



GREATER NORWICH DRAFT LOCAL PLAN REGULATION 18 CONSULTATION (JANUARY 2020)

Representations on behalf of Pigeon Investment Management Ltd and Thelveton Estate

Land West of Nelson Road, Diss (Part of GNLP1045)

March 2020

Introduction

The following representations have been prepared to the Draft Greater Norwich Local Plan (GNLP) Reg 18 consultation (January 2020) on behalf of Pigeon Investment Management Ltd ('Pigeon') and the Thelveton Estate ('the landowners').

These representations are prepared in support of the allocation of Land west of Nelson Road, Diss (the 'Site') for assisted living homes or new homes. The Site, which comprises part of GNLP1045, presents a significant opportunity to provide new homes (or assisted living homes, which would help meet the residual need for specialist accommodation within the Greater Norwich area) in a highly sustainable location.

The Site could be brought forward independently or in combination with the adjoining land that comprises the balance of GNLP1045 and could be delivered within the first 5 years of the plan period.

A Concept Plan, showing how the Site could be brought forward, including access from Nelson Road, together with a Site Location Plan and a Landownership Plan are included as part of these representations.

The Site

The land west of Nelson Road is approximately 0.56 ha and is located west of existing residential development off Nelson Road/Viscount Close. It comprises vacant/undeveloped land between the Diss Station car park and Nelson Road.

The Site is identified in the draft GNLP as part of site reference GNLP1045 (Land west of Nelson Road and east of Station Road) and could be brought forward independently or in combination with the adjoining land that comprises the balance of GNLP 1045.

Diss has a wide range of existing services and facilities including a secondary school, infant and junior schools, medical centres, an arts centre, a youth and community centre, a leisure centre, numerous retail outlets, pubs and hotels and churches. The town has a railway station on the mainline between Norwich and London and operators provide bus services to Norwich, Bury St Edmunds and other market towns and villages in the surrounding area.

Diss is identified as a Main Town in South Norfolk District. The Town is situated on the Great Eastern Mainline between London and Norwich and close to the A140 route between Ipswich and Norwich.

As such, the Site presents an opportunity to provide new homes in a highly sustainable location in close proximity to existing employment opportunities, or specialist accommodation to help meet the elderly care requirements for the Greater Norwich area.

The Site would be served by a pedestrian/cycle link between Nelson Road and Prince Regent Way and is well placed to encourage walking and cycling in-place of care-based trips. Furthermore, the Site presents the opportunity to provide a link between Nelson Road and the station in accordance with Policy DIS8.

The Site is in close proximity to land north of Nelson Road that has previously been granted planning permission for a 76-bed care home (application ref. 2013/1748) and more recently has been proposed for 82 'extra care' apartments, thereby demonstrating the suitability of Nelson Road for residential and/or care uses.

Accessible and Specialist Accommodation

Policy 5 of the draft GNLP states that proposals should address the need for homes for all sectors of the community having regard to the latest evidence.

The Policy then proceeds to support the delivery of accessible and specialist housing providing they have good access to local services, as is the case for the Land west of Nelson Road.

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.

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.

The identified 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.

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. However, none were built in South Norfolk leaving a residual need for 679. 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.

The Site offers a suitable location for such provision, as evidenced by the 2013 planning permission for land north of Nelson Road, and provides scope to address a significant element of the residual need for bedspaces through the provision of assisted living accommodation.

Planning Policy Context

The draft GNLP identifies site reference GNLP1045 as a 'reasonable alternative' for residential development (in combination with the adjoining land that comprises the balance of GNLP 1045). The principal reason for not allocating GNLP1045 is that it is allocated for employment use under South Norfolk Local Plan policy DIS8.

Whilst it is acknowledged that the allocation of the Site for new homes would not accord with policy DIS8, the above assessment does not take into account the jobs that would be created as part of an assisted living/care scheme. Furthermore, given the Site's location adjacent to existing homes on Nelson Road/Viscount Close, it is considered that the provision of assisted living homes (or new homes) would represent an appropriate use for the Site, ensuring that there is no loss of amenity for the existing homes to the east of the Site.

It is also clear from the evidence in respect of the need for additional bedspaces in residential institutions, that there is a need to allocate sites to meet elderly care requirements within the District. As such, the allocation of the Site for specialist accommodation in the form of assisted living homes represents an opportunity to help to meet this need and would be wholly appropriate in this context.

In respect of new homes, the Site has been identified as a reasonable alternative in the Diss settlement Site Assessments document. With regard to the Site's allocation for employment, it is of note that it has not come forward for such use despite being allocated for employment purposes since 2015, and being the subject of a Development Brief going back to 1990. There has been no interest in the Site for employment purposes during this time, which is in-part due to the availability of large amounts of serviced employment land at Diss Business Park. Furthermore, the size of the Site, and its proximity to existing residential uses, means that it is not suitable for substantial employment provision.

The use of the Site for new homes has also received support in principle from the Town Council, which has indicated that 'residential development would be supported given its proximity to Diss Railway Station'.

In light of the above, and the Site's location in a predominantly residential area, it is considered that the Site should be allocated for new homes and/or assisted living in the GNLP. As a Site of less than 1 hectare, its allocation would help the Councils in meeting the requirement (NPPF paragraph 68a) to identify land to accommodate at least 10% of housing requirements on sites of no larger than one hectare.

Technical Capacity

Highways: The Site would be served from Nelson Road with suitable provision for off-street parking provided within the Site. In respect of assisted living homes, given the nature of the proposed use, the majority of employees would be travelling to work outside of peak hours, therefore there would be no residual cumulative impacts in terms of highway safety or the operational capacity of the surrounding highway network. Furthermore, given the proximity of the station and the Site's location within Diss, it is anticipated that a large number of trips would be via sustainable modes, rather than car-based trips.

Noise and Amenity: The Norwich to London railway line is located to the west of the Site. In order to ensure an appropriate noise environment for future residents, acoustic design measures would be incorporated within the scheme design. Such features would include acoustic windows, building orientation and boundary treatments. These measures would ensure an appropriate acoustic environment for future residents, as has been achieved for the neighbouring residential uses at Nelson Road/Viscount Close.

Utilities and Services: The Site will make best use of the existing infrastructure located within close proximity to the Site. Foul sewerage, potable water, gas, electricity and telecom services are present in the highway network adjacent to or close to the Site. As such, utilities capacity is not anticipated to present a constraint to scheme delivery.

Flood Risk: The Site is located in Flood Zone 1 and therefore at low risk of flooding (less than 0.1% annual probability). Consequently, the Site location meets NPPF sequential requirements of locating development in areas of lowest flood risk.

Conclusion

Land west of Nelson Road (approximately 0.56 ha) is proposed as an allocation for new homes, or assisted living homes to help meet identified needs for specialist accommodation. The Site can be brought forward independently, or in combination with the adjoining Site, which comprises the balance of GNLP1045.

The Site has been identified as a reasonable alternative for residential development in the draft GNLP, with the principal reason for not allocating the Site being its current allocation for employment uses, indicating that the Site is otherwise suitable for allocation.

The Site is suitable for new homes, given its proximity to Diss Station and proximity to existing residential uses at Nelson Road/Viscount Close. Furthermore, the potential to bring the Site forward for assisted living homes would create local employment opportunities, whilst helping to meet specialist accommodation needs within the GNLP area.

There is 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.

The Site offers a suitable location for such provision and provides scope to address a significant element of the residual need for bedspaces through the provision of assisted living homes.

The Site is wholly appropriate for inclusion in the GNLP, being located in a highly sustainable location and has been supported for residential allocation by Diss Town Council.

In light of the above, the Site should be considered for allocation in the emerging Local Plan for new homes or assisted living homes. Pigeon and the Landowners would welcome the opportunity to discuss the delivery of the Site for these uses with officers of the Council.

Appendices

- Nelson Road, Diss – Concept Plan
- Nelson Road, Diss – Location Plan
- Nelson Road, Diss – Land Ownership Plan