



## **GREATER NORWICH LOCAL PLAN**

**Stage C Regulation Draft Strategy and Site Allocations  
West of Shelfanger Road and East of Heywood Road, Diss (Site References GNLP0291  
and GNLP0342)**

**Prepared by Strutt & Parker on behalf of M Scott Properties Limited**

**March 2020**

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Site Name:	West of Shelfanger Road and East of Heywood Road, Diss (Site References GNLP0291 and GNLP0342)
Client Name:	M Scott Properties Limited
Type of Report:	Stage C Regulation Draft Strategy and Site Allocations
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## Greater Norwich Local Plan

### Stage C Regulation 18 Draft Strategy and Site Allocations

#### West of Shelfanger Road and East of Heywood Road, Diss (Site References GNLPO291 and GNLPO342)

1. This document has been prepared by Strutt & Parker on behalf of M Scott Properties Ltd (Scott Properties) and is submitted in response to the Greater Norwich Local Plan Regulation 18 Stage C Consultation. It includes responses to the Draft Greater Norwich Local Plan – Part 1 The Strategy; Draft Local Plan – Part 2 Site Allocations; and the Greater Norwich Local Plan Interim Viability Study (November 2019) as part of the Evidence Base.
2. Previous consultation submissions have been made in respect of GNLPO342 only, but this document now covers GNLPO291 also (referred to collectively as “the Site” following an agreement with the Landowners of GNLPO291. The Site is proposed as residential allocation in the Draft Local Plan – Part 2 Site Allocations document. The proposed allocation of the Site is strongly welcomed on the basis that it is deliverable, suitable, and achievable and will bring much needed new housing to Diss as is explained throughout this consultation response.
3. Our client is currently in discussions with the Landowners of site GNLPO250 to bring forward the allocation as a single site and meet the aspirations of the policy wording.
4. Discussions have also taken place with the owner of GNLPO119. This is a residential dwelling which was purchased relatively recently in August 2019. This parcel is not needed to facilitate access to the allocation and a quick appraisal based on the value paid for the property shows that it will not be viable for inclusion as development land on an equalised basis. As such it is proposed that the allocation area is amended to include GNLPO291, GNLPO342 and GNLPO250 only (“the Allocation”).
5. There are two further changes to make to the site boundary – the area of land registered under NK165744 is not included within the ownership of GNLPO291 and land registered under NK442223 is not currently included within the ownership of GNLPO342.
6. The above points are all considered on the Opportunities and Constraints Plan and Concept Masterplan included within the appendices, and the revised Allocation area as proposed is 7.98ha.

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### West of Shelfanger Road and East of Heywood Road, Diss (Site References GNL0291 and GNL0342)

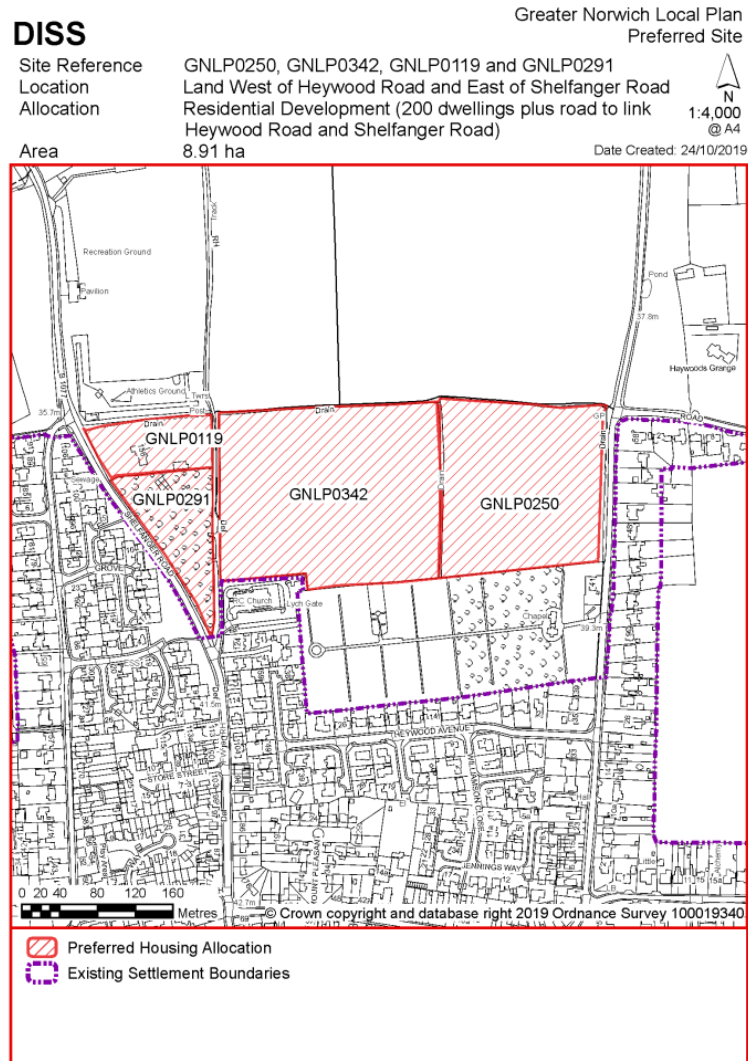


Figure 1: Greater Norwich Local Plan Preferred Site

- The Site, as well as the Allocation in general, is supported by Diss Town Council as they are 'well related in form and character in terms of the existing built up area of Diss and would enable the provision of a link road to connect Heywood Road and Sheflanger Road, which may alleviate some existing traffic problems'. It is recommended by the Town Council that it is a Preferred Option for the Greater Norwich Local Plan.

#### Draft Greater Norwich Local Plan – Part 1 The Strategy

- We have set out our response below to relevant questions from the Draft Greater Norwich Local Plan – Part 1 The Strategy as follows, having regard to the above site.

#### Question 6: Do you support or object to the vision and objectives for Greater Norwich?

- The vision for the Local Plan is to achieve a 'vibrant, healthy, inclusive and growing communities supported by the delivery of new homes, infrastructure and an enhanced environment.' It is clear from Section 3 – The Vision and Objectives for Greater Norwich that a key theme throughout is

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playing a part in the national commitments to achieving net zero greenhouse gas emissions by 2050.

10. Scott Properties is passionate about the need to address Climate Change. It is agreed that this is one of the most important factors to our future and as such should be a key consideration in the preparation of the new Local Plan.
11. Chapter 14 of the National Planning Policy Framework (NPPF) focusses on 'Meeting the challenge of climate change, flooding and coastal change'.

*"The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure."*  
(Paragraph 148 – NPPF, 2019)

12. The Plan needs to be visionary looking forward beyond 2038 in particular having regard to the Government's commitment to reach Net Zero Carbon by 2050. The Plan needs to understand what the implications of Net Zero Carbon will be, and develop an appropriate strategy to ensure that this will be achievable within the plan area.
13. We believe that our client's site can help address the visions and objectives for the Greater Norwich area, and strongly support its inclusion in the draft Local Plan as a Site Allocation.
14. The proposed development of the site will involve the development of up to 200 homes, an area for the expansion for the existing Diss Cemetery as well as the provision of a link road along the northern edge of the site, to link Shelfanger Road in the west to Heywood Road in the east.

#### **Question 9: Do you support, object, or have any comments relating to the approach to Housing set out in the Delivery Statement?**

15. The Delivery Statement set out at Paragraph 139 of the Draft Strategy sets out that the Plan will promote a pro-active approach to delivery through only allocating housing sites where a reasonable prospect of delivery can be evidenced, taking into account policy requirements. This approach accords with para 67 of the NPPF and is supported. In terms of providing flexibility and including a 9% buffer this accords with the objective of ensuring that a sufficient amount and variety of land can come forward. It is also recognised that it is proposed that the buffer will increase to 10% at the regulation 19 stage, when the village clusters allocations will be included. It is acknowledged that the plan aims to comply with the NPPF paragraph 68 requirement to accommodate at least 10% of housing requirement on sites no larger than 1 ha. However, given the uncertainty around the Carrow Works site (1,200 homes), it is recommended that where reasonable alternative sites exist in sustainable locations, additional smaller sites of up to circa 25 dwellings (the expected yield from a site of 1 ha) should also be allocated throughout the Plan area to increase certainty around delivery and supply, particularly in the early parts of the Plan period, supporting the Government's objective of significantly boosting the supply of homes.

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### Question 11: Do you support, object, or have any comments relating to the approach to Infrastructure set out in the Delivery Statement?

16. Further to the above, the Delivery Statement states that it will continue to work to coordinate delivery with providers including Highways England and Anglian Water to ensure infrastructure will be delivered. The below approach outlined within the statement is also supported by my client.
- On-site and off-site provision required of development through conditions or legal agreements;
  - Pooled use of CIL;
  - Maximising opportunities to access Government and other sources of funding;
  - Capital investment of public bodies and utilities companies; and
  - Locally led delivery vehicles.

### Question 12: Do you support, object, or have any comments relating to the Climate Change Statement?

17. As previously outlined within our response to Question 6, Scott Properties is passionate about the need to address Climate Change and as such supports the Climate Change Statement that has been included within the Draft Strategy at paragraph 141.

### Question 13: Do you agree with the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?

18. The preferred option for the Local Plan combines the concentration of the majority of development in and around Norwich and on the Cambridge to Norwich Tech Corridor, a large focus on market towns, with an element of dispersal to villages. This approach is supported and provides a balance across a range of the objectives of the Local Plan.
19. This approach would see housing commitments providing a total minimum deliverable commitment of 6,342 within the Main Towns over Plan period of 2018 – 2038.
20. The settlement hierarchy's recognition of the contribution that the Main Towns like Diss make to the delivery of housing is acknowledged and supported. While it is acknowledged that Norwich should be the principal focus growth, the market towns have an important role in creating a vibrant sub-region, and in the case of Diss serve wide hinterlands from which people are drawn to use the town's shops, services, and facilities, including primary schools, and a secondary school.

### Question 14: Do you support, object or wish to comment on the approach for housing numbers and delivery?

21. In developing the new Greater Norwich Local Plan, it will be important that an adequate mix of sites is promoted including a proportion of smaller sites as well as sites to meet specific housing needs (including housing for older people). Our client's site at West of Shelfanger Road, Diss could make a meaningful and positive contribution towards meeting these goals.
22. With regard to the delivery of new housing, the GNLP's inclusion of a 9% buffer is supported, and while a higher buffer of up to 20% would normally be advisable to offset the potential for

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slow delivery on some sites, in particular large strategic sites. It is acknowledged that no allowance has been made in this instance for windfall within the overall supply and the contingency of approximately 2,000 homes provides additional flexibility to ensure that the overall housing needs are met. However, given the uncertainty around the Carrow Works site, (1,200 homes), it would be advisable to allocate smaller sites up to c. 25 units (c. 1 ha) across the Plan area to help boost the supply of new homes. It is acknowledged that the Plan aims to comply with para 68 of the NPPF by accommodating at least 10% of the housing requirement on sites no larger than 1 ha, however, where there are reasonable alternatives available these should be included to maintain supply and avoid the need to rely on less certain strategic sites or large contingency sites.

23. The “*presumption in favour of sustainable development*” is at the heart of the National Planning Policy Framework 2019 (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.
24. Paragraph 16 of the NPPF requires plans to be prepared positively in a way that is aspirational but deliverable. Paragraph 59 reminds Local Planning Authorities that the Government’s objective is to significantly boost the supply of homes and that it is therefore important that a sufficient amount and variety of land comes forward where it is needed.
25. To ensure that Local Authorities have specific deliverable sites they are required to maintain a 5 Year Housing Land Supply with an appropriate buffer. In addition, to ensure supply is maintained, they are also required to monitor the progress in building out sites, to comply with the housing delivery test. The Government’s recently published housing delivery figures for 2019 indicate delivery for the Greater Norwich area comprising Broadland, Norwich and South Norfolk to be at 140%. This is very encouraging, however, housing delivery can be fragile and susceptible to changes in the economy or delays in the delivery of key infrastructure necessary for strategic sites to come forward.
26. Further to the above, Policy 1 – The Sustainable Growth Strategy sets the settlement hierarchy for the Plan Area as follows:
  1. Norwich Urban Area (Norwich and Norwich Fringe)
  2. Main Towns
  3. Key Service Centres
  4. Village Clusters
27. Further detail on Village Clusters is provided at Appendix 5 of the Draft Strategy, as the preferred option the Council consider that a ‘*cluster approach better reflects the way people access services in rural areas and enhances social sustainability by facilitating levels of growth in small villages*’ This statement is supported, however it is unclear how this approach will work effectively within the Plan Area and how it will be achievable. As such, a focus should be made on small and medium sites. The distribution of growth to a variety of sites will enable a steady delivery of homes and ensure the District can meet its housing targets throughout the plan period.

#### **Question 16: Do you support, object or wish to comment on the approach to Review and Five- Year Land Supply?**

28. Policy 1: The Sustainable Growth Strategy states that the Plan will be reviewed 5 years after its adoption. At Paragraph 33, the NPPF states that Local Plans should be “*reviewed to assess*



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*whether they need updating at least once every five years” and goes on to state that reviews “should be completed no later than five years after the adoption date of that plan”. As such, it is not considered that Policy 1 is consistent with national policy and this needs to be made more clear, that a review will be undertaken within five years after adoption or in the event housing delivery falls, or housing land supply falls below the annual requirement.*

29. In respect of Five-year land supply, as outlined at Policy 1 of the Draft Strategy, the Five-year housing land supply will be calculated across the whole of the three districts comprising Greater Norwich. This approach is supported, however, given the political nature of planning decisions it should be monitored to ensure that all three districts continue to deliver in a proportionate manner.

#### **Question 17: Do you support, object or wish to comment on the approach to infrastructure?**

30. Further to the response provided above in respect of Question 11, we support the approach to infrastructure that has been set out within Policy 1 – The Sustainable Growth Strategy in that the sustainable growth strategy will be supported by improvements to the transport system, green infrastructure and services. Adequate infrastructure provision is key to supporting the development of the Plan area and enabling development to come forward. The statement provided within Policy 1 is vague and needs a greater explanation as to how the Greater Norwich Local Plan will ensure sustainable growth is supported by improvements to infrastructure.

#### **Question 18: Do you support, object or have any comments relating to the preferred approach to sustainable communities including the requirement for a sustainability statement?**

31. The preferred approach to sustainable communities is the requirement for sustainability assessments to accompany planning applications for major developments. This approach is supported and is considered to be in line with the National Planning Policy Framework.

#### **Question 25: Do you support, object or have any comments relating to the approach to on-site and local infrastructure, services and facilities?**

32. Policy 4 – Strategic Infrastructure outlines the key elements to strategic infrastructure improvements that will be undertaken to support timely delivery of growth. The approach for on-site and local infrastructure, services and facilities is as follows:

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

33. There is scope within this part of Policy 4 to also address the need to provide community uses on larger schemes that will benefit both future and existing residents.
34. This approach is supported by our client and as shown within the accompanying plans and technical notes, this approach is being taken to ensure the site brings forward the required on-site services and facilities required.

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### **Question 32: Do you support, object or have any comments relating to the approach to Self/Custom-Build?**

35. The requirement for self/custom-build within Policy 5 – Homes of the Draft Strategy requires 5% of plots on residential proposals of over 40 dwellings to be serviced self/custom build plots unless a lack of a need can be demonstrated or plots have been marketed for 12 months and not sold. This approach is considered to represent too high a proportion and if implemented would deliver significantly more plots than there is currently demand for. Currently there are 113 people on the self and custom build register in the Greater Norwich Area (2018/119). This is not a significant number of plots to identify and if some of the Reasonable Alternative sites were reviewed, a range of smaller dedicated self and custom build sites could potentially be allocated across the Plan area. These sites could also contribute to site allocations of less than 1 ha which would equate to approximately six sites, to meet the demand on the current register.
36. Furthermore, self/custom-build units are considered slower to deliver on larger sites when they are expected to be brought forward alongside main stream construction. If specific sites were allocated, construction activities could be managed phased without conflicting with mainstream construction which would demonstrably deliver new homes at a much faster rate than can be achieved through the self and custom build route. As such, it would be our recommendation that the requirement for such plots should be based on a locally identified need or demand rather than blanket approach of 5% across the Plan area with the identification of specific self and custom build site allocations.

### **Question 41: Do you support or object or wish to comment on the approach for the main towns overall? Please identify particular issues.**

37. Policy 7.2 – The Main Towns outlines that the settlements in the Plan area of Aylsham, Diss (with part of Roydon), Harleston, Long Stratton and Wymondham will provide for substantial development of around 6,300 homes. We support this although given the dispersed nature of the settlements consider that a more ambitious level of growth would be deliverable and would provide greater support to enable these rural communities to prosper and thrive. Such an approach would provide the Plan with a greater degree of flexibility in the event the larger allocations in the Norwich fringe deliver more slowly than anticipated. The Main Towns are sustainable locations that are suitable to accommodate additional growth to contribute to the overall Plan area's housing need. In particular, we support the approach to allocate development of the combined sites to the north of Diss which form the subject of Policy GNLP0250/0342/0119/0291 which are included as preferred options and provide a suitable amount of growth in relation to the settlement hierarchy, infrastructure and local constraints. This approach is supported by paragraph 72 of the NPPF which identifies that the supply of a large number of new homes can often best be achieved through planning for larger scale development, including extensions to existing villages and towns, where they are well located and supported by the necessary infrastructure and facilities.

### **Question 42: Do you support or object or wish to comment on the approach for specific towns (Aylsham, Diss (with part of Roydon), Harleston, Long Stratton and Wymondham) Please identify particular issues.**

38. In respect of Aylsham, Diss and Harleston, these settlements are more dispersed lying on the peripheries of the Local Plan area and support wider rural communities in adjoining districts. They have been identified for lower levels of growth than Long Stratton and Wymondham. As such we strongly support the proposed allocations in these towns which will help these rural

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communities to prosper and thrive. To this extent, in addition to the preferred allocations, we recommend that further consideration should be given to those sites identified as reasonable alternative allocations to further boost housing supply and support a prosperous rural economy. In respect of Diss, as outlined above, we support the approach to allocate the sites located to the north of the town under Policy GNL0250/0342/0119/0291, Land north of the cemetery, West of Shelfanger Road and East of Heywood Road, Diss. The sites combined comprise approximately 8.91 hectares for residential development and could likely accommodate 200 dwellings. However, it is recommended that the site under reference 0119 is removed from the Draft Strategy as an allocation as it has recently changed ownership and would not be viable to bring forward as part of the allocation.

**Question 48: Do you support or object or wish to comment on any other aspect of the draft plan not covered in other questions? This includes the appendices below and the evidence base on the web site. Please identify particular issues.**

39. In response to Question 48, the below comments have been made in respect of the **Greater Norwich Local Plan Interim Viability Study (November 2019)** We are generally supportive to the approach taken but have some observations in respect of the detail which we hope are helpful:

#### **Density (Table 4)**

- Net areas are only used on Typologies 6-9, but are also applicable to Typology 4, where sites will also be required to provide on-site public open space, green infrastructure and SUDS, as well as often needing to gift land for community uses.
- The density figures are presumably based on the indicative mixes in Table 5, but these do not have any allowance for housing for older people (single-storey), which will again reduce density. This will mean that the proposed density of 25 dwelling per hectare (gross) will be difficult to achieve where large proportions of bungalows are to be included.
- The net: gross ratios are likely to be circa 66% on these sites, meaning a net density of circa 38 dph will be needed.

#### **Housing Mix (Table 5)**

- As mentioned above, there is nothing for single-storey accommodation, for example housing for older people and accessible housing, despite the strong demographic arguments which demonstrate the need to provide accommodation for an ageing population.
- While housing need may suggest the proportion of 3 bedroom homes should be high in the Main Towns, demand for market properties is likely to be higher for larger family properties. Such a high percentage of two bed houses seems high at the expense of 3 and 4+ bed family housing in the Main Towns. In particular, 8% of 4+ seems very low. Market demand is likely to be circa 20% of the private dwellings with 4+ bedrooms (13% aggregated).
- The 20% for flats also seems high, the market for private flats is limited in rural locations, so we would expect this to be closer to 10% overall.

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#### Size of Dwellings (Table 6)

- Again no information has been provided for single-storey properties
- The 3-bedroom house size (102 sq. m) is for a 6-person property, so comes out large at 1,100 sq. ft.

#### Affordable Housing (Table 7 & Table 15)

- Typology 4 (Main Town) is assessed at 28% Affordable Housing but 33% is sought by policy.
- At 28% (and with current assumptions) it is the 2<sup>nd</sup> least viable (£115,872 surplus) and as such, on the Sensitivity Testing it fails across all scenarios.
- Affordable Rent – 60% is very ambitious as a return, it is recognised in the report that the range is 45% to 65%, so 50% would be a better assumption to use.
- Affordable Ownership – again it is recognised that the range can be 60% to 80%, so 70% would be a better assumption than 75%.
- As mentioned in the caveats, no account has been taken of the 5% custom build policy requirement.

#### Access

- For specialist housing developments, all (not just 20%) of homes will meet at least the M4(2) access requirement, which adds up at £940 per dwelling. It is our consideration that a new house type is required for the Study.

#### RAMS

- A justification is required in relation to the recommendation for £200 per dwelling. This was recently revised down to £122 in neighbouring Suffolk.

#### Market Revenue

- The values do not correlate with what is currently on the market, especially for the 4 bedroom properties, for which the values are overstated by as much as 43%. The below tables show all of the new build (estate) houses on Rightmove as of the 18<sup>th</sup> February 2020.

Type	Location (Diss)	Price	Benchmark
5b detached	Frenze Hall Lane	£305,000	£360,000 - £385,000
5b detached	Frenze Hall Lane	£300,000	
4b detached	Frenze Hall Lane	£284,000	
4b detached	Frenze Hall Lane	£280,000	
4b detached	Frenze Hall Lane	£270,000	
3b semi	Frenze Hall Lane	£233,000	£295,000 - £320,000
3b semi	Harrier Way	£210,000	
2b semi	Partridge Rise	£200,000	£225,000 – 255,000

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##### Build Costs

- The costs for Bungalows will be higher than £1,221 per square metre and it is suggested that consideration of bungalows is included within the Study.
- The costs for Garages have been contained within the site and infrastructure costs. CIL will also be payable on the garages which will increase the cost.
- No allowance is made for ground conditions / ground water protection / flood risk. It is important that these are factored in.

##### Sites and Infrastructure Costs (Table 10)

- 15% seems low for site and infrastructure costs, it is considered that these costs will rise over the Plan period with increased electricity requirements etc.

##### CIL/S106 (Table 11)

- As mentioned above, Garages have been excluded but will be chargeable.
- For Typology 4 – the majority of the Main Towns are in Zone B so it would make sense to use the appropriate figure.
- The 2020 figures are now available and as such should be used (£70.46 per sq. metre).
- No allowance has been made for site-specific Section 106 works such as Public Rights of Way improvements etc.

##### Benchmark Land Value (Table 12a)

- The figure for Typology 4 is £432,432 / ha = £175k / acre (gross). This does not reflect that most land is purchased at a discount to reflect the planning and promotion risks / cost time. It also doesn't consider sales agent and legal fees.
- Taking the example in the report shown below, the figure should be revised accordingly and checked against actual transactions to show that the transaction levels (and therefore expectations) are still far higher at circa £300,000 gross per acre.
- 7.5 acres @ £175k per acre = £1.312m
  - minus Agent's Fees @ 1.5% = £1.292m
  - minus Sales Legal Fees @ £10k = £1.282m
  - minus Recoverable Promotion Costs @ £150k = £1.132m
  - minus Promoter's Share @ 20% = £906k
  - = £121k per acre (= EUV x 12, not 17.5)

##### Greater Norwich Local Plan – Part 2 Site Allocations

40. Below is set out our response to relevant questions from the Draft Local Plan – Part 2 Site Allocations. This sets the preferred allocations and the respective draft policies for the new housing and employment sites proposed to be allocated for development to help implement the draft GNL0 strategy.

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### Policy GNL0250/0342/0119/0291, Land north of the Cemetery, West of Shelfanger Road and East of Heywood Road, Diss

41. Our client's site, Land west of Shelfanger Road and East of Heywood Road, Diss has been included within the Draft GNL0 Sites document as a preferred option under site references GNL0291 and GNL0342 as part of a larger allocation forming Policy GNL0250/0342/0119/0291 for 'at least 200 homes, 33% of which will be affordable' to the north of Diss. Since being submitted to the Call for Sites as only GNL0342, my client has agreed heads of terms on the site known as West of Shelfanger Road under site reference GNL0291. They are also actively engaging in discussions with the Landowner for the site known as GNL0250 and it is their intention to bring forward the three sites as a whole with a joint masterplan.
42. However, my client recommends that site reference GNL0119 is excluded from the policy and is not put forward as an allocation or part of the wider site. The site has recently changed ownership and would not form a viable portion to bring forward with the wider site given its existing residential use and value. In addition to this, it is not possible to achieve sufficient visibility splays to achieve a separate vehicular access, which further impacts its viability to be brought forward.
43. The policy wording for the Policy is outlined below:

**POLICY GNL0250/0342/0119/0291, land north of the Cemetery, west of Shelfanger Road and East of Heywood Road, Diss (approx. 8.91 ha) is allocated for residential development. The site is likely to accommodate at least 200 homes, 33% of which will be affordable.**

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

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

- Four individual sites are included in this allocation and will need a coordinated approach to design, layout, landscaping, infrastructure provision and delivery. This may require a masterplan to demonstrate how this will be achieved.
- Provision of a road linking Shelfanger Road with Heywood Road, including frontage footways to connect with existing facilities and connection with/improvements to the existing public right of way.
- Submission of a Transport Assessment for the whole allocation and provision of any identified mitigation measures.
- At nil cost to the town council, safeguard land for an extension to the cemetery.
- Consider and mitigate surface water flood risk.
- The trees/hedgerows surrounding the site will be protected, enhanced and incorporated into the scheme.

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- Design of development to take into account the presence of a high pressure pipeline located adjacent to the northern boundary of the site.
- Protection of the existing Public Rights of Ways (PROWs) located to the north and west of the site.

*Notes GNL0250/0342/0119/0291: This combination of sites is preferred for allocation as they are well related in form and character terms to the existing built up area of Diss and would enable the provision of a link road to connect Heywood Road and Shelfanger Road, which may alleviate some existing traffic problems. Development would need to be supported by a Transport Assessment.*

44. In response to the above, firstly Scott Properties welcome and support the proposed allocation of the site. However, for the reasons set out above we consider that reference to site GNL0119 should be omitted from the policy and the site area adjusted accordingly.
45. We support the requirement for a Masterplan to be provided for the site, showing a co-ordinated approach across the three sites. There is a definite need to ensure that the site comes forward in a deliverable way and that public benefits are realised. Scott Properties are actively engaging with the Landowners of GNL0250 and have already agreed terms with GNL0291.
46. The Policy requires for ‘*at nil cost to the Town Council, safeguard land for an extension to the cemetery*’. Obviously there is a value to land for burials and the inclusion of land for this type of community use will need to be off set against the provision of land for other community benefits, such as open space for sport and recreation. The exact location and extent of the cemetery extension will need to be agreed through the development of the Masterplan, but it is understood that there is a preference from the Town Council for this to be located on the east of the Site, to enable a new access from Heywood Road. In terms of current capacity, it has been confirmed that there are currently c. 1,800 plots available, equating to 40 years’ supply at the current rate of 45 burials per year. In February the Town Council resolved “*To request that the extension of the Cemetery allows for an additional 60 years of burials/ashes at the current rate of burial*”. This would provide a total of 100 years of land supply for the cemetery. We would suggest that the following work should be undertaken by the Town Council to substantiate and justify this request.
  - a. A Cemetery Risk Assessment – to ensure that the site is suitable in terms of the groundwater conditions.
  - b. A detailed Population Projection – to compare future death rates with population growth and religious groups.
  - c. A detailed assessment of future burial practice with reference to the move to a greater number of woodland/natural burials.
47. In any case, provision of an area of c. 3.4 acres (at 800 burial plots per acre) at nil cost to the Town Council could impact on the viability of the site and the ability of the site to deliver at least 200 dwellings as per the allocation wording. My client would question the extent to which projected future burial needs well into the next century and beyond the Local Plan period should be prioritised over the need to deliver housing to meet the identified needs during the Local Plan period. The Masterplan proposes an area of 1.2 acres which would provide an additional c. 20 years supply (as per the Local Plan period), and we would welcome further discussions with the Town Council and GNL0 Team on this subject.

# Greater Norwich Local Plan

## Stage C Regulation 18 Draft Strategy and Site Allocations

### West of Shelfanger Road and East of Heywood Road, Diss (Site References GNL0291 and GNL0342)

48. A Technical Note has been prepared by Atkins and provides transport and highways information to support this representation, including details on the site schematic plan on the associated road and pedestrian connections as well as the plans to retain and enhance the existing Public Rights of Way (PROW) to the north and west of the site. In conjunction with this Technical Note, a 'proposed general arrangement and access plan' and 'swept-path analysis of proposed highway access' have also been provided. A Transport Assessment will be prepared to follow on from this note and form part of the planning application at the site. The aim of providing a vehicular connection between Shelfanger Road and Heywood Road is supported, as it will improve connectivity to the north of the Diss and provide a degree of relief to Sunnyside from vehicle users who would otherwise need to take this route.
49. In addition, a Flood Risk Technical Note has been prepared by Atkins and accompanies this Representation. The Note identifies that the site is located within Flood Zone 1 and as such, flood risk at the site is considered to be low to negligible. However, it is noted that once the proposed development introduces new paved areas, the surface run off will increase and require management. Recommendations have been provided within the Technical Note which will inform future Flood Risk Assessments and Surface Water Drainage Strategies at the site forming part of any planning application.
50. A Tree Survey has been prepared by Geosphere Environmental and includes a Tree Constraints Plan at Appendix 2. This identifies Category A, B and C trees and root protection areas that will be considered throughout the development and detailed design of any proposed development. In addition to this, a Landscape Constraints and Opportunities Appraisal Plan has been prepared by Lockhart Garratt and provides an indicative landscape plan, outlining the location of retained PROW's, developable areas within the wider allocation and potential access points.
51. A Constraints Plan has also been included as part of this representation, showing the location of the high pressure pipeline as referred to within the policy, located adjacent to the northern boundary of the site, and applicable the 14.3m Building Proximity Distance (confirmed by Cadent) where no buildings may be constructed. The Constraints Plan pulls together combined information from the above reports as well as showing the location of the excluded land within GNL0291 and a water main which runs through the site (which it is proposed would be diverted).
52. A Concept Masterplan has been provided which shows a net developable area of 6.13ha. As proposed, it would be possible to achieve the target dwelling yield of 200 no. dwellings by applying a net density of 32.6 dph. This is considered achievable and feedback will be sought from Officers at South Norfolk District Council on this subject through the pre-application process.
53. The site can be brought forward through the submission of a joint Masterplan which could accompany an outline application. Initial discussions have taken place with private house builders who have expressed an interest in purchasing the site on either an unconditional (post planning) or subject to planning basis. An updated planning and delivery strategy will be agreed following pre-application advice and public consultation.
54. Scott Properties are confident that a respective development partner for the site will be identified to bring forward reserved matters applications within two years or less of outline consent being obtained. A significant amount of technical work has already been undertaken which has confirmed there are no overriding physical constraints to development of the site. Scott



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Properties intend to submit a pre-application advice request in May 2020. The proposals will be amended as required by the pre-application advice and then taken forward for wider public and community consultation. This will centre around a public consultation event planned for Autumn 2020 followed by an online and postal feedback exercise.

55. Assuming that a planning application is submitted following the Regulation 19 consultation in 2021, it is reasonable to expect that planning permission could be forthcoming before the end of 2021 allowing contractual arrangements to be completed with development partners before the end of the year (if not already concluded). Respective reserve matters applications could then be prepared and submitted in the early part of 2022 meaning that development on site could commence in 2022 via either route. Based on this assessment, it is anticipated that the first houses could be available for occupation in 2024. Assuming completions of 50 family houses per year, as set out in the table below the site could be completed in 2027.

	2024	2025	2026	2027
Family Housing	50	50	50	50

56. While the site is in multiple ownerships, Scott Properties is working closely with the owners of all three parcels so that the site can be bought forward as one. As such, development of the site is achievable. It is available now and would represent a realistic and deliverable development in the current market conditions. We further support the inclusion of the site within the Local Plan as it is located adjacent to the settlement boundary and as such would represent a logical expansion to the town. Our professional judgement is that this site could come forward with a viable residential housing scheme that is policy compliant.
57. As outlined within the National Planning Policy Framework 2019, to be considered 'deliverable', sites for housing should be *'available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.'* In summary, we consider that there is suitable for residential development, available within the next 5 years and achievable.

#### Technical Work completed to date

58. The following additional technical work has been completed and is included as appendices to this document:
- Concept Masterplan
  - Opportunities and Constraints Plan
  - Landscape Summary Note and Plan
  - Flood Risk Technical Note
  - Transport Technical Note
  - Site Accesses Plan
  - Vehicle Swept Path Analysis
  - Arboricultural Survey