

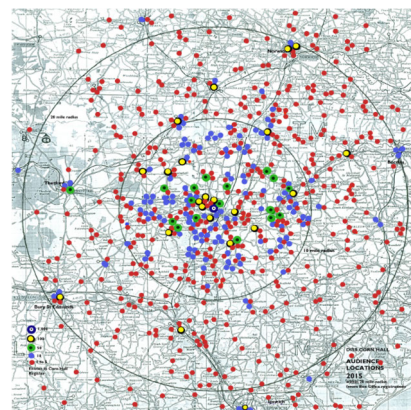
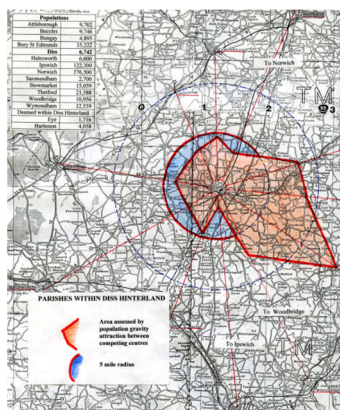
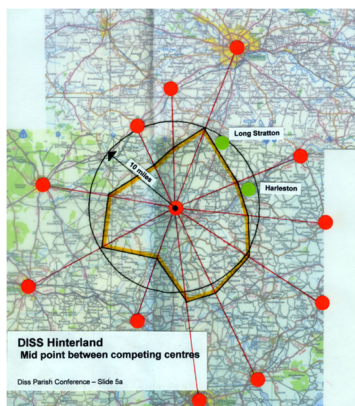
The GREATER NORWICH Regulation 18 Consultation 2020 PROPOSALS FOR DISS

Whatever the merits of the Greater Norwich Local Plan for Norwich there are few for Diss. The clue is in the name. It may stretch credulity to include Long Stratton in Greater Norwich, but the reasons for doing so cannot include Diss, and do not try. The local plan provisions for Diss are in no way recognisable as a creative and workable plan. They are a recipe for the decline of Diss's role and regional centre as a historic market town. Consultation 18 divorces Diss from its essential support settlements and, despite the gnlp political introduction, there are no housing-matching specific plan proposals for new jobs, supporting infrastructure, schools, roads, health care, Proposals and consultation are limited to a bureaucratic scatter of housing sites without context, an exercise in allocating housing numbers simply to achieve a total, leading to added settlement girth within restricted boundaries, a kind of planning obesity, creeping encroachment on agricultural land and a lottery allocation of added wealth for selected peripheral land owners.

WHY DOES THE GNLP (particularly Regulation 18 proposals) FAIL TO LIVE UP TO THE TITLE OF A LOCAL PLAN?

It fails to link Diss to its surrounding support villages. It specifically severs proposals for those settlements from its proposals for Diss, which as a market town relies on its surrounding villages as they rely on Diss. No plan for Diss as a market town commercial and social centre can be relevant if it limits its consideration to its parish boundary and treats surrounding settlements in separate categories of 'Service and 'Other'. These settlements need planning as an essential element of a Greater Diss.

It fails to grant Diss the same growth zone considerations applied for Norwich. Diss may be far smaller than the County capital, but it has its own integral support and growth zone and no Local Plan should ignore that context. Diss parish of some 7,500 has a population hinterland of 50-70,000 dependant on the commercial or social attraction. A simple mid-distance hinterland virtually fills a ten mile circumference, a weighted gravitational assessment on population (2012) in competing centres reduces that hinterland to the north, west and south of Diss to five miles circumference. The audience support for Diss Corn Hall (2015) shows the 'reach' of Diss into the myriad of its surrounding Villages and Hundreds beyond the ten mile circumference. A local plan needs to take this hinterland into consideration and treat it as an integral element of Diss' future.



Hinterland assessments
By travel, at settlement mid-points

By population gravitational weighting

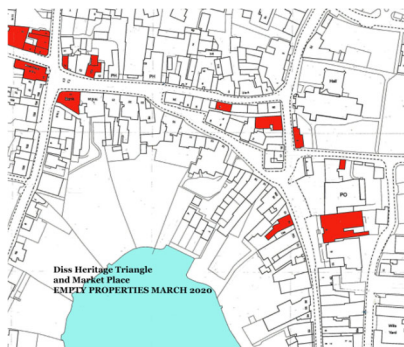
By Corn Hall Audience 2015

It fails to acknowledge that Diss, the sole centre in the County other than Norwich, has a rail station providing a swift link direct to the heart of London's financial centre. This already attracts significant commuter traffic. For 30 years this pattern of home/work commuting has greatly increased, will continue to be a potent urban generator, but has not been built into the parameters guiding the plan.

It claims to relate a confetti allocation of dwelling consents to primary school access, with a child's pedestrian link to a primary schools set as the criterion for a new housing site. But it fails to assess the need and thus location for new Primary Schools. The plan accepts existing catchment areas and assumes the existing schools can accommodate all children from new housing. Or, indeed for any new social services. It is not a plan, it is a housing numbers game.

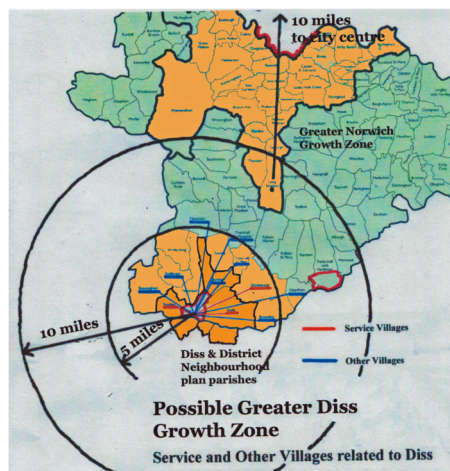
It mentions but fails to resolve the traffic difficulties of Park Road and Victoria Road Diss, ignoring the need and potential for a hinterland bypass link between the A143 and A1066. There are no proposals for infrastructure to support the allocated housing sites, nor analysis that road, water, drainage and communication capacity will be available.

It fails to provide any Action plan or proposals for Diss Town Centre. It has no proposals for the linkage of the Diss Park to the proposed Waveney riverine parkland. It fails to mention the town centre and the increasing number of empty commercial properties let alone attempting to adopt plan policies that will help the centre to survive.



Empty properties in the Diss Heritage Triangle and Market Place. There are further significant vacancies down Mere Street

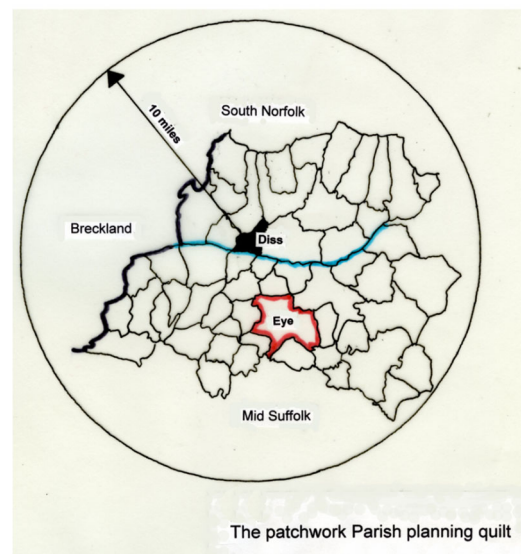
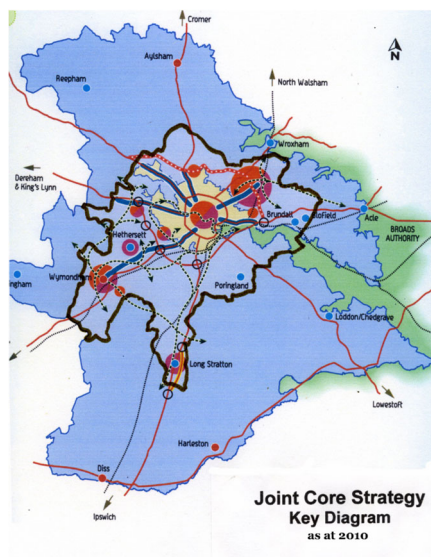
It still continues retail use amongst those approved for Sites DIS 6 & 7, (Committed Sites up to 2018) despite the rejection of retail warehousing use on appeal for Diss 7 and the accepted deleterious impacts retail development that it would have had on existing traders and Diss' historic town centre. The Development Management Committee in refusing consent may have hid behind the fact the site was on the periphery of a conservation area, but the inspector recognised the adverse economic impacts it would have had. This review of the plan should take the opportunity to change the approved uses for committed sites.



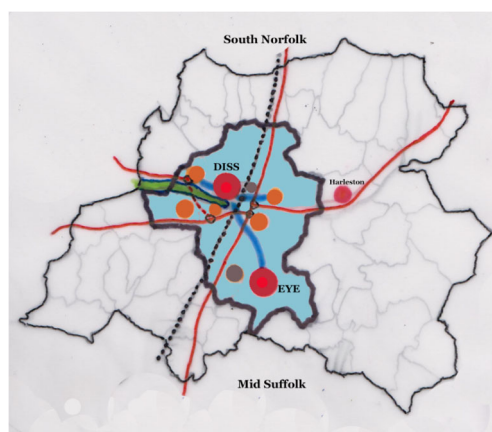
It continues the cult of 'borderism' that has plagued all plans in the past, accepting that plan responsibility ceases at the County boundary and thus fails to acknowledge the Diss Town Council and Mid-Suffolk's efforts to establish a Neighbourhood plan that includes those zones that form part of Diss' hinterland south of the River Waveney. For planning purposes a 'Greater Diss Growth Zone' paralleling the Norwich approach should

include the core parishes of the emerging Neighbourhood plan ... Diss, Roydon, Burston & Shrimpling, Scole, Palgrave, Stutson and Brome and Oakley. This, at least, would provide some logical context for a comprehensive plan that includes housing as but one of its elements.

A POSSIBLE DIFFERENT APPROACH FOR THE DISS AND EYE SPATIAL REGION.



These two diagrams compare the planning base for Greater Norwich as set out in the 2010 Key Diagram from the Joint Core Strategy with that for the south of the District and north Mid-Suffolk. That for Greater Norwich seeks to take into account a broad range of plan elements. That for the south of South Norfolk is a collection of parishes each treated separately and has no planning relevance whatsoever.



Rather than using this parish patchwork as a series of boxes within which to allocate peripheral housing additions to each settlement an extension of the JCS Strategy approach for the Norwich Growth Area would be to attempt a similar consideration of the needs of a planned axis between Diss and Eye. This would entail the establishment of a joint South Norfolk-Mid-Suffolk development and implementation unit, difficult but possible, and would provide for a matching basis of plan consideration across the county boundary. It would also permit a more imaginative and attractive solution to housing provision to include, perhaps, a new high-density yet garden village community.

COMMENTS ON REGULATION 18 ‘PROMOTED SITES’

Housing Sites:

GNLP0342 and 0250

Specific provision should be made at the outset to restrict the housing site area so as to identify, allocate and gift adequate extra land for Diss cemetery and the link road, not leaving these needs contingent on planning conditions.

GNLP0102, 0185 and 1054

It is inappropriate to squeeze housing into the middle of an employment site and adjacent to a railway. The site should remain in employment use. Diss needs more land designated for employment use and a policy to generate new work opportunities.

GNLP0341 (Parish Fields)

A strictly limited number of dwellings might be permitted provided they were designed specially for the site and, as public benefit for the use of land designated as ‘Important Local Open Space to be retained’, the remainder of Parish Fields were deeded over to Diss Town Council and developed as a public park.

GNLP0599, 1044, 1003

None are currently designated for the next plan period, but should they be considered they need to be designed and built as part of a special Walcot Green village design with its own open surrounds, not treated as added Diss girth.

Site Commitments up to 2018

DIS 3

This critical, if small, site on the edge of the A1066 has high visual impact. It may look convenient on a map to complete zoned residential to a straight line, but this is desk-planning with little regard to the actual look and feel of the land. The site needs to revert back to open space so as to emphasise and not diminish the value of the landscape gap between Diss and Roydon and to avoid allotments butting up against housing. A planted woodland strip along the this edge of housing land would be beneficial to the look and character of the town.

DIS 6

Retail use should be deleted from the sui generis approved uses for this site and compulsory purchase made of the ‘ransom’ strip on the ‘Morrison’s internal roundabout so as to allow traffic to access DIS 6 (and the bus station) from the internal Morrison road approach. Provision should be made for a landscape walk connection from the bus station south to DIS 2, to include a walkway strip alongside the electricity sub-station.

DIS 2 & 7

Retail use should be deleted from the sui generis approved uses for DIS 7 and effort made to help relocate the feather factory and to create a landscape connection between the Diss Town Park and DIS 2.

SUMMARY

The GNLP may or may not deliver a sufficient supply of homes for the next plan period. But it fails to do more than generally acknowledge primary criteria under the JCS for future economic, social or environmental objectives and their impacts on Diss and its surrounds. It fails to identify how the proposed number and location of new homes will relate to the Diss of the future. There are no plan specifics to ensure the vitality of the town centre, nor any consideration of how such housing will promote a healthy and safe community. No proposals deal with the need and provision of sustainable transport or high quality communication. There is no recognition of the importance of the rail link, or proposals for better linkage between station and town. The housing provision, site by site, may have associated provisions affecting their layout (no mention is made of design quality) but these remain subsidiary and ancillary to each housing designation, rather than satisfying broader policies. The Local Plan Consultation 18 restricts itself to sites for new housing, lacks a full and realistic context, is devoid of policies to ensure well-designed places or conservation of natural and historic assets and environment and without these fails to meet the requirements set out in the National Planning Policy Framework.