



GREATER NORWICH LOCAL PLAN

Stage C Regulation Draft Strategy and Site Allocations

Land between Shelfanger Road and Mount Street (Site Reference GNLP0341)

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

March 2020

Site Name:	Land between Shelfanger Road and Mount Street (Site Reference GNL0341)
Client Name:	M Scott Properties Limited
Type of Report:	Stage C Regulation Draft Strategy and Site Allocations
Prepared by:	Shannon Hubbard
Checked by:	Adam Davies
Date:	March 2020

COPYRIGHT © STRUTT & PARKER. This publication is the sole property of Strutt & Parker and must not be copied, reproduced or transmitted in any form or by any means, either in whole or in part, without the prior written consent of Strutt & Parker. Strutt & Parker does not accept any liability in negligence or otherwise for any loss or damage suffered by any party resulting from reliance on this publication.

Strutt & Parker, 66 – 68 Hills Road, Cambridge, Cambs. CB2 1LA
adam.davies@struttandparker.com
Tel No: 01223 459493

CONTENTS

Draft Greater Norwich Local Plan – Part 1 The Strategy	5
Question 6: Do you support or object to the vision and objectives for Greater Norwich?	5
Question 9: Do you support, object, or have any comments relating to the approach to Housing set out in the Delivery Statement?.....	6
Question 11: Do you support, object, or have any comments relating to the approach to Infrastructure set out in the Delivery Statement?	7
Question 12: Do you support, object, or have any comments relating to the Climate Change Statement?	7
Question 13: Do you agree with the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?.....	7
Question 14: Do you support, object or wish to comment on the approach for housing numbers and delivery?	8
Question 16: Do you support, object or wish to comment on the approach to Review and Five- Year Land Supply?	9
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?.....	9
Question 25: Do you support, object or have any comments relating to the approach to on-site and local infrastructure, services and facilities?.....	10
Question 29: Do you support, object or have any comments relating to the approach to accessible and specialist Housing?	10
Question 41: Do you support or object or wish to comment on the approach for the main towns overall? Please identify particular issues.....	12
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.	12
Greater Norwich Local Plan – Part 2 Site Allocations	13
Policy GNLP0341 Land Between Shelfanger and Mount Street.....	13

Greater Norwich Local Plan

Stage C Regulation 18 Draft Strategy and Site Allocations

Land between Shelfanger Road and Mount Street (Site Reference GNLP0341)

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 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. This response should be read in conjunction with our previous consultation submissions made in respect of Land between Shelfanger Road and Mount Street (Site Reference: GNLP0341), which is proposed as a Reasonable Alternative Allocation in the Draft Local Plan – Part 2 Site Allocations document.
3. The site has been identified as a reasonable alternative, if additional growth is needed in the Main Towns, in the Part 2 Site Allocations Draft Local Plan. The site is centrally located with excellent access to services and facilities, however, it has not been allocated as it is currently identified as an important Open Space in the South Norfolk Local Plan. The Draft Allocations Plan notes that the proposed scheme is for 35 retirement living units and five detached dwellings. The current proposal however is actually for circa 24 single-storey retirement living units with land set aside to facilitate the expansion of the health centre, a masterplan has been prepared by Scott Properties and is included within this representation. The Draft Plan goes on to acknowledge the proposals offer the opportunity to open up and enhance the currently inaccessible site for public access and indicates that this is considered to be worthy of further consideration, if further housing is needed Diss. The Draft Plan notes that overall highways issues limit the scale of growth in Diss and that in the event the site were to be developed it would require the provision of acceptable visibility which may mean the relocation of a utility pole.
4. The site extends to 3.303 ha (7.91 acres). It should however, be noted that the site area is slightly different to that shown on Figure 1 below and is correctly shown on the accompanying Site Location Plan drawing number: 3201 OS A. The difference is where the site extends to Mount Street between numbers 19, 22 and 23 Mount Street.

Greater Norwich Local Plan

Stage C Regulation 18 Draft Strategy and Site Allocations

Land between Shelfanger Road and Mount Street (Site Reference GNL0341)

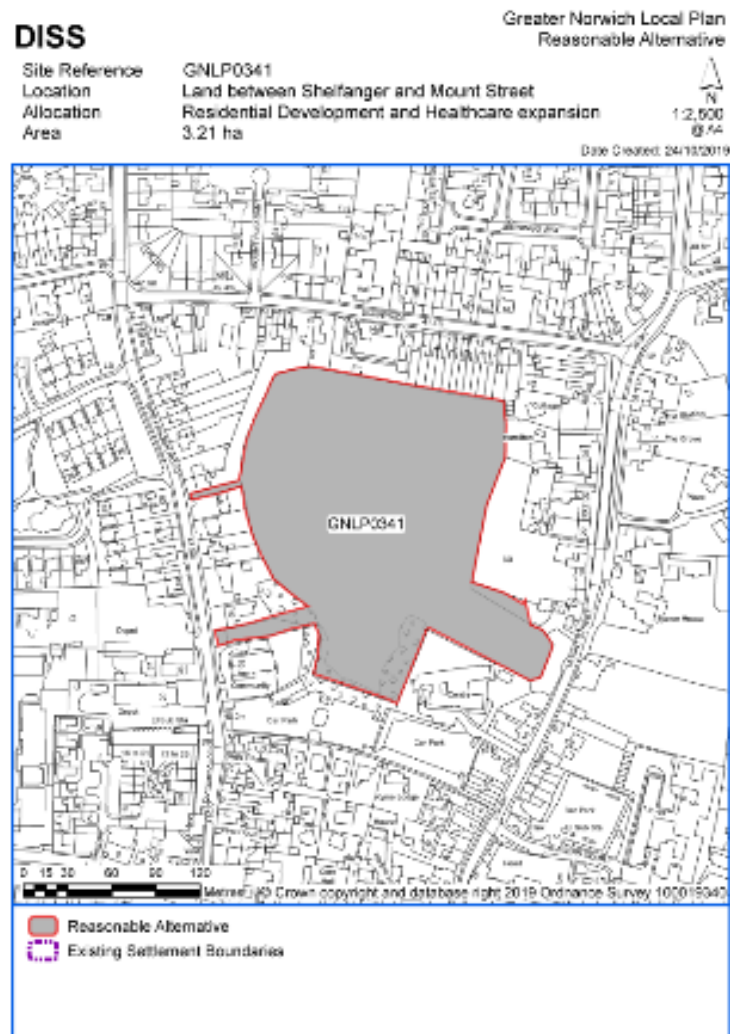


Figure 1: Land between Shelfanger Road and Mount Street

5. Whilst the positive nature of the site assessment is welcomed, we believe the Greater Norwich Local Plan should reconsider this site and include it as an allocation in the Regulation 19 version of the Plan. The site is deliverable, suitable, and achievable and will bring much needed new housing for older people in a central location in Diss along with publicly accessible open space and land to facilitate the expansion of the medical centre.
6. We have set out our response to relevant questions from the Draft Greater Norwich Local Plan – Part 1 The Strategy as follows, having regard of the above site.

Draft Greater Norwich Local Plan – Part 1 The Strategy

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

7. 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

Greater Norwich Local Plan

Stage C Regulation 18 Draft Strategy and Site Allocations

Land between Shelfanger Road and Mount Street (Site Reference GNLP0341)

that a key theme throughout is playing a part in the national commitments to achieving net zero greenhouse gas emissions by 2050.

8. 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.
9. 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)

10. 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 also 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.
11. We believe that our client's site that has been considered as a Reasonable Alternative can help address the visions and objectives for the Greater Norwich. The scheme currently proposed at Land between Shelfanger and Mount Street could provide approximately 24 single-storey dwellings and publicly accessible open space, whilst facilitating the future expansion of the medical centre through a land transfer. Most importantly, the extensive area of new publicly accessible open space will make a positive contribution to the community's health and well-being and can deliver significant biodiversity enhancements.

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

12. 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.
13. 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 c. 25

Greater Norwich Local Plan

Stage C Regulation 18 Draft Strategy and Site Allocations

Land between Shelfanger Road and Mount Street (Site Reference GNL0341)

dwellings (expected delivery from 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. Our client's site, Land between Shelfanger Road and Mount Street (Site Reference: GNL0341), is one such site which should be allocated given its central location in a highly sustainable settlement.

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

14. 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 our 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?

15. 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?

16. 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.
17. 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.
18. 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 both primary schools and secondary schooling as well as the train station.

Greater Norwich Local Plan

Stage C Regulation 18 Draft Strategy and Site Allocations

Land between Shelfanger Road and Mount Street (Site Reference GNLP0341)

19. In addition to the above, the preferred settlement hierarchy follows a typical approach and looks at the different levels of services between places, we support the clustering of villages within the countryside and believe this recognises that in some cases, existing businesses within the villages provide services not only for the village that they are located in, but also for smaller neighbouring settlements which may rely on the services they provide.

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

20. 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, Land between Shelfanger and Mount Street could make a meaningful and positive contribution towards meeting these goals.
21. With regard to the delivery of new housing, the Greater Norwich Local Plan'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 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, as outlined above, 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.
22. It is acknowledged that the Plan aims to comply with paragraph 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,

Greater Norwich Local Plan

Stage C Regulation 18 Draft Strategy and Site Allocations

Land between Shelfanger Road and Mount Street (Site Reference GNLP0341)

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 achievable it will be. 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 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, stating that a review will be undertaken within five years after adoption or in the event housing delivery, 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 18: Do you support, object or have any comments relating to the preferred approach to sustainable communities including the requirement for a sustainability statement?

30. 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?

31. 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.’

32. This approach is supported by our client and as proposed at their site, Land between Shelfanger Road and Mount Street (Site Reference: GNLP0341) there would be considerable community benefits from the provision of land to facilitate the expansion of the medical centre and the enhancements and public accessibility of a large area of open space.
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.

Question 29: Do you support, object or have any comments relating to the approach to accessible and specialist Housing?

34. The Draft Strategy acknowledges at paragraph 245 that an increasing proportion of the population is over 65 or disabled, increasing the demand for supported accommodation. The Plan seeks to assist Norfolk County Council’s aim to *‘reduce residential care home and nursing home dependency and support people to remain more independent in their own homes or in supportive housing’*.
35. This approach is supported in both National Policy and Planning Practice Guidance (PPG). In particular the ‘Housing for Older and Disabled People’ PPG, which requires plan makers to consider the diverse needs of older people, including those approaching retirement. The PPG also states that *‘Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people’* (Paragraph: 006 Reference ID: 63-006-20190626). We support the Draft Strategy’s recognition of the need to provide suitable homes in the right locations. A lack of availability of suitable accommodation forces people to move away from friends and family to find a property more suited to their needs, or, to make costly adaptations to their own homes.
36. In order to ensure an adequate provision of specialist housing, Scott Properties believe that Policy 5 – Homes should encourage a range of properties to suit a variety of needs, and specific allocations or requirements within site specific policies should be made for specialist housing, and portions of allocations such as Land between Shelfanger and Mount Street, Diss should be set aside for specialist housing. This will ensure that a varied type of housing can come forward to meet the diverse needs of older people as set out in PPG and provide choice for those in later life, which can include:
- Age-restricted general market housing

Greater Norwich Local Plan

Stage C Regulation 18 Draft Strategy and Site Allocations

Land between Shelfanger Road and Mount Street (Site Reference GNLP0341)

- Retirement living or sheltered housing
 - Extra care housing or housing-with-care
37. To ensure a variety of the housing, as identified within PPG above is delivered within Greater Norwich, the Plan should make specific allocations as opposed to just a generic housing mix policy that requires a diverse mix of housing. General housebuilders do not build specialist housing, and by providing housing that is deemed as suitable for older people that is also available to the general housing market does not address the varied and diverse needs of older people, or those with a disability.
38. We would draw attention to the recent interim findings of the Inspector following the examination of the Suffolk Coastal Local Plan, which states:
- 'The Plan as submitted seeks to address the needs of older people through Policy SCLP5.8 Housing Mix. The Policy however, whilst supporting the provision of housing for older people, does not address clearly the significant need identified and would not be effective in delivering the market or affordable housing units for older people required. The Policy and supporting text should be amended to set out how the housing needs of older people will be addressed through the provision of housing and to boost the supply of this type of housing.'*
39. We would therefore encourage the Council to consider the merits of allocating specific sites for specialist accommodation within the Greater Norwich Local Plan. It is vitally important that suitable housing is provided to meet the needs of an ageing population.
40. Approximately 24 single-storey properties specifically designed for those aged 55 and over as well as those with or supporting someone with a disability are proposed at Land between Shelfanger and Mount Street, Diss (as shown on the accompanying indicative masterplan). Providing this type of accommodation in a central town location, allows people to move to a property better suited to their current or future needs, whilst remaining close to friends and family.
41. At present, the retirement housing market is dominated by a handful of providers who typically produce flatted developments within town centres for those approaching the later years of their lives (predominantly 75+ years of age). This results in a lack of choice and highly inflated prices for those aged 75+, who are looking to move to a property more suited to their current or future needs but also wish to remain close to friends and family. Needless to say, the couples and individuals who are of the 60-75 age bracket are left with no alternative housing option, other than making costly adaptations to their existing property.
42. Extensive research has shown a number of benefits arising from the provision of suitable specialist accommodation for the older population. The lack of suitable alternative and attractive accommodation acts as a significant barrier to down-sizing for the over 55s. Providing such accommodation will facilitate the release of under-occupied housing through downsizing. This will free up more housing in the locality for families, thus reducing the pressures on the local authority to make provisions for additional housing and costly adaptations to their existing housing stock.

Greater Norwich Local Plan

Stage C Regulation 18 Draft Strategy and Site Allocations

Land between Shelfanger Road and Mount Street (Site Reference GNLP0341)

43. The proposed development could make contribution to not only accessible and specialist housing but also much need affordable and market housing within the Greater Norwich area in a sustainable location. As such we consider the GNLP should reconsider our client's site Land between Shelfanger and Mount Street, Diss and include it as an allocation in the Regulation 19 Draft Plan.

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

44. 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 approach, although given the dispersed nature of the settlements consider that a more ambitious level of growth should 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.
45. The Main Towns are considered to be sustainable locations that are suitable to accommodate additional growth to contribute to the overall Plan area's housing need. 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. The draft plan identifies sites for approximately 14% of new housing in the main towns. It acknowledges that much of the proposed development has planning permission and there are significant commitments in the main towns, especially in Long Stratton and Wymondham. More capacity for new allocations is available in Aylsham, Diss (with part of Roydon), Harleston and with Wymondham. The 14% proportion of new housing could be increased as a large number of reasonable alternative sites have been proposed in the main towns.
46. Our clients would strongly encourage the Greater Norwich Local Plan to increase the number of new allocations in these towns. The NPPF challenges local authorities to support the Government's objective of significantly boosting the supply of new homes and ensure there is a sufficient amount and variety of land which can come forward where it is needed. This also applies to the needs of groups with specific housing requirements such as the elderly. We would therefore encourage the GNLP to review the reasonable alternative sites which have been proposed and bring forward a greater number of new allocations. Our client's site, Land between Shelfanger and Mount Street, Diss, is one such reasonable alternative which could deliver, albeit a modest number, 24 retirement units in a central location along with other significant community benefits.

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.

47. 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

Greater Norwich Local Plan

Stage C Regulation 18 Draft Strategy and Site Allocations

Land between Shelfanger Road and Mount Street (Site Reference GNLP0341)

districts. They have been identified for lower levels of growth than Long Stratton and Wymondham. As such we strongly support the proposed new allocations in these towns which will help these rural 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 particular, as set out in our response to question 41 above, we would encourage the Greater Norwich Local Plan to revisit the Reasonable Alternative sites which have been proposed and bring forward a greater number of new allocations. Our client's site, Land between Shelfanger and Mount Street, Diss, is one such Reasonable Alternative which could deliver, albeit a modest number, 24 retirement units in a central location along with other community benefits.

Greater Norwich Local Plan – Part 2 Site Allocations

48. Below is set out our response to relevant questions from the Draft Local Plan – Part 2 Site Allocations. This sets out the Preferred Allocations and Reasonable Alternatives along with the respective draft policies for the new housing and employment sites

Policy GNLP0341 Land Between Shelfanger and Mount Street

49. Scott Properties' site, known as Land Between Shelfanger and Mount Street has been considered under Site reference GNLP0341 and is currently identified as a 'Reasonable Alternative Site'. The reasonable alternative sites in the Draft Greater Norwich Local Plan Sites Document are those that are '*not currently preferred for allocation but which could have merit if additional numbers are needed or the preferred sites cannot be delivered for any reason*'.
50. The site forms approximately 3.21 hectares of undeveloped land between Shelfanger Road and Mount Street, the wider site is known locally as 'Diss Lawns' and 'Parish Fields'. Residential properties with rear gardens back onto the remaining site boundaries. The entire site is allocated within the currently adopted South Norfolk Local Plan as an Important Local Open Space with a historic association with 60 Mount Street. Despite this, the land is in private ownership and there is no public access available to the site.
51. The Draft GNLP Sites Document outlines the reason for not allocating the site as follows:
- "This site is considered to be a reasonable alternative if additional growth is needed in the towns, as it is centrally located with good access to services and facilities. It is not preferred for allocation at the current time as it is identified as an important open space in the South Norfolk Local Plan but as the proposed scheme suggests a small number of residential units and opening up and enhancing the currently inaccessible site for public access it is considered to be worthy of further consideration if further housing is needed in Diss. Any allocation would be subject to provision of acceptable visibility, which may require relocation of a utility pole. Overall, highways issues limit the scale of growth in Diss."*
52. Whilst the positivity of the site assessment is welcomed it is disappointing that the site is not a proposed allocation. The commentary notes that the site is centrally located with

Greater Norwich Local Plan

Stage C Regulation 18 Draft Strategy and Site Allocations

Land between Shelfanger Road and Mount Street (Site Reference GNLP0341)

good access to services and facilities and that development in Diss is limited due to highways issues. The modest development of 24 retirement living units would have a very limited impact on traffic in Diss. Notably as retirement units are proposed any traffic movements would be more likely to occur outside of the AM and PM peak hours and be at a reduced frequency. The development of the site would also enable the opening up of the site for public access, enhancing the value of the open space and increasing the biodiversity value of the land would be a significant benefit to the residents of Diss.

53. It is our contention that additional growth should be accommodated in the Main Towns within the proposed Local Plan period, and as such, sites such as this should be allocated to allow for this anticipated additional growth (see responses to Questions 9, 14, 41 and 42 above). Furthermore, there is a need to identify sites to meet the needs of an ageing population and more sites like our clients site need to be allocated to cater for this particular demographic need (see our response to Question 29 above). The site is also considered to be the most centrally located site to have been put forward for consideration for development within Diss and as such has to be considered a highly sustainable location and will reduce the risks of coalescence.
54. As outlined within our previously submitted consultation response, the Local Planning Authority will need to consider the site's existing designation as an 'Important Local Open Space'. Currently, there is no public access to the space, and due to the site's enclosure by the surrounding land uses, its contribution to visual amenity is not significant. It is normal for areas of land designated as open space to have a demonstrable public value that is often associated with a sporting or recreational use that provides the area with a more significant visual amenity role.
55. As can be seen below from the South Norfolk Local Plan Inset Map, the central part of the town contains a significant proportion of open space designations.

Greater Norwich Local Plan

Stage C Regulation 18 Draft Strategy and Site Allocations

Land between Shelfanger Road and Mount Street (Site Reference GNLP0341)

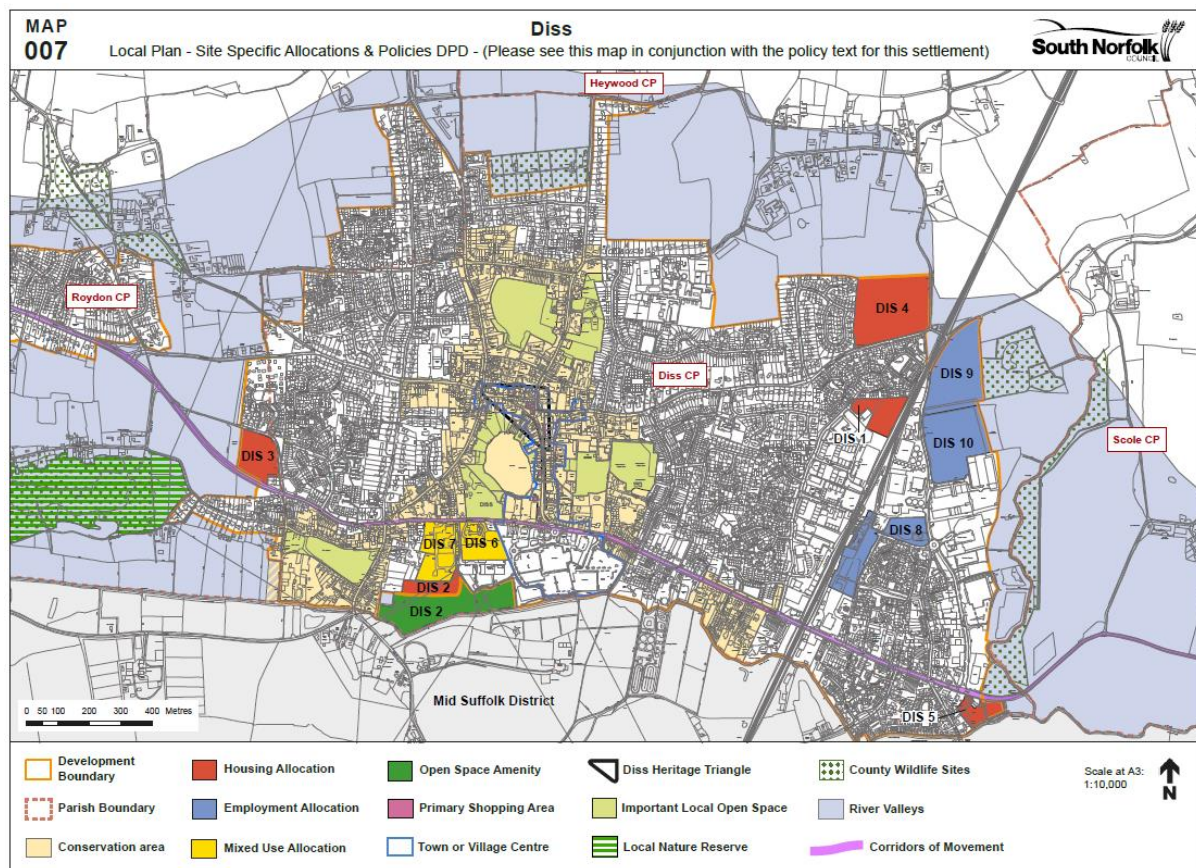


Figure 2: South Norfolk Local Plan Inset Map – Diss

56. Whilst the current proposal at the site would result in a minor quantitative reduction in overall amount of open space in the town, in terms of a qualitative assessment, it would provide significant public benefits, especially by enabling public access to at least 50% of the existing area.
57. Further to the above, Scott Properties has prepared a scheme for the site that would see it developed for a modest development of 24 retirement bungalows, in a sensitive landscape setting whilst also enabling public access that is not currently available to a site that is considered an important local space. The development of 24 single storey dwellings would equate to the development of 45% of the site and will fulfil a specific housing need that is not being met by other sites proposed for allocation within Diss.
58. The development would also potentially allow residents to downsize and introduce a compatible built form which would respect the existing landscape features. It would also allow for a positive natural surveillance of the new publicly accessible space. In respect of the impact of the development on adjoining residential properties, being single story bungalows any adverse impacts through overshadowing or overlooking would be minimal.
59. The modest scale of development proposed in such a sustainable location, would also comply with the spirit of paragraph 68 of the NPPF which acknowledges the contribution that small and medium sized sites can play in meeting the housing requirement of an area. It is noted that the two new proposed allocations are for much larger sites of 200 homes, therefore the inclusion of this site would provide the plan with greater flexibility,

Greater Norwich Local Plan

Stage C Regulation 18 Draft Strategy and Site Allocations

Land between Shelfanger Road and Mount Street (Site Reference GNLP0341)

noting that sites DIS1 and DIS2 were allocated in 2015 and are yet to be developed. Furthermore, the development of retirement living units would make an important contribution to meeting the needs of the ageing population. This proposed allocation represents truly sustainable development with significant social and environmental benefits.

60. Scott Properties has discussed their proposals with Diss Town Council, Diss and District Neighbourhood Plan Steering Group and the local community through a public consultation event in July 2019, and listened to their feedback. As noted in the Town Council's consultation response, there has been a lot of local objection to the proposals on environmental grounds, however, this does not acknowledge that the site is currently in private ownership with no public access and as such the owners have a free hand over its future agricultural use and management. Furthermore, Scott Properties has been working with Natural England on the steering group for the Developing with Nature Toolkit for small and medium sizes sites, and early indications show that a significant increase in biodiversity net gain (20%+) could be achieved through sensitive development of the site alongside targeted new habitat creation.
61. The site is in a single ownership, it is therefore achievable as there are no complex land ownerships or legal issues to compromise its ability to come forward for development. It is available now and would represent a realistic and deliverable development in the current market conditions.
62. It is noted that the Plan seeks to avoid the coalescence of this with the nearby villages, particularly Roydon to the west. Furthermore, the Frenze Valley landscape to the east and south-east marks the administrative boundary with mid Suffolk and is highly sensitive. As such the scope for expansion of the town is stated to be constrained. However, Diss has a full range of services and facilities including a railway station and as such is a sustainable location for growth and as set out above in our response to Questions 9, 14, 41 and 42 above the Local Plan should be aspirational to ensure it is identifying a sufficient amount of land to significantly boost the supply of homes.
63. In respect of the sites allocation we would suggest that a new policy along the following lines be included in the regulation 19 version plan:

Policy GNLP0341 Land between Shelfanger Road and Mount Street, Diss (approx. 3.20 hectares) is allocated for up to 24 older persons housing units of which 33% will be affordable, public open space and land for community use.

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

- Provision of at 50% of the site area as publically accessible open space.
- Provision of a landscape masterplan and management strategy to facilitate public access of the open space.
- Transfer of land at nil cost to facilitate an extension to the medical centre.
- The trees, hedgerows and important landscape features within the site to be retained.
- The historic wall along the Mount Street frontage to be restored and repaired.

Greater Norwich Local Plan

Stage C Regulation 18 Draft Strategy and Site Allocations

Land between Shelfanger Road and Mount Street (Site Reference GNLP0341)

- Highway access to be provided from Shelfanger Road with appropriate visibility splays.
- Pedestrian access to be provided through the site linking Mount Street to Shelfanger Road.
- Development to deliver net gains in biodiversity.
- Historic environment record to be consulted to determine any need for archaeological surveys prior to development.

64. We believe that the Greater Norwich Local Plan should reconsider this site and include it as an allocation in the Regulation 19 version of the Plan. The site is deliverable, suitable, and achievable and will bring much needed new housing for older people in a central location in Diss.