

PRE-APPLICATION DOCUMENT

LAND EAST OF SHELFANGER ROAD // DISS

NOVEMBER 2020



1. INTRODUCTION

INTRODUCTION

Scott Properties is promoting Land East of Shelfanger Road, Diss (the Site) for residential development. The Site comprises the parcels GNLP0291 and GNLP0342, and extends to approximately 5.4 hectares (13.3 acres). These parcels form just over 60% of the wider area preferred for allocation for residential development of at least 200 new homes as part of emerging Policy GNLP0250/0342/0119/0291.

Pre-application advice is sought in respect of the following development proposal on the Site:

Outline planning application for up to 114 dwellings, public open space, an extension to Diss Cemetery, and associated site infrastructure, with all matters reserved except for access.

A proposed submission programme has been included as part of this document, for discussion and agreement with South Norfolk District Council and the GNLP team following the pre-application discussions.

DOCUMENT STRUCTURE

This document seeks to build on the positive pre-application discussions held to date, and comprises the following sections:

- Planning Context
- Site Assessment
- Parameter Plan and Cemetery Expansion Land
- Illustrative Masterplan and Delivery
- Access and Movement
- Consultation and Validation
- Conclusion

TECHNICAL REPORTS

A suite of technical reports were provided as part of the GNLP Reg 18C Consultation in March 2020. Further updates are now available in the areas of Transport, Flood, Utilities and Ecology, and the full reports can be provided to Officers on request.



Site Location Plan (GNLP0291/0342 / the Site / Phase 1)



2. PLANNING CONTEXT

THE GREATER NORWICH LOCAL PLAN

The GNLP Regulation 18C Draft Strategy was published for consultation in January to March 2020. This document contains the preferred site allocations and the proposed policies for the Greater Norwich area.

DISS

Diss is categorised as a Main Town within the GNLP Draft Strategy, offering a wide range of services and facilities including a mainline train station. Diss is listed as the third-largest settlement within the Greater Norwich area, with an estimated population of c. 7,500. The Draft Strategy identifies a total deliverable housing commitment of 743 new homes within Diss to 2038.

POLICY GNLP0250/0342/0119/0291

The Site forms part of a larger area of land preferred for allocation for residential development of at least 200 homes under Policy GNLP0250/0342/0119/0291 of the emerging Plan.

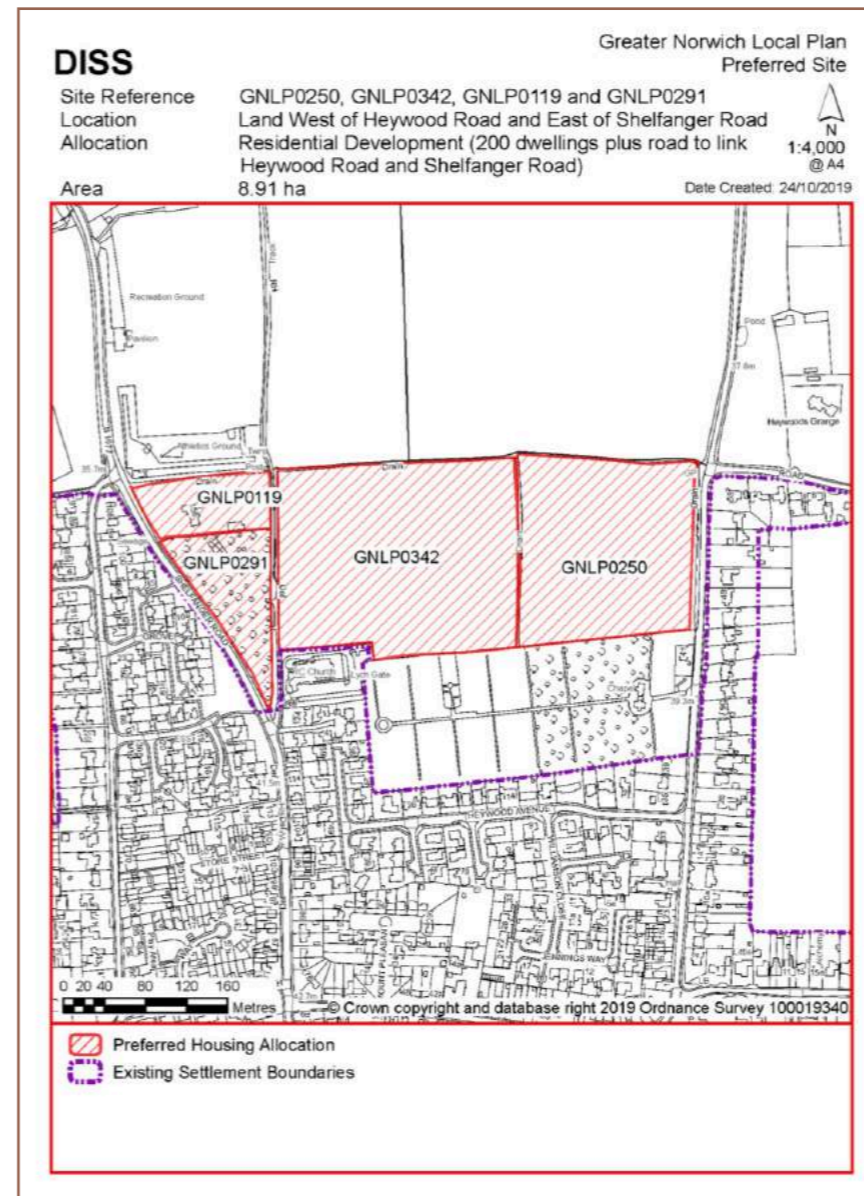
It is understood that parcel GNL0119 (156 Shelfanger Road) is to be removed from the allocation, and we have previously submitted representations regarding the viability and suitability of its inclusion. As such, the expectation is that this allocation progresses as GNL0250/0342/0291 (the Wider Allocation Site).

Since the Reg 18B consultation we have taken control of GNL0291 in addition to GNL0342, recognising the need for a joined-up approach. Whilst we are in positive dialogue with the landowners of parcel GNL0250, the ownership structure and personal circumstances are such that it will not be possible for this land to progress at the same pace as the Site (GNL0291/0342).

The requirements set out in the policy text are broadly supported, and as detailed in our Reg 18C representations, we can confirm that the various access and masterplanning requirements will be addressed as part of a future planning application. Some clarifications are sought through this pre-application request in respect of the cemetery expansion and the proposed phasing of the overall allocation, as detailed over the following pages.

DEVELOPER CONTRIBUTIONS

It is anticipated that CIL will be payable at the prevailing rate on all of the private market dwellings provided from the proposed development, and that the affordable dwellings will be exempt. Clarification is sought from Officers as to the level of S106 contributions that would be sought to address any site specific mitigation requirements.



GNLP Policy Map

POLICY GNLP0250/0342/0119/0291, 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 co-ordinated 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.
- 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.

Full GNLP Policy Wording



3. SITE ASSESSMENT

PHYSICAL CONSTRAINTS

The Site is principally in agricultural (arable) use, with scrubland and a vacant greenhouse in the western area. A public right of way runs north through the Site from Farthing Close (RB25), with another footpath immediately to the north of the Site running from Shelfanger Road to Heywood Road (FP7/FP26). There is a water main running diagonally through the Site, with rights to re-route as required. A gas pipeline is located to the north-east of the Site with a 14.3m building proximity distance restriction, which does not affect the development proposals. There are overhead electricity cables running south to north and east to west, broadly in line with the public rights of way as shown on the Constraints Plan.

FLOOD RISK AND DRAINAGE

The entire Wider Allocation Site is located in Flood Zone 1; the lowest risk of flooding from rivers and the sea. Soakage testing has been undertaken on the Site and a draft surface water strategy prepared. This involves the use of attenuation basins with natural soakage from the western basin and controlled outfall from the eastern basin discharging the runoff from the development to the existing ditch network, with flows limited to the annual greenfield runoff rate. The location of the basins is shown on the Parameter Plan and Illustrative Masterplan, with the areas proposed allowing for a 1 in 100 annual probability storm, inclusive of a 40% allowance for climate change.

ECOLOGY AND BIODIVERSITY

The Site is not located in close proximity to any SSSIs; Shelfanger Meadows is situated over 1.6km from the northern boundary with existing built form, open farmland and woodland providing an effective buffer. A Preliminary Ecological Appraisal has been carried out which recommends that further surveys are undertaken to establish the level of bat activity along the existing hedgerows, and this programme of work is due to commence shortly. In accordance with forthcoming legislation and Policy 3 of the GNLDP Draft Strategy, a biodiversity net gain of at least 10% will be delivered.

The Arboricultural Survey identified six trees and seven groups of trees on or within close proximity of the Site. Three trees and one group were classed as Category A, three trees were as Category B, and the remainder classed as Category C (six groups). All of the trees are located along the boundaries, with part of one of the Category C groups needing to be removed to facilitate the site access. There are no TPOs present and the Site is not located within a Conservation Area.

LANDSCAPE AND VISUAL IMPACT

The topography of the Site is broadly flat, with a gradual fall in levels towards the northern boundary. It adjoins the settlement boundary with Shelfanger Road and residential development to the west, and the modern St Henry Morse Roman Catholic Church and Diss Cemetery to the south. To the east of the Site is parcel GNLDP0250, with Heywood Road and residential development beyond, and a public right of way and watercourse border the Site to the north, with arable fields beyond.

An initial Landscape Summary Note and Landscape Strategy have been produced for the Wider Allocation Site, which conclude that the proposed development would fill an obvious gap between two existing areas of built form with limited adverse impacts in landscape terms. A number of recommendations are made, including the retention and enhancement of the existing boundary vegetation, the creation of a new hedgerow along the northern boundary of the Site, and retention of a small section of woodland and scrub within the south-western corner of the Site.

ARCHAEOLOGY AND HERITAGE

At its closest point at Mount Pleasant, the Diss Conservation Area boundary is c. 220m to the south of the Site. There are no listed buildings or other heritage assets within close proximity to the Site. The nearest listed buildings are at 1A and 1B Shelfanger Road (Grade II), c. 250m south of the Site and separated by existing development at Shelfanger Road and Heywood Avenue. To the north, Chestnut Tree Farmhouse (Grade II) is over 1km from the Site and set behind its own buffer along Heywood Road. It is therefore assumed that a Heritage Impact Assessment will not be required for this application. A separate pre-application enquiry has been submitted to Norfolk County Council in respect of archaeology.

UTILITIES AND SERVICES

Pre-application discussions have been held with the utilities companies to ensure that the Site can be adequately serviced. Anglian Water have confirmed that the new water supply can be provided, to be funded via the new zonal charging system. Connections can also be made to the existing foul water, electricity and gas networks, where available capacity has been confirmed.

GROUNDWATER RISK ASSESSMENT

A Groundwater Risk Assessment will be required to assess the suitability of the Site for use as a cemetery. Discussions are currently underway with the Town Council concerning who should pay for this, and when would be the appropriate time to carry out the work. We would welcome the views from Officers on these points if possible.



Constraints Plan (Wider Allocation Site)



4. PARAMETER PLAN AND CEMETERY EXPANSION LAND

PARAMETER PLAN

The Parameter Plan has been produced following an assessment of the constraints affecting the Wider Allocation Site, and shows the proposed areas for residential development and the expansion of Diss Cemetery, as well as proposals for public open space, landscaping and surface water attenuation.

DISS CEMETERY EXTENSION

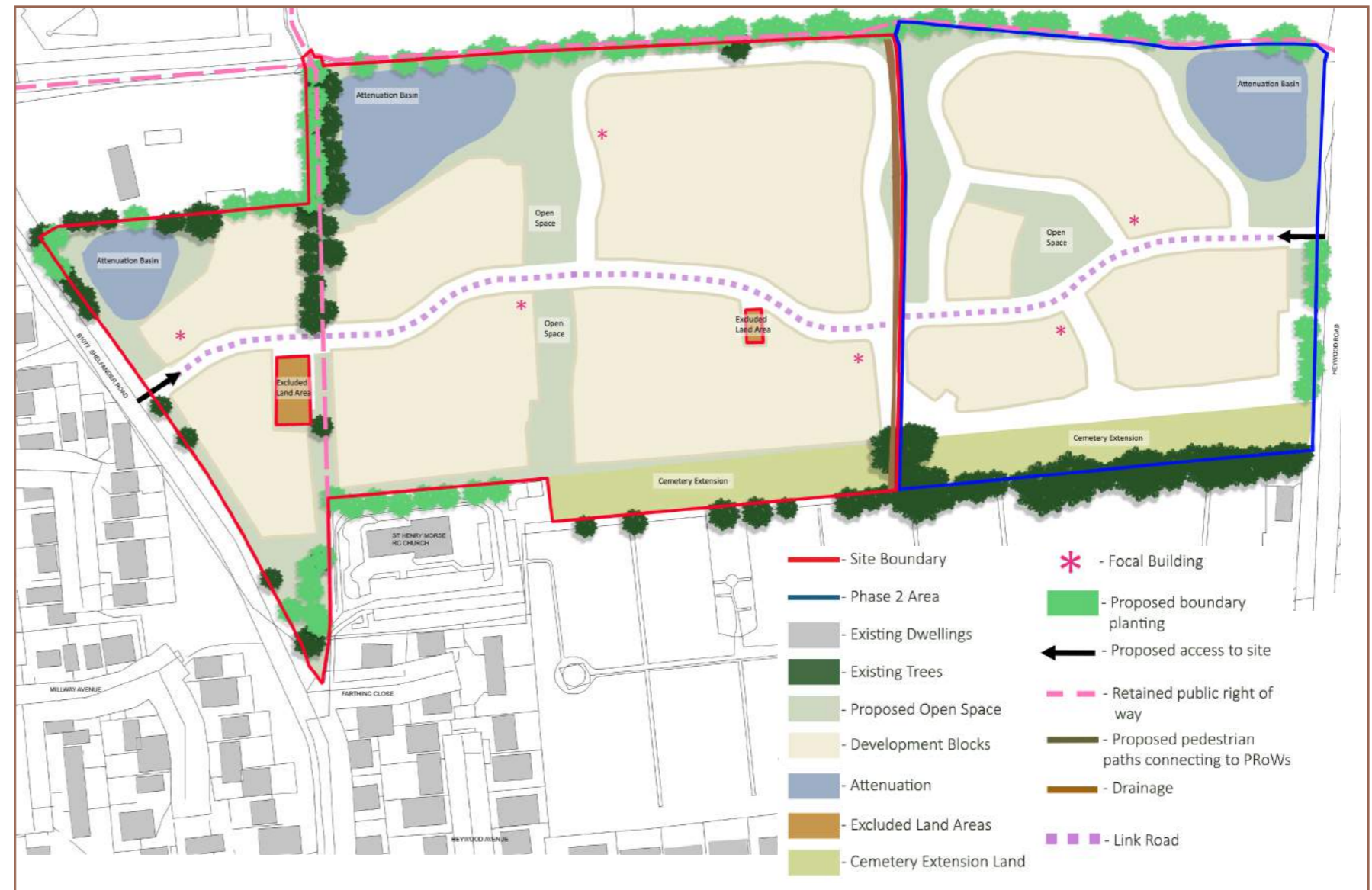
Diss Town Council confirmed in January 2020 that there are 7,407 plots within the existing cemetery site, with 1,794 plots available at the time. At the average rate of 45 burials per year there is currently a supply of c. 40 years. The Town Council resolved in February 2020 (ref. F0220/07) to request that the proposed extension allows for an additional 60 years of burials / ashes, to provide a total of 100 years of capacity. An approximate yield of 800 burials per acre is consistent with the existing cemetery, and would require c. 3.4 acres, or c. 16% of the Wider Allocation Site area (excluding GNLPO119) to meet this request.

It is submitted that the area requested is excessive and will impact on the ability of the Wider Allocation Site to deliver the number of homes allocated. If expansion of the cemetery on this scale is required in order to make the principle of residential development in Diss acceptable, then this cost should be distributed proportionately between all of the allocation sites rather than disproportionately burdening only this site.

It is understood that the provision of this land is very important to the Town Council, and as such, an area of c. 1.4 acres has been accommodated within the proposed scheme. This will provide c. 1,140 burial plots, equating to c. 25 years of supply and extending the capacity of the cemetery into the year 2085.

The provision of this land represents a significant financial benefit to the Town Council. The draft policy states that this should be provided at nil cost, and at the current rate of £875.60 for an adult Parish Resident plot, this land could generate a gross receipt to the Town Council in excess of £1,000,000. We would request that this is taken into consideration within the overall package of developer contributions sought from the proposed development.

We would welcome the views from Officers as to how this policy requirement can be addressed to ensure that an appropriate balance is reached between delivering new homes to meet the housing need over the Plan period to 2038, against providing burial land for 2060 onwards.



Parameter Plan (Wider Allocation Site)



5. ILLUSTRATIVE MASTERPLAN AND DELIVERY

ILLUSTRATIVE MASTERPLAN AND PHASING

In accordance with the emerging policy, a masterplan for the Wider Allocation Site has been prepared to ensure a co-ordinated approach to delivery. The Illustrative Masterplan shown on page 6 follows the Parameter Plan, and it is anticipated that the Wider Allocation Site can deliver c. 179 dwellings, with an illustrative layout for Phase 1 showing 114 dwellings, and a high-level concept for Phase 2 showing c. 65 dwellings. We do not think it will be possible to deliver 200+ dwellings as well as providing the cemetery extension land.



Phasing Plan

The residential and non-residential elements have been split proportionately between the two Phases. This ensures that each Phase can operate independently in terms of the provision of:

- Vehicular and pedestrian access from Shelfanger Road and Heywood Road respectively - although the two Phases will connect in the middle to form the new Link Road;
- Surface water attenuation based on the impermeable area on each Phase;
- Public open space and a contribution towards the cemetery extension;
- Connections to existing utility supplies from Shelfanger Road and Heywood Road respectively, and
- A range of house types to meet local needs, including affordable housing, housing for older people, and self and custom build plots.

The proposed gross and net densities are also consistent between the two Phases, with gross densities of 21.0 dph (Phase 1) and 21.7 dph (Phase 2), and net densities of 30.3 dph (Phase 1) and 31.9 dph (Phase 2).

HOUSING MIX (PHASE 1)

The proposed housing mix for Phase 1 is as follows.

	Private	Affordable	Total
1 bed	0	6	6
2 bed	18	21	39
3 bed	45	8	53
4+ bed	13	3	16
Total	76	38	114

Feedback is sought from Officers in respect of the proposed housing mix to ensure that it is appropriate and will meet local housing needs.

AFFORDABLE HOUSING

A fully policy compliant scheme is proposed in terms of affordable housing, with 38 affordable homes included (33.3%) in accordance with the emerging GNLP policy.

HOUSING FOR OLDER PEOPLE

It is expected that both Phases will deliver an appropriate mix of housing to meet local needs, including a proportion of housing suitable for older people. On Phase 1 a total of 4 bungalows are proposed, positioned in the northern part of the Site at plots 1, 2, 52 and 59 to create a softer northern boundary and to ensure the amenity and privacy of the neighbouring property at 156 Shelfanger Road is respected as much as possible.

SELF AND CUSTOM BUILD HOUSING

Policy 5 requires 5% of all new homes to be provided as self or custom-build for developments of 40 dwellings or more, and an allowance of 5 no. self or custom-build plots has been made at plots 110-114. Whilst the layout provided is illustrative only at this stage, it is suggested that these plots are accessed via a private drive off the central spine road for logistical and practicality reasons.

EXCLUDED LAND PARCELS

There are two parcels of excluded land as shown in the plans. The western parcel is a redundant Royal Observer Core Monitoring Post; an underground structure in separate ownership with no known development plans. The eastern parcel is a parcel of land measuring 107 sq. m which was purchased in 2014 as a potential self-build plot, which may be the subject of a separate application.

PROPOSED SUBMISSION PROGRAMME

Subject to advice from Officers, the following programme is proposed for the submission of an outline planning application on Phase 1.

Pre-application Discussions	December 2020 to January 2021
Public Consultation	February 2021
Prepare Planning Application	March 2021
Submit Planning Application	April 2021
Determination (anticipated)	October 2021

The Site will then be sold on the open market, with the anticipated timings for a reserved matters application as follows.

Pre-application Discussions	Q2 2022
Public Consultation	Q3 2022
Prepare Planning Application	Q3 2022
Submit Planning Application	Q4 2022
Determination	Q2 2023

PROPOSED DELIVERY PROGRAMME

Assuming the determination of the reserved matters in Q2 2023, it is anticipated that construction work could start in Q4 2023. A delivery rate of up to 50 dwellings per annum is considered achievable in this desirable location, resulting in the development being completed in Year 4.

	Dwellings	Cumulative
Year 1 (2023)	0	0
Year 2 (2024)	25	25
Year 3 (2025)	50	75
Year 4 (2026)	39	114

PHASE 2 (GNLP0250)

As mentioned previously, the ownership structure and personal circumstances of the landowners of GNLP0250 means that a planning application on the Phase 2 land prior to 2022 is unlikely.





Illustrative Masterplan for Phase 1 (and Phase 2 Concept)



6. ACCESS AND MOVEMENT

VEHICULAR ACCESS AND MOVEMENT

The vehicular access to the Site is proposed as a priority junction from Shelfanger Road, comprising a 6m carriageway with 2m footways on either side. Sufficient visibility splays can be achieved in both directions. This road would be delivered to an agreed point at the boundary with the Phase 2 land, to facilitate delivery of the proposed Link Road between Shelfanger Road and Heywood Road.

Whilst not proposed for consideration as part of the Phase 1 application, an equivalent junction design from Heywood Road has also been prepared. This is capable of serving the Phase 2 development and has been provided to demonstrate a co-ordinated approach to the masterplanning.

PEDESTRIAN ACCESS AND MOVEMENT

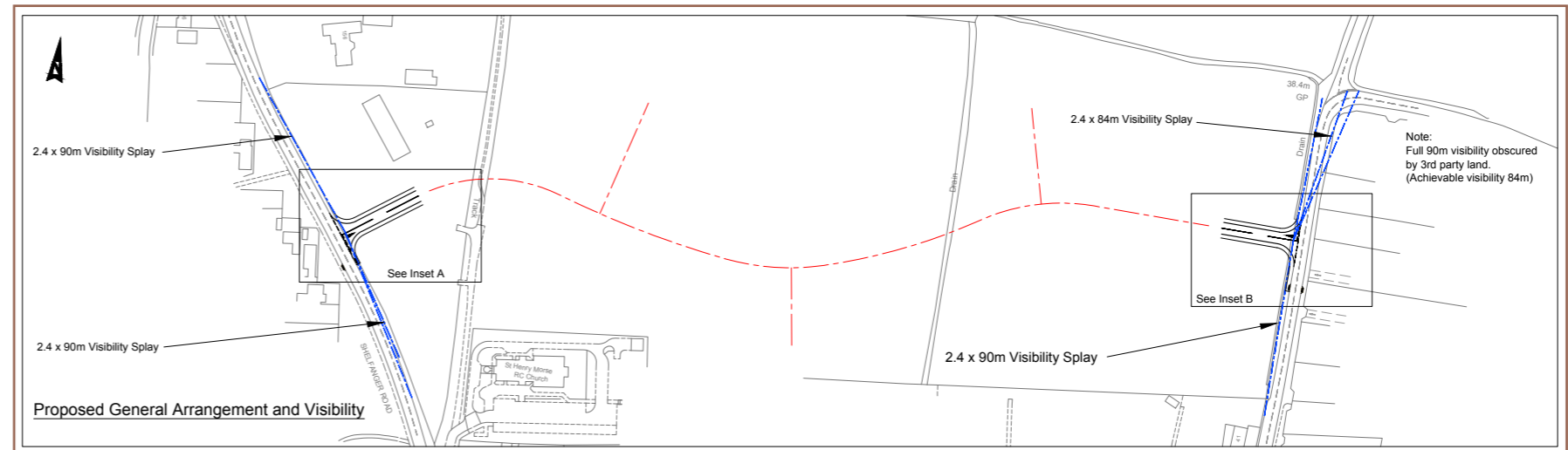
The Access and Movement Plan on page 8 shows the proposals for pedestrian movements into and within the Site.

Public rights of way RB25 and FP7/FP26 currently serve the Site from the north/south and east/west respectively. The routes of these are not proposed to be altered as part of the development, and surfacing improvements can be made as required. As previously stated, 2m footways are also proposed on either side of the Link Road.

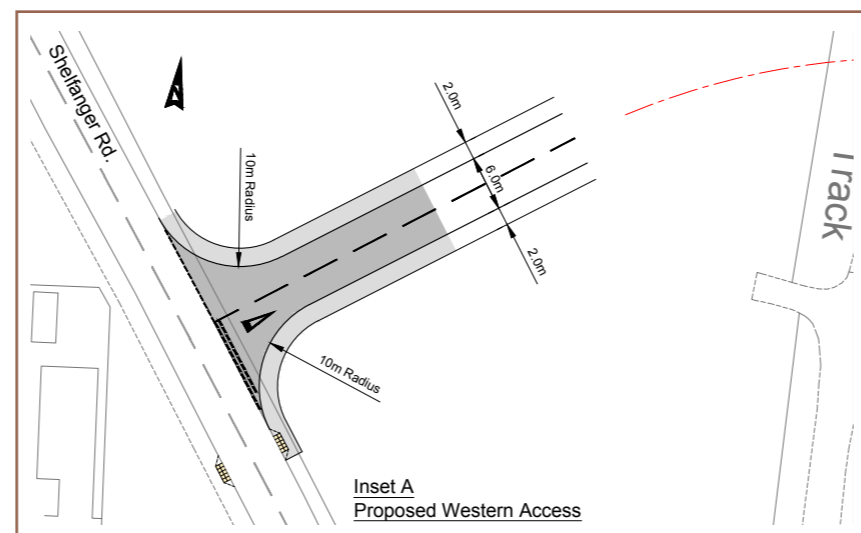
On the Shelfanger Road side a crossing point is proposed to connect into the existing footway on the western side of the road. A more direct pedestrian access into the Site will be available via the upgraded PRoW RB25, which connects to the existing footway at Shelfanger Road / Farthing Close.

On the Heywood Road side two crossing points are proposed to connect into the existing footway on the eastern side of the road; one immediately to the south of the access road and the other towards the south-eastern corner of the Phase 2 area. We do not think it will be possible to deliver a continuous footway link on the western side of Heywood Road - it currently ends at 39 Heywood Road and adding a footway in front of the existing cemetery land would compromise the existing carriageway width.

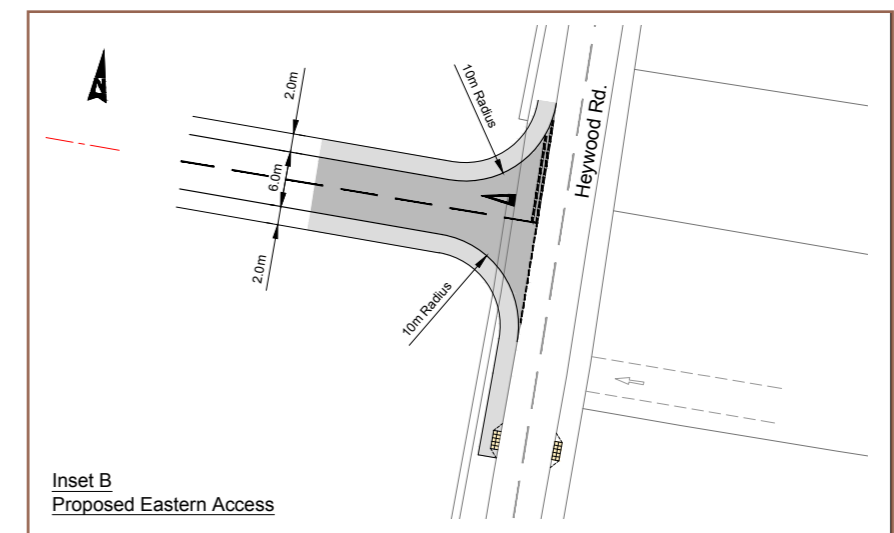
The cemetery extension land is proposed immediately adjacent to the existing Diss Cemetery site, meaning there are numerous opportunities for vehicle and pedestrian links through as required. Whilst not proposed for consideration as part of the Phase 1 application, it is anticipated that an additional pedestrian and/or vehicular access could be delivered from Heywood Road to the cemetery extension land, if considered desirable.



Proposed Link Road between Shelfanger Road and Heywood Road



Shelfanger Road Access Plan



Heywood Road Access Plan





Access and Movement Plan



7. CONSULTATION AND VALIDATION

"The Council has a key role to play in encouraging developers to take maximum advantage of the pre-application stage. There are two main aspects of pre-application. The first is encouraging applicants to engage directly with the local community before submitting their applications to the Council so that local people can have their say about the proposed development before a planning application is submitted and the second is encouraging developers to take up the confidential chargeable pre-application service offered by the Council with the aim of improving the quality of planning applications being prepared for submission."

South Norfolk Statement of Community Involvement (May 2017)

CONSULTATION TO DATE

To date, meetings and discussions have been held with the following parties to discuss the emerging proposals:

- South Norfolk District Council
- The Greater Norwich Local Plan Team
- Norfolk County Council
- Utilities Providers
- Diss Town Council

PLANNED CONSULTATION

Following receipt of the pre-application response, community consultation will be undertaken in accordance with national guidance and the Council's Statement of Community Involvement. Unless the current COVID-19 restrictions have been lifted, it is proposed that this will take the form of an online and postal consultation. Diss residents will be notified of the consultation through a combination of leaflets distributed throughout the town, the Town Council's website and through advertisements in local publications. Scott Properties' telephone and postal details will be provided for those who do not have access to the internet to enable participation in the online consultation. Diss Town Council will also be contacted directly, and Scott Properties will offer to present the proposals at a Town Council meeting.

The consultation will run for a period of two weeks, providing the opportunity to view the proposals, ask questions and provide feedback. Once the consultation is complete, all responses will be analysed, with any appropriate amendments implemented. A Statement of Community Involvement will be prepared to summarise the consultation exercise and feedback received, which will be submitted in support of the planning application.

We would welcome confirmation from Officers that the proposed method of consultation is acceptable in light of the restrictions posed by COVID-19.

ENVIRONMENTAL IMPACT ASSESSMENT

The proposal is considered to be an urban development project and Schedule 2 development under the Regulations. Schedule 3 sets out the criteria to define the circumstances when development proposals are more likely to constitute EIA development. National Planning Policy Guidance advises that only a very small proportion of Schedule 2 development will require an EIA.

In this regard, whilst the site area exceeds the 5 ha threshold set out in the guidance, it is not considered it will have significant urbanising effects as it is a greenfield site delivering substantially fewer than the 1,000 dwelling threshold. Furthermore, the technical work undertaken has not identified any particular environmental sensitivities associated with the Site. It is therefore not considered that the proposal represents EIA development and the application can be screened accordingly. Ahead of the formal submission of a screening request we would welcome confirmation from Officers that they are in general agreement with this initial assessment.

PROPOSED SUBMISSION DOCUMENTS

Based on a review of the Council's validation requirements, we have identified that in addition to national requirements, the following documents will be required in support of the planning application:

- Affordable Housing Statement
- Arboricultural Assessment
- Archaeology Assessment
- Construction Management Principles
- Design and Access Statement
- Ecology Assessment and Protected Species Surveys
- Flood Risk Assessment and Drainage Strategy
- Landscape and Visual Impact Assessment
- Planning Statement
- Statement of Community Involvement
- Sustainability Statement
- Transport Assessment; and
- Travel Plan.

We would be grateful for confirmation from Officers that the above list is correct and complete.



8. CONCLUSION

SUMMARY

We welcome the feedback from Officers in relation to this pre-application submission. It is hoped that this document has demonstrated that this is a highly sustainable and deliverable development proposal that is compliant with the emerging allocation and the broader GNLP policies. It is submitted that this development can deliver a range of significant benefits not just to the local area, but to the District and wider Greater Norwich area as a whole.

ECONOMIC BENEFITS

The proposed (Phase 1) development will bring substantial economic benefits to the local area not only through the construction phase but also through the spending by the new residents, a proportion of which will be captured locally. According to the HBF Housing Calculator, the construction of the dwellings will support the employment of up to 353 people, including 3 positions for apprentices, graduates or trainees. There will also be significant economic benefits to the District Council, as well as the Town Council as mentioned in this document.

SOCIAL BENEFITS

The provision of 38 affordable homes across a range of types and tenures offers a significant social benefit. A proportion of the dwellings are proposed as single-storey properties to respond to an anticipated local need and demand within Diss for housing for older people. The proposed development will also provide opportunities for self and custom build in a popular market town.

The Phase 1 development will extend the capacity of the cemetery to the year 2072, with Phase 2 extending it further to 2085 if delivered as shown in the Illustrative Masterplan. This is in addition to the open space proposed as part of the development, and the improved linkage to the PRow network in the area. The development will also deliver the first part of a new Link Road between Shelfanger Road and Heywood Road, which when completed will help to reduce traffic on Sunnyside which is currently constrained by on-street parking.

ENVIRONMENTAL BENEFITS

The development of the Site provides an excellent opportunity to deliver biodiversity net gain relative to the current intensive farming use. This will be achieved through new habitat creation via a network of green infrastructure corridors within the open spaces and attenuation areas. This can be further enhanced and complemented through targeted on-plot measures to support and encourage biodiversity as part of the detailed design stage.

CONTACT DETAILS

Please contact Scott Properties or Strutt & Parker with any questions relating to the proposals or for clarification of any matter within this pre-application document.

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Ecology Geosphere Environmental
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Utilities: TriConnex
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