these students are accommodated in the housing stock it will be necessary to deliver an additional 1,042 homes to accommodate them. It will be necessary to deliver such accommodation to meet the objectively assessed needs and to accord with the Vision of the GNLP.
- 3.24 Once the needs of these additional students are taken into account this would increase the minimum local housing need from either 41,379 or 41,361 to either **42,421** or **42,403** homes over the plan period. This broadly accords with the 42,260 homes necessary to accord with the City Deal.

The needs of those in institutional accommodation

- 3.25 The SHMA for Central Norfolk identifies a need for 3,909 people aged 75 or over to be accommodated in residential institutions over the period 2015-36. The 2014 based institutional population projections identify an increase of 2,060 such people within the GNLP area over the period 2015-38 comprising 1,088 in Broadland, 291 in Norwich and 681 in South Norfolk.
- 3.26 In the period 2015-18, a total of 234 bedspaces in older persons communal establishments were built, including 7 in Broadland, 225 in Norwich and 2 in South Norfolk. This leaves a residual need for 1,826 bedspaces in the period 2018-36, comprising 1,081 in Broadland, 57 in Norwich and 679 in South Norfolk.
- 3.27 The household projections which inform both the SHMA and the standard method do not include this population and the SHMA correctly recognises that in the absence of 1,826 bedspaces in communal establishments the population who would have occupied these will remain in the dwelling stock rather than releasing them as assumed in the projections.

³ = 300 students per annum identified in paragraph 3.21 – 3 students per annum identified in paragraph 3.20.

- 3.28 It is therefore apparent that there is a need for 1,826 bedspaces in communal establishments in addition to the standard method and that in the absence of such provision the housing requirement will need to increase as fewer dwellings will be released to the market. The number of dwellings that would not be released in the absence of such residential institutions is 987 using the calculation identified in the PPG (63-016a) comprising 584 in Broadland, 33 in Norwich and 369 in South Norfolk.
- 3.29 It will therefore either be necessary to make provision for the 1,826 bedspaces or increase the housing requirement by 987 homes to meet the objectively assessed needs within the GNLP and to accord with the Vision of the GNLP. This would result in a need for either 43,408 or 43,390 homes or to 42,421 or 42,403 homes and 1,826 bedspaces.

The housing requirement

- 3.30 The Delivery Statement on page 37 indicates that the Draft Local Plan provides a sufficient supply of housing sites to exceed the identified housing need of 40,550 homes by 9%. However, as identified above, there is actually a need for at least 42,400 homes to accord with the City Deal, meet the minimum local housing need and to accommodate the growth plans of UEA as well as a need for an additional 1,800 bedspaces in communal establishments.
- 3.31 In order to provide sufficient flexibility to ensure that these minimum needs will be delivered, taking account of the non-delivery of sites, it has been found by numerous Inspectors that it is appropriate to set the housing requirement above the minimum housing need⁴ as the Draft Local Plan seeks to do.
- 3.32 In Greater Norwich, the housing trajectory of the Joint Core Strategy identified that there would be 23,637 housing completions in the period 2008-19. However, only 18,835 homes have been delivered which demonstrates that at least historically, the trajectory of Greater Norwich overestimates the developable supply by circa **25%**. Assuming that the current trajectory is equally as accurate, it would be appropriate to set a housing requirement 25% in excess of the minimum need for circa 42,400 homes. This would produce a housing requirement for circa **53,000 homes**. This is illustrative that there is a need for a significant contingency allowance in Greater Norwich to ensure that

⁴ Including in Aylesbury Vale and Gloucester, Cheltenham and Tewkesbury

needs are actually met. It is therefore recommended that the proposed contingency of 9% is retained as a minimum but this should be significantly greater, which in addition to the minimum housing need for circa 42,400 homes produce a housing requirement for at least 46,216 homes.

Contingency to respond to changes

- 3.33 The Government has identified an intention to review the standard method in September 2020 and this will be required to be responded to in the Greater Norwich Local Plan to meet the minimum local housing needs at the point of submission as required by the PPG (2a-008). This proposed review of the standard method means that the minimum housing needs may change from the 42,400 identified above. It may be that the minimum housing needs increase significantly and accordingly a sufficient developable supply (including the required contingency set out above) should be planned for to ensure that the emerging GNLP will be able to respond to the identified minimum needs at the point of submission as required by the PPG (2a-008).
- 3.34 Whilst it is not possible to identify the need which will arise from this review at present, it is considered that a sufficient developable supply (including the required contingency set out above) should be planned for to significantly exceed the identified need for at least 42,400 homes and provide confidence that the minimum needs arising from the review will be able to be accommodated.

Employment Land Requirement

- 3.35 As set out in the GNLP, there is no quantitative need for additional employment sites. Nevertheless, the GNLP allocates an additional 40ha providing a total of 360ha of employment land allocations to meet the underlying demand and provide choice to the market.
- 3.36 Whilst these allocations will assist the economic growth of the area and represent positive planning, if a significant proportion of these are actually developed and occupied, they will be dependent upon greater numbers of in-commuters from outside of the plan area. Accordingly, an appropriate monitoring framework should be put in place to ensure that a sufficient number of homes are provided to accommodate the workforce to avoid the resultant

environmental harms of a greater dependency on long-distance commuting flows.

- 3.37 If the monitoring framework indicates that a greater number of jobs have been accommodated than the growth in the resident workforce such that the economy of the area becomes more dependent upon unsustainable long-distance in-commuting flows, this should trigger an immediate review of the GNLP alongside a policy response with residential planning applications being considered more favourably until such time as the GNLP review is adopted to address the imbalance.

The approach to five-year land supply

- 3.38 Policy 1 proposes that the five-year land supply will be assessed across the plan area and that enough allocations are provided to demonstrate a five-year land supply at adoption. However, there is no evidence that this is the case as the GNLP is not supported by a housing trajectory contrary to paragraph 73 of the NPPF. Pegasus Group reserve the right to respond on this matter when the necessary evidence is made available.

Spatial Strategy

- 3.39 The Table at Policy 1 details the distribution of housing supply across the settlement hierarchy, including proposed new allocations as follows;
- Norwich urban area - 30,560 dwellings – approximately 70% of supply
 - Main towns – 6,342 dwellings – approximately 14% of supply
 - Key Service Centres – 3,417 dwellings – approximately 8% of supply
 - Village clusters – 4,024 dwellings – approximately 9% of supply
- 3.40 Policies 7.1 to 7.5 provide further detail on the distribution of sites and the composition of existing and proposed allocations with regard to their size and brown or green field status.
- 3.41 Our clients raise concern over the proposed spatial strategy of the emerging GNLP owing to its over reliance on housing delivery in the Norwich urban area and the proposed discrepancy in terms of settlement hierarchy between the

- quantum of housing allocated to Main Towns, Key Service Centres and Village Clusters.
- 3.42 While the Norwich urban area is a sustainable location for growth, reliance on this area for the delivery of approximately 70% of the housing growth of the GNLP up to 2038 places a requirement on existing infrastructure to accommodate an additional 30,560 dwellings in the plan period, it also requires an annual delivery rate within the area of 1,698 dwellings per annum over each of the next 18 years. This requires that the level of development in Norwich urban area alone is broadly consistent with that which has been achieved across the entire GNLP plan area since 2008. This does not appear to be realistic. If the necessary boost to housing supply is to be achieved this will require a greater range and choice of sites across all of the sustainable settlements within the plan area.
- 3.43 Moreover, reference to Policy 7.1 demonstrates that delivery within the Norwich Urban Area is predicated on two substantial brownfield regeneration areas, the Northern City Regeneration Area and the East Norwich Strategic Regeneration Area and several urban extensions of over 1,000 dwellings each.
- 3.44 Brownfield regeneration is costly and time consuming and often involves the bringing together of multiple delivery partners to achieve. The likelihood of the totality of development proposed through regeneration delivering in the plan period is therefore slim.
- 3.45 New strategic urban extensions can also be timely to deliver with the need for new strategic infrastructure in terms of highways and drainage to be delivered in advance of new homes.
- 3.46 The Councils have not produced evidence to substantiate the delivery trajectory of the brownfield regeneration sites or the urban extensions in the Norwich Urban Area. We reserve the right to comment further on this matter at the Regulation 19 consultation stage. Delay in delivery at either source of supply could prejudice the delivery of the housing requirement of the GNLP and therefore go to the soundness of the plan.
- 3.47 Additional certainty over the delivery of the housing requirement could be achieved by changing the emphasis of the spatial strategy by allocating more housing to the Main Towns, including Diss, and the Key Service Centres with an

- associated reduction in the percentage to be delivered in Norwich urban area and the Village Clusters.
- 3.48 Diss in particular is identified in the Reg 18 GNLP as having capacity for additional employment development. Diss is a net importer of workers with 2011 Census data showing only 4,939 economically active people living in the town compared to the 5,623 people working there. In order to balance homes and jobs and provide for sustainable development it is necessary for more houses to come forward at Diss, especially given the re-allocation of 10.8ha of employment land at the Town in the Reg 18 GNLP.
- 3.49 Additionally, we have concerns over the fact that more dwellings are proposed in the spatial strategy across Village Clusters than are allocated at Key Service Centres, including a minimum of 1,200 dwellings through a South Norfolk Village Clusters Housing Site Allocations Development Plan Document.
- 3.50 Without certainty over the supply of land to deliver such a quantum of development in South Norfolk Village Clusters the soundness of the spatial strategy is questionable. As a percentage of the overall new housing allocations in the Reg 18 GNLP the current spatial strategy delegates approximately 15% to a document outside of its control (1200/7,840). This is not considered to be a reasonable approach and prejudices the delivery of the emerging GNLP by 2038.
- 3.51 A Settlement Hierarchy approach to the distribution of development would look to allocate a higher percentage of housing to more sustainable locations with smaller amounts being allocated to lower order settlements in recognition that small developments at villages can help maintain service provision, provide vitality and help address local market and affordable housing needs.
- 3.52 In failing to provide an increased number of dwellings at Main Towns and Key Service Centres the Councils are also missing the opportunities presented by Pigeon to provide new community facilities that can support existing and proposed new development in sustainable locations for the plan period and beyond.
- 3.53 The preceding representations on the Spatial Strategy are all set in the context that the identified housing need does not even accord with the minimum set by national policy and does not take account of the needs of specific groups. It is

therefore evident that the quantitative elements of the Spatial Strategy will need to be revised to ensure that housing needs can be met across the GNLPA area. This should be achieved through directing more growth to the Main Towns and Key Service Centres to counterbalance the disproportionate levels of growth proposed within the Norwich urban area and Village Clusters.

4. POLICY 2 – SUSTAINABLE COMMUNITIES

- 4.1 While we broadly support the overall aims and objectives of the GNLP to facilitate the growth and delivery of sustainable communities the following representations are made in response to Policy 2 and its associated reasoned justification.

Criteria 3

- 4.2 This Criteria requires new development to;

"Contribute to multi-functional green infrastructure links, including through landscaping, to make best use of site characteristics and integrate into the surroundings;"

- 4.3 This is supported as it provides for the environmental objective of sustainable development. Pigeon's site proposals at Diss includes new green infrastructure linkages thereby supporting the environmental objectives of Criteria 3. These linkages will provide for biodiversity enhancement and new wildlife corridors as well as providing new footpath connectivity integrating with the existing public right of way network for the benefit of both existing and new residents.

Criteria 4

- 4.4 This Criteria requires new development to;

"Make efficient use of land with densities dependent on site characteristics, with higher densities and car free housing in the most sustainably accessible locations in Norwich. Indicative minimum densities are 25 dwellings per hectare across the plan area and 40 in Norwich."

- 4.5 The density of residential development at any site is dependent on other community infrastructure or site-specific requirements that may arise as a result of emerging GNLP planning policy. It may transpire that a site promoted to the plan can provide educational or health facilities in association with residential development. The need for highway infrastructure and sustainable drainage features to be provided at a site also should be taken into consideration. To that end the policy should be amended to state that;

"...the indicative minimum net density of the residential element of a site allocation should be 25 dwellings per hectare."

- 4.6 The Policy identifies that these minimum density standards are indicative. This is supported as it allows for flexibility to ensure that each parcel of land is used effectively, taking account of the type of development proposed, the site context and appropriate design characteristics.

Criteria 10

- 4.7 This Criteria contains the following bullet point;
- “All new development will provide a 20% reduction against Part L of the 2013 Building Regulations (amended 2016);”*
- 4.8 The Planning Practice Guidance states that;
- “The National Planning Policy Framework expects local planning authorities when setting any local requirement for a building’s sustainability to do so in a way consistent with the government’s zero carbon buildings policy and adopt nationally described standards. Local requirements should form part of a Local Plan following engagement with appropriate partners, and will need to be based on robust and credible evidence and pay careful attention to viability.”* PPG Climate Change – Paragraph: 009 Reference ID: 6-009-20150327 Last revised 27th March 2015
- 4.9 PPG Paragraph: 012 Reference ID: 6-012-20190315, last revised 15th March 2019, states that Local Plans can set energy efficiency standards that exceed the energy efficiency requirements of the Building Regs, it also states that such policies should not be used to set conditions on planning permissions with requirements above the equivalent of the energy requirement of Level 4 of the code for Sustainable Homes – which is identified as approximately 20% above current Building Regs across the build mix. The PPG also requires such policy requirements to be viable.
- 4.10 The Code for Sustainable Homes was withdrawn in 2015 and replaced by technical housing standards. The GNLP Reg 18 has chosen to continue to pursue the ‘20% above Building Regs’ approach at criteria 10 of Policy 2.
- 4.11 The Alternative approaches section states that this target is a ‘challenging but achievable requirement’ and that to go beyond 20% would be unviable.

- 4.12 What is not clear however is the Councils' evidence to require energy savings of 'at least 20%' above Building Regs when the PPG states 'approximately 20% across the build mix'.
- 4.13 It is not clear either whether this policy requirement has been appraised across a range of site typologies in the viability appraisal and whether it has been tested in conjunction with the other policy requirements of the plan, including those of emerging Policy H5 which seeks:
- i. 33% affordable housing, (except in Norwich City Centre);
 - ii. all new housing development to meet the Governments Nationally Described Space Standards; and
 - iii. 20% of major housing developments to provide 'at least 20% of homes to the Building Regulation M4(2)(1) standard or any successor'.
- 4.14 Whilst the objectives behind these are supported, taken together these emerging policy requirements of the plan could prejudice the delivery of some sites within the emerging plan.

Master planning

- 4.15 Community engagement prior to submitting an application is supported. However, Policy 2 identifies master planning using a recognised community engagement process for schemes of more than 200 dwellings will be encouraged. It is not clear what is meant by such a master planning process and clarity would be welcomed.
- 4.16 It is considered likely that such a master planning process would exceed the requirements of each of the joint authorities existing adopted Statements of Community Involvement and also goes beyond the requirements of paragraphs 39 to 41 of the NPPF and the PPG (20-010).

Furthermore, there is no guarantee that the masterplan outcomes of such a community engagement process will be considered appropriate or acceptable by the local authority as there is no mechanism for validating the outcomes of the process pre-submission. This could result in difficulties for all parties at the application stage should masterplan amendments be required as a result of statutory and internal local authority consultations post submission.

5. POLICY 5 – HOMES

- 5.1 Policy 5 identifies that proposals should address the need for homes for all sectors of the community having regard to the latest evidence which is to be supported.

Space Standards

- 5.2 The Policy requires all housing development to meet the Government's Nationally Described Space Standard for internal space (NDSS)⁵.
- 5.3 NDSS are not currently a mandatory requirement of Building Regulations and therefore should a Council wish to introduce them they are required to accord with the tests of NPPF 2019 paragraph 127f and Footnote 46 which requires the use of the NDSS to be 'justified'.
- 5.4 The Councils also need to demonstrate that the costs associated with implementing the NDSS have been subject to whole plan viability appraisal as required by planning practice guidance⁶.
- 5.5 The Council's NDSS Study (August 2019) is attached at Appendix B of the Interim Viability Appraisal (2019). The Councils have not identified harm that may be arising to residents as a result of dwellings not being built to the NDSS. Nor is there any evidence that houses not built to the NDSS are not selling as well as those that are, or that such homes are considered inappropriate by purchasers.
- 5.6 If the Government considered it appropriate to make the NDSS mandatory, as proposed by draft Policy 5, then this could quickly and easily be introduced through Building Regulation legislation rather than through the Development Plan process.
- 5.7 Introducing the NDSS in the GNLP will have an impact on the cost of construction of dwellings and therefore on their affordability to consumers, as well as on the density of development that can be achieved at development sites, thereby

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf

⁶ NPPG Housing Optional Space Standards: Paragraph: 003 Reference ID: 56-003-20150327 Revision date: 27 03 2015.

affecting the efficient use of land. It will also have a knock-on effect on the viability of the GNLP which may translate into impact on the deliverability of dwellings and therefore on the delivery of the emerging plan.

Accessible and Specialist Housing

- 5.8 The Policy then proceeds to support the delivery of accessible and specialist housing providing they have good access to local services which is welcomed.
- 5.9 However, as identified in response to Policy 1 there is a need for 1,826 bedspaces in residential institutions for older people across the plan area which would be best addressed, at least in part, through the identification of specific allocations to meet this need. In the absence of such allocations, the GNLP cannot demonstrate and more importantly may not meet the objectively assessed needs of this population contrary to paragraphs 35a and 61 of the NPPF.
- 5.10 There is a need for 1,081 bedspaces in Broadland, 57 in Norwich and 679 in South Norfolk over the plan period. In 2018/19, 8 were built in Broadland leaving a residual need for 1,072 and 83 were built in Norwich meaning that there is no residual need in this LPA. In order to ensure that these needs are addressed it would therefore be appropriate to allocate sites in both Broadland and South Norfolk to meet these needs.
- 5.11 In addition to the need for residential institutions (including care homes and nursing homes) there will also be a need for independent living units including those which offer communal facilities and/or a level of care (such as sheltered housing or extra care) to accommodate older households.
- 5.12 Norfolk County Council has assessed the need for such accommodation in Living Well, July 2018 and identify a need for 3,376 such homes in Broadland, 122 in Norwich and 3,257 in South Norfolk. Owing to the scale of this need, it would again be appropriate to identify specific allocations to ensure that the needs of communities are addressed.
- 5.13 Any such allocations for residential institutions or independent living units should be primarily within Broadland and South Norfolk where the need arises on sites which have good access to local facilities and to public transport infrastructure.
- 5.14 The Policy requires proposals for major housing development to provide;

"..at least 20% of homes to the Building Regulation M4(2)(1) standard or any successor."

- 5.15 This implies that any development of 10 or more dwellings will need to provide upwards of two dwellings that meet the accessibility standard to enable people to stay in their homes longer, however there is no evidence provided that such a high percentage of adaptable dwellings will be required over the life time of the plan. While it is long recognised that many affordable homes are built to such a standard, this is an additional policy requirement that developers are being requested to meet which will have a knock on impact on the cost of new homes and therefore their accessibility in terms of cost to those seeking to enter the housing market.
- 5.16 It is considered that the requirement for the delivery of adaptable and specialist accommodation should be specific to individual allocations which will ensure that the needs can be met across the GNLP area and that these will be met at appropriate locations in close proximity to services and facilities.

Self/Custom-Build

- 5.17 There does not appear to have been any assessment of the need for self/custom-build housing to justify the requirement in Policy 5 for 5% self/custom-build on sites of 40 or more homes.
- 5.18 The Councils have not published evidence to justify their policy requirement to self-build plots either with regard to the percentage of plots sought or the size of site from which they are to be sought. As written sites of 40 or more homes will be required to provide at least two plots as self/custom build.
- 5.19 Pigeon are supportive of providing self-build plots and their proposals at Diss allow for such development. Indeed, the Diss site allows for a discrete area of 10 self-build plots allowing for mutual support amongst the self-build community and bespoke design solutions to come forward.
- 5.20 Notwithstanding the above, concern is expressed that the policy as written is not adequately evidenced. The self-build register of each Council is not publicly available to validate the policy approach being pursued. Generally, many of those seeking to build their own homes wish to do so on plots in rural areas or villages, not in urban locations, therefore there is no certainty over the delivery of the policy approach being proposed.

5.21 Therefore, it is considered that the requirement for the delivery of self-build plots should be specific to individual allocations to ensure that the needs will be met across the GNLP area and that these will be met at locations and at scales which are likely to be attractive to the self-build market. As such, provision for approximately 10 self-build plots is made as part of the proposal on land to the east of Walcot Green Lane. In addition, the policy could be expanded to allow self-build schemes to come forward where they are well related to settlement boundaries and have access to a range of services and facilities.

6. POLICY 6 – ECONOMY

- 6.1 Policy 6 proposes a number of employment allocations. However, these allocations do not necessarily reflect the balance of the workforce with the existing jobs, and therefore rely upon an increase in commuting flows between settlements.
- 6.2 By way of example, as identified above, Diss is a significant net importer of workers such that it relies upon people commuting into the settlement to work. In order to minimise the need to travel it would therefore be appropriate to deliver additional housing to provide the opportunity for those working in the town to live in the town. In the absence of sufficient provision, the need to travel will be promoted. This would appear to be directly contrary to paragraph 103 of the NPPF as it will increase the need to travel to Diss on a daily basis.
- 6.3 It is therefore considered that in settlements which experience such imbalances, appropriate residential allocations should be identified to accord with the NPPF and limit the need to travel.

7. POLICIES 7.1-7.5 – THE SPATIAL STRATEGY

Policy 7.1 – Norwich Urban Area including the Fringe Parishes

- 7.1 Policy 7.1 details existing commitments and proposed allocations for the City Centre, East Norwich and elsewhere in the urban area including fringe parishes for housing and employment purposes. It also provides policies for retail, main town centre uses and leisure development.
- 7.2 A total of 30,560 new homes are proposed in the Norwich urban area for the plan period up to 2038, of which 26,165 homes (approximately 86%) are stated as comprising existing commitments. As currently proposed the Norwich urban area will provide 68.9% (approximately 70%) of housing land supply for the GNLP.
- 7.3 Closer examination of this source of supply demonstrates a reliance on brownfield regeneration sites and large urban extensions. These sources of supply are explored further below.
- 7.4 The Northern City Centre strategic regeneration area is dependent on the delivery of Anglia Square, a high density housing-led mixed-use redevelopment which was ‘called-in’ by the Secretary of State for the purpose of decision making on 21st March 2019 and is the subject of a public inquiry which commenced on 28th January 2020⁷. The appeal Inspector will make recommendations to the Secretary of State however the site should not be relied upon for the delivery of a large quantum of homes until the Secretary of State allows the appeal. To that end the emerging GNLP should not place an over reliance on the allocation and should look to other sources of supply to meet its housing requirements.
- 7.5 The East Norwich area is also identified as a strategic regeneration area on the GNLP Key Diagram with named brownfield sites including;
- Yare at Carrow Works
 - the Deal Ground
 - the Utilities Site

⁷ https://www.norwich.gov.uk/info/20017/planning_applications/2491/anglia_square_planning_application_-_public_inquiry

- land in front of ATB Laurence Scott

- 7.6 It is of particular note that outline planning permission was granted at the Deal Ground in 2013 but no applications for the approval of reserved matters or for the discharge of conditions have since been submitted in the subsequent 7 years. This is indicative of the length of time that it can take to resolve issues on large brownfield sites prior to delivery.
- 7.7 The GNLP area is stated as having the long-term potential to deliver a new urban quarter and no certainty is provided that the named sites can deliver in the plan period up to 2038. Indeed, a master planned approach through a Supplementary Planning Document is proposed to co-ordinate the delivery of the area, including a local energy network and sustainable transport options.
- 7.8 The GNLP is therefore correct to suggest that East Norwich represents a long term growth option as the brownfield regeneration of historic industrial and former manufacturing areas takes many years of concerted effort, often with the intervention of the public sector to address funding gaps owing to constraints such as contamination, heritage and flood risk.
- 7.9 Much of the East Norwich Strategic Growth Area is located adjacent to existing water course including the Rivers Wensum and Yare therefore flood risk will represent an issue with regard to delivery.
- 7.10 Moreover the Reg 18 document highlights the uncertainty over the Britvic/Unilever Carrow Works site, this is the largest regeneration site shown in the Key Diagram (Map 9) for the east Norwich Strategic Growth Area, therefore assumptions made over the quantum of housing to be delivered from this brownfield source should be questioned until there is further clarity over the availability of the site. To that end the emerging GNLP should not place an over reliance on the new East Norwich allocation (1,200 homes) and should look to other sources of supply to meet its housing requirements.
- 7.11 Policy 7.1 also places emphasis on the delivery of large urban extensions (sites of over 1,000 dwellings) 20,765 of which are stated as being existing commitments and 2,815 of which are proposed as new allocations. Indeed, the proposed capacity from 'elsewhere within the Norwich urban area' represents 78% of the housing supply in the total Norwich Urban Area.

- 7.12 Urban extensions often require the delivery of substantial highway and drainage infrastructure before the delivery of new homes can commence. The delivery of 19,944 new homes on urban extensions appears overly optimistic. This is especially the case given the previous over-optimism which is evident in the trajectories within the GNLP area which have overestimated supply by circa 25%. It is also considered to be over-optimistic given that this includes 3,000 homes on a single site at North Rackheath which is not expected to achieve its first completion until 2024/25 according to the Annual Monitoring Report leaving only 14 years of the plan period to deliver at an average rate of 214 dwellings per annum which has been achieved on very few sites nationally.
- 7.13 The last paragraph of Policy 7.1 states that a large contingency site has been identified at Costessey to be bought forward if delivery of housing in the GNLP does not meet local plan targets. Such an approach is not considered to be reasonable given the existing over reliance on large strategic sites in the Norwich Urban Area to deliver homes in the plan period.
- 7.14 To conclude, the over reliance on the Norwich Urban Area to deliver 30,560 new homes in the plan period is considered to be an overly optimistic strategy given the reliance on large brownfield regeneration sites that are as yet unconsented plus a heavy associated reliance on large urban extensions, plus the growth triangle, to deliver the quantum of homes proposed in the GNLP by 2038.
- 7.15 An alternative strategy proposed by Pigeon, which seeks a greater percentage of development allocated to smaller, eminently deliverable sites at Main Towns and Key Service Centres, will not only help provide certainty to the delivery of the plan but provide for sustainable growth at locations with services and facilities, will assist the GNLP in evidencing a five-year housing land supply, provide a range and choice of sites to support delivery, and will provide new community facilities including land for education and healthcare purposes.
- 7.16 Our client reserves the right to comment further at Regulation 19 once housing trajectories are published, on the deliverability of sites and the associated soundness of the plan.

Policy 7.2 - Main Towns

- 7.17 Policy 7.2 sets out the level of growth to be delivered in the plan period for the Main Towns of Aylsham, Diss, Harleston, Long Stratton and Wymondham.

- Collectively these towns will provide 6,342 homes, approximately 14% of housing growth for the plan period.
- 7.18 Paragraph 308 of the GNLP states that these towns play *'a vital role on the rural economy'* as they *'provide employment opportunities and services for rural hinterlands'*. It goes on to say that the settlements are *'the engines of rural growth'*.
- 7.19 Accordingly, it is necessary to make appropriate provision at these highly sustainable settlements to ensure that the rural economy is supported and that local housing needs are addressed including at Diss.
- 7.20 The GNLP states that Diss is *'strategically located'* with the *'widest range of shops and services of the main towns'* plus a *'broad range of employment opportunities'*. It is identified at paragraph 317 as having *'potential for economic growth as an enhanced centre serving a large rural hinterland in South Norfolk and northern Suffolk'*. Paragraph 322 identifies Diss as having *'potential for jobs growth on existing undeveloped allocated employment land particularly for manufacturing, including high value activities.'* (emphasis added)
- 7.21 Given the above statements about Diss taken from the introduction to Policy 7.2 it is concerning that it ranks third out of the five main towns for proposed housing delivery in the plan period with 743 new homes proposed, 343 from existing commitments and 400 from new allocations, representing just 12% of new housing development to come forward at main towns.
- 7.22 It would seem appropriate given the status Diss is given in the GNLP that it would provide a greater percentage of new housing growth especially as it is the only main town that is a net importer of workers as described in the spatial strategy representation above.
- 7.23 It is of particular importance if the plan is to balance the delivery of homes to jobs that Diss is allocated more housing growth to address the current shortfall of workers. Additional housing over and above that required to address the current shortfall will be required to provide for workers at new employment development coming forward on the allocated 10.8ha site at Diss. There are therefore strong arguments to increase the level of new housing proposed at this main town.

- 7.24 Proposed housing allocations at Diss, as set out in the draft GNLP, include a new green field site to the north of the town, and a large brownfield site to the east of the town immediately adjacent to the train station.
- 7.25 Concern is raised over the deliverability of the brownfield site (GNLP0102 Frontier Agriculture Ltd) as this is an existing employment site in active use by the UK's leading crop production and grain marketing business. The site provides one of the company's nationwide network of grain storage and processing facilities each of which are located in strategically placed locations to provide optimum accessibility for producers across the local area. The loss of the facility from Diss would be disadvantageous to the local agricultural sector.
- 7.26 The delivery of new residential development at the site would also be almost entirely surrounded by employment land meaning that it would be largely disconnected from neighbouring residential uses which provide for natural surveillance and reduce the potential for crime. There may be issues with residential amenity given the presence of businesses immediately on virtually all sides, each of which is likely to be served by heavy goods vehicles potentially operating throughout the day and night, with the potential for noise and air quality issues.
- 7.27 Moreover, the Diss Sites Evidence Base document states that the use of the site for residential purposes is not supported by the local community who consider the allocation of the site to be prejudicial to the delivery of the Diss Neighbourhood Plan. (A previous outline application for demolition of existing buildings at the site and the erection of 90 dwellings was withdrawn (2015/2816) on 17th October 2016.)
- 7.28 The Stage 6 detailed site assessment states that no additional documents have been submitted to support the site.
- 7.29 Therefore, in terms of residential amenity and delivery, this residential allocation is considered to be inappropriate when other deliverable alternatives are available such as land at Walcot Green Lane (GLNP1044) which will provide new green infrastructure linkages including circular footpath routes, market and affordable homes and self-build plots plus new highway improvements to Walcot Green Lane, all of which will provide benefits to existing and new residents alike.

- 7.30 The land at Walcot Green Lane is deliverable and additional technical work that has been carried out in support of promoting the site evidences that highway constraints identified by the Council's evidence base can be overcome through the provision of a high quality pedestrian and cycle link via Orchard Croft to the south. The site is not otherwise constrained and can contribute to the authorities five-year housing land supply.
- 7.31 In conclusion Diss should be providing additional housing through allocations in the GNLP in order to balance jobs with homes at the Main Towns. The quantum of housing currently proposed in the GNLP is inadequate to achieve a jobs/homes balance and additional employment land is proposed through the GNLP. The argument for additional and alternative housing allocations at Diss is compelling, especially given the proposed brownfield allocation at the town which is not appropriate in terms of place making or delivery. The land at Walcot Green (GNLP1044) is an appropriate alternative which should be allocated to help address the emerging unmet housing needs at Diss.

Policy 7.4 – Village Clusters

- 7.32 The GNLP proposes a disproportionately high level of growth at the Village Clusters, a significant proportion of which are on as yet unknown sites to be identified in the South Norfolk Village Clusters Housing Site Allocations Plan.
- 7.33 Village Clusters are by definition less sustainable locations for growth and accordingly it would be expected that development would be restricted to that necessary to support rural or local needs. However, the GNLP seeks to direct more development to such settlements than to Key Service Centres which have a relatively good range of services, access to public transport and employment opportunities and play a vital role in serving the rural areas according to paragraph 333 of the GNLP. Similarly, paragraph 308 identifies that the Main Towns serve the wider hinterlands including these Village Clusters. This would suggest that the needs of rural areas would be more sustainably provided through development at the Key Service Centres and Main Towns contrary to the strategy proposed in the GNLP. The GNLP strategy is even less sustainable, given that development at the Key Service Centres and Main Towns provides the opportunity to enhance community facilities which serve the rural areas.
- 7.34 Furthermore, the reliance upon a specific contribution from the unknown sites yet to be identified in South Norfolk may require unsustainable sites to be

brought forward rather than identifying more sustainable sites now. In the absence of such specific sites being identified and allocated this will also adversely affect the housing land supply position of the Councils and provide for a lack of certainty going forward.

8. THE SITES PLAN

Introduction

8.1 A Sites Plan will accompany the strategic policies of the GNLP and booklets for each settlement identifying the preferred new sites for allocation and allocations which are proposed to be carried forward from the existing Development Plan, as well as sites which are considered to be reasonable and unreasonable alternatives.

8.2 The opportunities provided from the development of the site at Land at Walcot Green Lane, Diss are outlined below. Following which, the way these have been considered in the site selection process which was undertaken through the Site Assessment Booklets and the Sustainability Appraisal, is considered.

Land at Walcot Green Lane, Diss

8.3 As a Main Town, Diss provides a broad range of community facilities including GP surgeries, a primary and secondary school, a youth and community centre, an arts centre plus a range of retail outlets and services. It also benefits from a train station providing services to Norwich to the north and beyond and London Liverpool Street to the south, as well as regular bus services. The Town is also located on Sustrans cycleway route 30. Diss is therefore a highly sustainable settlement with a broad range of services and facilities with both sustainable and public transport linkages.

8.4 Nevertheless, notwithstanding the obvious sustainability credentials of Diss to accommodate additional development, it is proposed to allocate sites for only 400 new dwellings at the town and to carry forward 343 commitments, providing a total of just 743 new dwellings at the settlement for the plan period up to 2038.

8.5 Moreover, as stated in previous representations above, Diss is an existing net importer of workers and new housing is required at the settlement in order to balance homes and jobs, this is even more important given the proposed re-allocation of 10.8ha of employment land at the settlement.

8.6 Paragraph 320 of the GNLP states;

"While delivery of housing has been good in recent years, associated environmental constraints place limits on the potential for housing expansion.

Local evidence shows that traffic constraints, particularly on Victoria Road, also reduce the potential for significant expansion."

8.7 The evidence base for Diss supporting the sites allocation document also states that;

"The plan seeks to avoid the coalescence of Diss with nearby villages, particularly Roydon to the west. As such, the scope for expansion of the town through this plan is constrained."

8.8 The evidence base for the GNLP identifies that the Diss Leisure centre has requested improvements and that doctors' surgeries are currently oversubscribed. Planning additional new development over and above the allocated sites to deliver 400 new homes would help provide contributions towards improvements to such community facilities. It is not likely that 400 new homes will provide sufficient contributions to adequately mitigate the infrastructure requirements identified in the evidence base.

8.9 As a Main Town Diss provides services and facilities to its surrounding villages and hamlets plus a wider rural hinterland, it is important therefore that services and facilities in the town are adequately maintained and enhanced for the benefit of existing and new residents.

8.10 The Site has capacity to deliver 120 new homes plus around 10 self- build plots. The site is located to the north east of the town so its development would not result in Diss merging with adjacent villages. Development of the site would also require improvements to Walcot Green Lane including the provision of a two-way carriageway resulting in improvements to the existing highway infrastructure to the north of the town.

8.11 The Council's own evidence base (Sites Document Stage 3) states that owing to current congestion on Victoria Road that Walcot Green Lane is used as a preferred route into town by many residents, providing highway improvements to Walcot Green Lane as a result of housing development at GNLP 1044 would therefore result in highway safety benefit to the local community.

8.12 Those accessing the site need not use Victoria Road as the strategic highway network can be accessed via Walcott Green, Frenze Hall Lane and Sandy Lane. Moreover, the site is in easy walking and cycling distance of the railway station and thus provides for accessible and sustainable public transport linkages.

Enhanced pedestrian connectivity to the services and facilities of Diss, including schools, health and community facilities and the retail offer of the Town Centre can be provided through DIS4 (Orchard Croft).

- 8.13 The Concept Plan for Land at Walcot Green Lane has been designed to respond to landscape considerations through the delivery of a high-quality landscape-led scheme with a new strategic landscape buffer between housing development and Walcot Green Hamlet plus generous new open space and a circular walk for the benefit of the community. The scheme also includes the provision of a range of house types to respond to the needs of a wide range of users, including the older population, or those with limited mobility plus those looking to self-build.
- 8.14 Therefore, the Land at Walcot Green Lane (GNLP 1044) not only provides a sustainable development in its own right, it also provides betterment to the village by providing the opportunity to address existing highway infrastructure issues and to meet local housing needs.

Site Assessment Booklet

- 8.15 The Site Assessment Process Methodology which has informed the Greater Norwich Local Plan Regulation 18 Consultation is set out in the Introduction and Methodology section of the Site Assessment Booklets.
- 8.16 The Site Assessment Process Methodology identifies a 7-stage process which was employed for the purposes of assessing sites:
- Stage 1- List of sites promoted in the settlement
 - Stage 2 - Housing and Economic Land Availability Assessment (HELAA)
 - Stage 3 - Summary of the consultation comments
 - Stage 4 - Discussion of submitted sites
 - Stage 5 - Shortlist of reasonable alternative sites for further assessment
 - Stage 6 - Detailed site assessments of reasonable alternative sites
 - Stage 7 - Settlement based appraisal of reasonable alternative sites and identification of preferred sites.

8.17 All of the sites analysed in the Housing Economic Land Availability Assessment (HELAA 2017) are also considered in the Sustainability Appraisal published in January 2020.

8.18 The way in which each of the sites in each settlement were considered is set out in the relevant Site Assessments Booklet.

Stage 1 - List of sites promoted in the settlement

8.19 This Stage identified all of the potential alternative sites in each settlement, including the Land north of Frenze Hall Lane and West of Walcot Green Lane (GLNP 1044).

8.20 Land north of Frenze Hall Lane and West of Walcot Green Lane was considered as a residential development with a site area of 10.95 ha and for an unspecified number of residential units.

Stage 2 - Housing and Economic Land Availability Assessment (HELAA)

8.21 The site selection process then took account of the information which had been gathered for each site in the HELAA, which categorises the performance of each site as either 'red', 'amber' or 'green' against different criteria.

8.22 The HELAA categorised the Land north Frenze Hall Lane and West of Walcot Green Lane as 'red' in terms of Transport and Roads, which means that;

"Development of the site would have an unacceptable impact on the functioning of trunk roads and/or local roads that cannot be reasonably mitigated." (p. 9 HELAA 2017).

"Sites which score red under the absolute constraints list (see section 4 above) will automatically be considered unsuitable. Other red scores will be assessed using professional officer judgement to consider whether there may be the possibility of mitigation. For example in the case of access or roads/transport it may be possible to create an adequate access or improve the road network/provide footpaths so in these cases the site will be considered as suitable for the purposes of the HELAA."

8.23 Notwithstanding the above statement the HELAA concluded that site 1044 was unsuitable and was therefore considered to be inappropriate for the land availability assessment.

- 8.24 Evidence is submitted with this representation that demonstrates that Walcott Green can be adequately mitigated to provide for the development of the site.

Stage 3 - Summary of the consultation comments

- 8.25 All of the sites were subject to consultation in both January to March 2018 and October to December 2018. These consultation comments inform the next stage of the site selection process.

- 8.26 As recorded in the Site Assessment Booklet for Diss, comments were received in support of the development of Land north Frenze Hall Lane and West of Walcott Green Lane drawing particular support for the Concept Plan advanced by Pigeon and taking account of the opportunity to link into the northern end of the Persimmon Homes development to the south thereby facilitating improved access by sustainable means to the train station, public transport and town centre. However, objections were also received primarily identifying a resistance to the allocation of any sites at Diss in advance of the preparation of the Neighbourhood Plan.

Stage 4 - Discussion of submitted sites

- 8.27 The Introduction and Methodology report states that "in addition to the HELAA assessment and consultation responses a range of factors have been considered in order to establish whether a site should, or should not be, considered suitable for allocation and shortlisted as a reasonable alternative at this stage for further consideration". In particular, it is identified that these additional factors include a consideration of the impact on heritage and landscape, on the form and character of the settlement, the relationship to services and facilities, environmental concerns including flood risk and the existence of a safe walking route to a primary school within 3km.

- 8.28 The matter of a safe route to school along Walcott Green Lane was raised as a potential constraint but the opportunity to link with the existing footway along Frenze Hall Lane through development was identified, access was also flagged as requiring future consideration. The development of the site was cited as extending Diss into the open countryside resulting in landscaping impacts however the site was "*considered to be a reasonable alternative subject to highway considerations. It maybe that only part of the site may be suitable for allocation*".

- 8.29 As identified in the attached Delivery Statement, highway, access and landscape constraints either do not exist or can be addressed through appropriate design. Improvements to Walcot Green Lane ensure that access is not a constraint to the delivery of this site. Safe routes to school can be achieved through the site to the south and a new public circular walk is delivered in association with the custom/self-build site enhancing the existing public rights of way network.
- 8.30 A new strategic landscape buffer provides a definite edge to Diss and serves as a permanent buffer between the Site and Walcot Green Hamlet.
- 8.31 Furthermore, the setting of the heritage assets has been considered and can be appropriately addressed through the proposed landscape-led scheme.
- 8.32 Nevertheless, even without consideration of the fact that the identified constraints will be appropriately mitigated as identified in the Concept Plan and without consideration of the significant planning gains which would be provided through the allocation of Land north of Frenze Hall Lane and West of Walcot Green Lane, the site was identified as providing a reasonable alternative in the site selection process at Stage 4.

Stage 5 - Shortlist of reasonable alternative sites for further assessment

- 8.33 The reasonable alternative sites were then shortlisted in Stage 5 including the Land north of Frenze Hall Lane and West of Walcot Green Lane.

Stage 6 - Detailed site assessments of reasonable alternative sites

- 8.34 The reasonable alternatives were subject to further assessment by officers from the partner councils including Development Management, Conservation, Highways, Flood and Education colleagues. It is also identified that they were discussed at a series of workshop sessions where professional advice was received and that site visits were undertaken. The results of these further assessments are presented in Stage 6 of the Site Assessment Booklets.
- 8.35 The HELAA conclusions identify that part of the site is adjacent to the mainline railway and that some noise mitigation may be required. It highlights that the site is within 1 mile of a range of services, including employment opportunities, school shops and the railway station. Potential impact on heritage assets and wildlife sites are highlighted. The impact on the local highway network is particularly raised and considered unlikely to be satisfactorily addressed owing

to narrow roads, it concludes that owing to significant highway constraints, the site is unsuitable for the land availability assessment.

8.36 External consultee comments include a response from Children's Services that there is considerable pressure for school places in Diss and that any further growth would require new school provision.

8.37 All of the constraints identified at Stage 6 are able to be addressed through mitigation and do not prevent the delivery of the site as set out in the accompanying Delivery Statement and Concept Plan, which proposes a form of development different to that originally proposed and assessed by the site selection process.

Stage 7 - Settlement based appraisal of reasonable alternative sites and identification of preferred sites

8.38 Stage 7 identifies those sites considered suitable for allocation at Diss plus reasonable alternative sites. Land north of Frenze Hall Lane and west of Walcot Green Lane is stated as 'unsuitable for development' owing to highway constraints '*and the fact that it would extend the built up area of Diss into the open countryside with consequential landscape impacts*'.

8.39 This does not recognise the opportunities to address the existing infrastructure constraints provided by new development to the benefit of existing and future residents, especially the fact that existing residents already use Walcot Green Lane to access the town instead of Victoria Road because of traffic congestion and that development of the site would result in highway improvements to Walcot Green Lane, plus enhanced public open space, footpath connectivity and a circular footpath route to the north of the town.

8.40 The land west of Walcot Green Lane will be served from a new priority junction on Walcot Green Lane serving an internal network of secondary streets. Rights are reserved over the residential development (Orchard Croft) immediately to the south for a link to the loop estate road (Harrier Way), this link will be incorporated into the scheme to provide a pedestrian/cycle link, and also as an emergency second point of access to the Site.

8.41 This link together with footpaths through Orchard Croft to Frenze Hall Lane provides a high-quality walking and cycling route from the scheme to employment areas on Vines Road, to the railway station, schools, and town

- centre facilities, as illustrated on the Pedestrian and Cycle Links Plan at Appendix 4 of the accompanying Delivery Statement. The Site is located in a highly sustainable location, less than 15 minutes' walk from the railway station.
- 8.42 Walcot Green Lane is currently a single lane, the road will be widened (including the junction with Frenze Hall Lane) to a full two-lane road hence providing capacity to accommodate development generated traffic and benefiting existing users of the road. All highway works can be carried out within existing highway land, or land within the control of the Landowners. As such, access does not present a constraint to delivery of the Site.
- 8.43 In the context of the guidelines of the NPPF it is considered that there are no residual cumulative impacts in terms of highway safety or the operational capacity of the surrounding transport network.
- 8.44 With regard to landscape, the Site is not covered by any statutory landscape designations. The character of the Site is typical of arable fields to the north of Diss. The Site has clearly defined tree and hedge planting to the principal boundaries and the southern part of the Site is contained by Diss itself and modern housing development.
- 8.45 To minimise any potential effects on the wider landscape, the Concept proposes generous new areas of open space on the eastern side of the Site and extensive areas of new landscaping, incorporating a new recreational footpath link with existing PROW FP37, to the north. The combination of existing field boundaries and extensive areas of new landscaping, incorporating woodland planting, to the north of the Site will ensure that a gap is maintained between Diss and Walcot Green hamlet to the north, thereby protecting the character of the hamlet and providing a transition between the edge of Diss and the surrounding landscape.
- 8.46 The Concept Plan shows the opportunities for creating green corridors throughout the Site, illustrating how new footpath links will be provided, creating links with the existing PROW network and a new circular walk, providing significant amenity space for walking, running, dog walking and recreation.
- 8.47 The Concept Plan has been developed with a landscape-led design approach, including restoration of historic field boundaries, with the result that a strong landscape structure will be integral to the design. A variety of green

infrastructure including landscaping, public open space and bio-diverse SuDS features will also be provided.

Sustainability Appraisal of the Greater Norwich Local Plan Regulation 18 published in January 2020

- 8.48 A Sustainability Appraisal (SA) has been carried out in support of the GNLP. This assesses 11.56ha of Land north of Frenze Hall Land and West of Walcot Green Lane as a reasonable alternative for a residential development of up to 289 homes. It was never proposed that this site could or should be delivered in its entirety as residential development and accordingly the SA does not assess the form of development now proposed at this site, namely a landscape led scheme for approximately 120 homes with around 10 custom/self-build plots.
- 8.49 SA Objective 1 – Air Quality and Noise – the SA identifies the Site as scoring a minor negative against noise and air pollution owing to the eastern parcel of the site lying adjacent to a railway line with end users being exposed to higher levels of noise pollution and vibration associated with the railway. The concept plan demonstrates that the self-build plots on the eastern parcel of the site would be located adjacent to Walcot Green Lane and therefore some distance from the railway line with an extensive area of open space and new landscaping, thereby minimising potential effects from noise and ensuring that the scheme would experience a high level of residential amenity, the impact of the railway is therefore considered to be minimal.
- 8.50 The SA also states that as the site is proposed to deliver more than 100 dwellings that this would result in a ‘significant increase in air pollution’. Given the sustainable location of the site less than 1 mile from schools and other services and facilities provided in the Main Town, and the fact that a purpose built high quality pedestrian and cycle link can be provided via Orchard Croft, and the location of the site in close proximity to Diss railway station, it is not considered that the site would give rise to a significant increase in local air pollution.
- 8.51 Furthermore, the operational impact of the scheme on existing air quality receptors is also predicted to be negligible and the air quality at the site is predicted to be within the relevant health-based air quality objectives and so it is likely that the SA overstates the effect of the proposed development under this objective.

- 8.52 SA Objective 2 – Climate Change Mitigation and Adaptation – the SA scores the Site with a minor negative concerning climate change mitigation and adaptation as it states that the eastern edge of GNL1044 coincides with an area determined to be at low risk of surface water flooding. Given this area will be within land shown to be public open space on the Concept Plan the SA is considered to be erroneous in its assessment of the site (which scores minor negative in the SA) as end users would not be located in an area at risk of surface water flooding. Therefore, the Site should be assessed more favourably under this objective to better reflect the proposals of the submitted Concept Plan.
- 8.53 SA Objective 3 – Biodiversity, Geodiversity and Green Infrastructure - The Site is shown to have no impact on this SA criteria, however the Concept Plan demonstrates that biodiversity and Green Infrastructure will be substantially enhanced by the proposals as shown on the Concept Plan through the reinstating of boundary hedges and provision of new Green Infrastructure linkages connecting to the existing public rights of way network to the north of Diss.
- 8.54 The Site offers good opportunity to provide an enhancement to its biodiversity interest through the provision of a more diverse range of species habitats than is currently present e.g. semi-natural greenspace, including SuDS features and additional tree planting as shown on the Concept Plan together with landscaping to provide a resource for pollinators, bird and bat boxes and measures to allow hedgehogs to cross through the scheme. In this regard, the proposed significant new areas of open space and landscaping have the potential to deliver a net biodiversity gain.
- 8.55 Therefore, the scoring of the Site should be enhanced with regard to this criterion in the SA to at least a minor, if not a double positive.
- 8.56 SA Objective 4 – Landscape – The SA scores the site with a minor negative as it comprises ‘arable farmland and is situated outside the existing settlement.’ Therefore, it is considered to ‘potentially be discordant’ with the key landscape characteristics of the ‘Waveney Tributary Farmland’ and ‘Waveney Rural River Valley’ landscape character areas in which it is located and expected to have a ‘minor negative impact on the local landscape character’. The SA also refers to potential coalescence between Diss and Walcot Green hamlet as a result of the development of the site.

- 8.57 It is simply not possible, or appropriate, for all the development needs of Diss to be provided on brownfield sites within the town such that development at the town has no impact on landscape character.
- 8.58 Moreover, the preliminary landscape assessment for the site has ascertained the Concept Plan Concept proposes generous new areas of open space on the eastern side of the Site and extensive areas of new landscaping, incorporating a new recreational footpath link with existing PROW FP37, to the north. The combination of existing field boundaries and extensive areas of new landscaping, incorporating woodland planting, to the north of the Site will ensure that a gap is maintained between Diss and Walcot Green hamlet to the north, thereby protecting the character of the hamlet and providing a transition between the edge of Diss and the surrounding landscape.
- 8.59 The Concept Plan has been developed with a landscape-led design approach, including restoration of historic field boundaries, with the result that a strong landscape structure will be integral to the design. A variety of green infrastructure including landscaping, public open space and bio-diverse SuDS features will also be provided.
- 8.60 It is considered that as a result of the landscape enhancements proposed that the SA should not record a minor negative against the site but at least a 'no effect' score and at best a minor positive score.
- 8.61 SA Objective 5 – Housing - The SA indicates that the site scores a major positive with regard to the delivery of housing owing the fact that more than 100 dwellings are proposed. This remains the case with the site proposing around 120 homes comprising a mix of market and affordable housing, some of which will comprise bungalows to meet the needs of the ageing population and to provide choice to the market. Approximately 10 custom/self-build units are also proposed providing additional choice to the market at the site for those seeking to deliver their own home.
- 8.62 SA Objective 6 – Population and Communities – The SA scores the Site with a minor negative against this criterion as it is located either wholly or partially outside the target distance to the following three services at Diss;
- Diss Food and Wine
 - Tesco

- Diss Post Office
- Shell Garage

8.63 However, this criterion fails to recognise proximity of distance of a site to other community services and facilities such as schools, healthcare, employment or public transport which also provide essential services for local communities.

8.64 The Site is within close proximity of Diss Junior School and Diss High School, is in close proximity to both bus stops and the train station and in close proximity of a day nursery. The site is also well located in respect of the strategic employment area to the east of Diss. To that end the site should not score a minor negative with regard to population and communities.

8.65 SA Objective 7 – Deprivation - whilst this is identified as an SA objective, no assessment has been undertaken of the potential effects of development upon deprivation and every site across the GNLP area is assessed as having no impact.

8.66 SA Objective 8 – Health – The SA scores the site as minor negative for health however the text in the SA for this criterion reveals the following scoring for GL1044;

- A minor positive impact for being within 600m of natural green space, play space etc...
- A minor positive impact for being located over 200m from a main road
- A minor positive impact for being located within target distance of leisure centre
- A minor negative impact for distance from A&E department
- A minor negative impact for target distance to Lawns Medical Practice

8.67 Given the site scores 3 minor positives and 2 minor negatives, the positives outweigh the negatives and the site should score a minor positive not an overall minor negative.

8.68 SA objective 9 – Crime - whilst this is identified as an SA objective, no assessment has been undertaken of the potential effects of development upon crime and every site across the GNLP area is assessed as having no impact.

- 8.69 SA Objective 10 – Education – The SA scores the Site with a minor negative with regard to education, however the text of the SA states that while the site is not within the target distance of the primary school it is within the target distance of the secondary school, therefore the minor negative with regard to primary education is cancelled out by the minor positive of proximity to secondary education. Therefore, the site should score as ‘no impact’ with regard to education.
- 8.70 SA Objective 11 – Economy - The SA scores the Site with a minor positive impact concerning the local economy owing to its proximity to the ‘Diss cluster’. However, there is no acknowledgment of the proximity of the site to the Diss Strategic Employment Area. The site would also provide new workers for new jobs from the allocated employment sites in Diss and therefore would have a further positive economic impact by assisting in balancing homes and jobs for the town. It is therefore considered that the site should score a major positive with regard to the economy criteria.
- 8.71 It is noted that site GNLP0102 Frontier Agriculture, the brownfield residential allocation adjacent to the railway station, scores a major negative with regard to the economy owing to the loss of an existing site used for employment purposes.
- 8.72 SA Objective 12 – Transport and Access to Services – The SA scores the site with a minor negative concerning this criterion, however analysis of the text demonstrates the following;
- A minor positive impact as located within target distance of the railway station
 - A minor positive impact on accessibility and connectivity to existing road network
 - A minor negative impact on target distance to a bus stop with regular bus services
 - A minor negative impact on local accessibility and access to the surrounding footpath network
- 8.73 The Concept Plan accompany these representations demonstrates just how well the site can link with the existing PROW network and the fact that new PROW

- and a new circular walk are provided at the site for the benefit of all residents. On this basis the SA score should be amended to major positive with regard to local accessibility and access to the surrounding footpath network and overall the site should score a major positive with regard to transport and access to services.
- 8.74 SA Objective 13 – Historic Environment – The site scores a minor negative with regard to its potential impact on the setting of three listed buildings within 420m of the site. However, those buildings within Walcot Green Hamlet to the north have clearly defined landscape boundaries and do not present a constraint to development. Furthermore, the combination of the existing Site boundaries together with extensive areas of new landscaping along the Site’s northern boundary shown on the Concept Plan will ensure that there would be no harm to the setting of these designated heritage assets.
- 8.75 SA Objective 14 – Natural Resources, Waste and Contaminated Land – The SA scores the site as minor negative with regard to natural resources, waste and contaminated land. Negative scores are attributed to waste generation of more than 62 houses; inefficient use of land and permanent and irreversible loss of ecologically valuable soils; loss of Grade 3 agricultural land.
- 8.76 It is noted that the green field site of Orchard Close to the south of the site was considered suitable for allocation in the previous local plan, it too would have represented the loss of Grade 3 agricultural land and ecologically valuable soil, yet it was allocated for residential development.
- 8.77 The Concept Plan shows the amount of the Site given over to open space and therefore the retention of open space and provision of new Green Infrastructure are considered to provide a balance to the development of the site.
- 8.78 The SA also suggests that the use of previously undeveloped land would necessarily be an inefficient use and land. As a result of the housing need and the capacity of previously developed sites, this is not a credible position as it will be necessary for some greenfield development to be forthcoming.
- 8.79 SA Objective 15 – Water – The SA assesses the Site as having no impact with regard to water.
- 8.80 In summary, the SA has assessed a fundamentally different proposal for the Land North of Frenze Hall lane and West of Walcot Green Lane to that now being

promoted through the Regulation 18 public consultation. The attached Concept Plan proposes a landscape-led development that addresses pre-existing highway issues along Walcot Green Lane and which provides for substantial new open space and green infrastructure at the site, including a purpose-built high-quality pedestrian and cycle link via orchard Croft. Had the SA assessed what is actually being proposed on the site, it would have concluded that the Site was highly sustainable and gives rise to major positive effects.

- 8.81 There are also numerous inexplicable or unexplained conclusions reached within the SA which will need to be reconsidered or explained in the light of the available evidence submitted with these representations before the Regulation 19 version of the plan is published.

Conclusions on the Sites Plan

- 8.82 As identified throughout these representations, the site selection process (including the Site Assessment Booklets and the SA) which has informed the allocations proposed within the GNLP is flawed including because:
- 8.83 The Site has been considered in the SA as providing a total of 289 dwellings plus the form of development proposed in the Sites Assessment booklet is different to that now being proposed by Pigeon at the site for 120 homes including bungalows and affordable dwellings plus up to 10 custom/self-build dwellings with considerable public open space and green infrastructure improvements.
- 8.84 Many of the conclusions reached have been affected by the consideration of a proposal which is not being advanced;
- It assumes that infrastructure constraints act as a barrier to development rather than seeking to identify whether these can be addressed through new development for the benefit of all;
 - A number of the findings within the SA are not explained or understandable;
 - It does not take any account of the opportunities provided by the delivery of some sites, such as at Land north of Frenze Hall Lane and west of Walcot Green Lane to address pre-existing issues;

- It is based on a high-level assessment without the benefit of the detailed work having been undertaken as has been done on behalf of Pigeon which demonstrates that the Land north of Frenze Hall Lane and west of Walcot Green can be sustainably delivered.

8.85 Pigeon would welcome the opportunity to meet with officers to discuss the opportunities which can be provided through the delivery of the site at Land north of Frenze Hall Lane and west of Walcot Green Lane.