

<b>Settlement Name:</b>	<b>Diss (including parts of Roydon and Heywood parishes)</b>
<b>Settlement Hierarchy:</b>	<p>Diss is identified as a Main Town in the Greater Norwich Local Plan, with a wide range of services and facilities available. The town is located to the north west of the junction of the A140 and A143 and is on the main Norwich-Ipswich-London rail line. As such, the town is well located for new development, subject to the constraints identified below. In addition to having a good range of shops and facilities in the town centre, there is a concentration of commercial and industrial businesses to the east of the town (located either side of the railway), with further land allocated for expansion. Further afield, approximately three miles from the town, near Eye, is the Mid Suffolk Business Park which also offers significant employment opportunities.</p> <p>There are particular vehicular pressures on the A1066 Victoria Road and B1077 Denmark Street as they pass through the town, with congestion considered a barrier to significant growth. There is an attractive historic town centre within an extensive conservation area, that extends to Sunnyside at the north and Park Road to the south. The historic core of Diss is formed by the Market Place, Market Hill, and St Nicholas Street and the town includes an exceptional concentration of listed buildings. A number of open spaces are located within the heart of the town, including The Mere and adjacent park, as well as private open land that contributes significantly to the character and which are protected as Important Local Open Spaces.</p> <p>In terms of the environmental and landscape considerations, the River Waveney is to the south and the Frenze Valley landscape lies to the east and southeast; the former marks the administrative boundary with Mid-Suffolk and Suffolk County Council and the latter including a string of County Wildlife Sites. The plan seeks to avoid the coalescence of Diss with the nearby villages, particularly Roydon to the west. As such, the scope for expansion of the town through this plan is constrained. In terms of new housing, amongst the schemes currently under construction is the DIS 4 allocation on Frenze Hall Lane.</p> <p>In 2018 early consultations took place on the Diss &amp; District Neighbourhood Plan. The proposed Diss &amp; District Neighbourhood Plan is a cross boundary plan covering parishes located within both the South Norfolk and Mid-Suffolk districts. The parishes included in the production of the Neighbourhood Plan are: Brome and Oakley, Burston and Shimpling, Diss, Palgrave, Roydon, Scole and Stuston.</p>

	<p>At the base date of the plan there are three carried forward allocations providing for 87 new homes and a total of 256 additional dwellings with planning permission.</p> <p>Early work in the Towards a Strategy document identifies Diss as a Town (together with Aylsham, Harleston, Long Stratton and Wymondham) and suggests that circa 900 – 1000+ additional homes should be provided between them. This site assessment booklet looks in detail at the sites promoted in Diss to determine which are the most suitable to contribute towards the overall allocation figure for the Towns.</p>
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**PART 1 - ASSESSMENTS OF SITES INCLUDED IN THE DRAFT LOCAL PLAN REGULATION 18C CONSULTATION (JANUARY – MARCH 2020)**

**STAGE 1 – COMPLETE LIST OF SITES PROMOTED IN THE SETTLEMENT**

**LIST OF SITES TO BE CONSIDERED FOR RESIDENTIAL/MIXED USE ALLOCATION (0.5 HECTARES OR LARGER)**

<b>Address</b>	<b>Site Reference</b>	<b>Area (ha)</b>	<b>Proposal</b>
<b>Diss</b>			
Frontier Agriculture Ltd, Sandy Lane	GNLP0102	3.61	Residential (Unspecified Number)
Land to the South of Prince William Way	GNLP0185	1.01	Residential (Unspecified Number)
Land at Heywood Road	GNLP0250	3.00	Residential (Unspecified Number)
Land between Shelfanger Road and Mount Street	GNLP0341	3.21	35 retirement living units, 5 detached dwellings, and land set aside for future Health Centre expansion.
Land East of Shelfanger Road	GNLP0342	4.76	Approx. 100 dwellings and open space.
Land off Walcot Road, Walcot Green	GNLP0599	3.29	Residential (Unspecified Number)
The Grange, Walcot Green	GNLP1003	2.02	Residential (Unspecified Number)
Land North of Frenze Hall Lane and West of Walcot Green	GNLP1044	10.95	Residential (Unspecified Number)

Land West of Nelson Road and East of Station Road	GNLP1045	0.94	Residential (Unspecified Number)
<b>Heywood</b>			
Boundary Farm, Shelfanger Road	GNLP0606	3.00	Residential (Unspecified Number)
<b>Roydon</b>			
156 Shelfanger Road	GNLP0119	0.68	Residential development (Unspecified number)
Land north of Shelfanger Road	GNLP0291	0.93	Residential development of up to 33 dwellings
Land at Sturgeons Farm, off Farm Close, Louie's Lane, Shelfanger Road	GNLP0362	13.81	Residential use mixed-led development of approx. 413 dwellings
Land North of Brewer Green Lane	GNLP1038	1.06	Residential development of approx. 8 – 12 dwellings
West of Shelfanger Road (Part in Roydon, part in Heywood)	GNLP2104	49.00	Residential (Unspecified Number)
<b>Total area of land</b>		<b>101.27</b>	

**LIST OF SITES TO BE CONSIDERED AS SETTLEMENT BOUNDARY EXTENSIONS (SETTLEMENT BOUNDARY PROPOSALS AND SITES LESS THAN 0.5 HECTARES)**

<b>Address</b>	<b>Site Reference</b>	<b>Area (ha)</b>	<b>Proposal</b>
<b>Diss</b>			
Land at Frenze Hall Lane	GNLP0112	0.23	Residential (Unspecified Number)
<b>Roydon</b>			
Land at Sandstone Way	GNLP0104	0.48	Residential development (Unspecified number)

(Sites of less than 0.5ha are not considered suitable for allocation and therefore have not been assessed in this booklet. These sites will be considered as part of a reappraisal of settlement boundaries to be published with the Regulation 19 Submission version of the Plan).

## LIST OF SITES SUBMITTED FOR OTHER USES

Address	Site Reference	Area (ha)	Proposal
<b>Diss</b>			
Victoria Road	GNLP2067	0.42	Commercial

(Sites submitted for other uses are considered in separate 'Non-Residential' Site Assessment booklets and therefore have not been assessed in this booklet).

## STAGE 2 – HELAA COMPARISON TABLE

### RESIDENTIAL/MIXED USE

	Categories													
	Site access	Access to services	Utilities Capacity	Utilities Infrastructure	Contamination/ ground stability	Flood Risk	Market attractiveness	Significant landscapes	Sensitive townscapes	Biodiversity & Geodiversity	Historic environment	Open Space and GI	Transport & Roads	Compatibility with neighbouring uses
Site Reference														
<b>Diss</b>														
GNLP0102	Amber	Green	Amber	Green	Amber	Amber	Green	Green	Green	Amber	Green	Green	Green	Amber
GNLP0185	Green	Green	Amber	Green	Green	Amber	Green	Green	Green	Green	Green	Green	Green	Amber
GNLP0250	Amber	Green	Amber	Green	Green	Green	Green	Amber	Green	Amber	Green	Green	Amber	Green
GNLP0341	Amber	Green	Amber	Green	Green	Amber	Green	Green	Amber	Amber	Amber	Red	Green	Green
GNLP0342	Amber	Green	Amber	Green	Green	Green	Green	Amber	Green	Amber	Green	Green	Amber	Green
GNLP0599	Green	Green	Amber	Green	Green	Green	Green	Amber	Amber	Green	Amber	Green	Amber	Green
GNLP1003	Red	Amber	Amber	Green	Green	Green	Green	Green	Amber	Amber	Amber	Green	Amber	Green
GNLP1044	Amber	Green	Amber	Amber	Green	Amber	Green	Amber	Amber	Amber	Amber	Green	Red	Amber
GNLP1045	Green	Green	Amber	Green	Amber	Amber	Amber	Green	Green	Green	Green	Green	Green	Amber
<b>Heywood</b>														
GNLP0606	Amber	Green	Amber	Green	Green	Amber	Green	Green	Green	Amber	Green	Green	Amber	Green

**Roydon**

GNLP0119	Amber	Green	Green	Green	Green	Amber	Green	Amber	Green	Amber	Green	Green	Amber	Green
GNLP0291	Amber	Green	Green	Green	Green	Amber	Green	Amber	Green	Amber	Green	Green	Amber	Green
GNLP0362	Amber	Green	Amber	Green	Green	Amber	Green	Amber	Green	Amber	Green	Green	Amber	Green
GNLP1038	Amber	Green	Amber	Amber	Green	Amber	Amber	Green	Amber	Amber	Amber	Green	Amber	Amber
GNLP2104	Amber	Amber	Green	Green	Green	Amber	Green	Green	Amber	Amber	Amber	Green	Amber	Green

**STAGE 3 – SUMMARY OF CONSULTATION COMMENTS FROM THE  
REGULATION 18 STAGE A & B CONSULTATIONS**

Site Reference	Comments
<b>Diss</b>	
GNLP0102	<p><b>General comments</b> Site is in the middle of Diss' Strategic Employment site and to be designed for business development only.</p> <p><b>Diss Town Council</b> Inclusion of this and any adjoining sites is considered premature and prejudicial to the Diss &amp; District Neighbourhood Plan which would seek to allocate sites across the NP Area. We comment on this site without prejudice to the above and our comment on this specific site is that the Town Council previously recommended refusal of a planning application for residential use of this site on the grounds of the significant highways impact of this development, the loss of employment land and the lack of sustainability.</p>
GNLP0185	<p><b>General comments</b> Object to building on Parish Field. Leave some green in Diss. Don't be greedy.</p> <p><b>Diss Town Council</b> Inclusion of this and any adjoining sites is considered premature and prejudicial to the Diss &amp; District Neighbourhood Plan which would seek to allocate sites across the NP Area. We comment on this site without prejudice to the above and our comment on this specific site is that this site is considered acceptable for housing development.</p>
GNLP0250	<p><b>General comments</b> One objection raised concerns regarding scale of development, growth of Diss and creation of pressure on local amenities. Other issues include traffic congestion and concerns it will change the landscape.</p> <p>Comment raised in support of site on the grounds the site is the most suitable as they border a road that could be upgraded to become a North Relief Road. A proportion of this land would be needed to expand the Cemetery.</p> <p><b>Diss Town Council</b> Inclusion of this and any adjoining sites is considered premature and prejudicial to the Diss &amp; District Neighbourhood Plan which would seek to allocate sites across the NP Area. We comment on this site without prejudice to the above and our comment on this specific site is if this site was considered in conjunction with site GNLP0119, 0291 &amp; 0342, with additional land allowed for expansion of Diss Cemetery and a direct link road between Heywood Road, Shelfanger Road and Louie's Lane, then this site would be supported.</p>

GNLP0341	<p><b>General comments</b>  Objections raised regarding potential development. This is a popular green space that is well used throughout the year and should be protected for wildlife and recreation. Rather than reducing its size every effort should be made to improve and protect it from encroaching development. Some support for potential extension to the health centre.</p> <p>Comments submitted in support of site. The site is considered suitable for development as it will address the housing needs of older people and allow for expansion and improvement of the medical centre. Additional information was submitted during stage B consultation.</p> <p><b>Norfolk Wildlife Trust comments</b>  This is an area of green space, which we understand is currently protected, as Local Open Space in the Local Plan and listed as a landscape park in Norfolk heritage record. This area is also likely to have local biodiversity value and could be considered as Priority Habitat Wood-pasture and Parkland, as referenced in the NERC Act and NPPF. In addition, veteran trees may be present on site. In our view, owing to biodiversity constraints and the fact that this area contributes to the green infrastructure of the town, this site should not be allocated.</p> <p><b>Diss Town Council comments</b>  Inclusion of this and any adjoining sites is considered premature and prejudicial to the Diss &amp; District Neighbourhood Plan which would seek to allocate sites across the NP Area. We comment on this site without prejudice to the above and our comment on this specific site is that we accept that this is land in private ownership but it is considered unsuitable for large scale housing / commercial development. A possible extension to the health centre would be supported.</p>
GNLP0342	<p><b>General comments</b>  Objections raised regarding potential development. This is a popular green space that is well used throughout the year and should be protected for wildlife and recreation. Rather than reducing its size every effort should be made to improve and protect it from encroaching development.</p> <p>Comments submitted in support of site. The site is considered suitable for development however, a portion of this land should be considered for the expansion of the cemetery.</p> <p><b>Diss Town Council comments</b></p>



	<p>Inclusion of this and any adjoining sites is considered premature and prejudicial to the Diss &amp; District Neighbourhood Plan which would seek to allocate sites across the NP Area. We comment on this site without prejudice to the above and our comment on this specific site is that if these sites were considered in conjunction with site GNLP0250 (east of GNLP0342), with additional land allowed for expansion of Diss Cemetery and a direct link road between Heywood Road, Shelfanger Road and Louie's Lane, then these sites would be supported.</p>
GNLP0599	<p><b>General comments</b> One objection raised as this site is one of the few areas of open 'greenfield' land left in Diss.</p> <p><b>Diss Town Council comments</b> Inclusion of this and any adjoining sites is considered premature and prejudicial to the Diss &amp; District Neighbourhood Plan which would seek to allocate sites across the NP Area. We comment on this site without prejudice to the above and our comment on this specific site is that without major improvements to infrastructure and the local road network, development of this land for residential could not be supported. Current adjacent development at Frenze Hall Lane has exacerbated issues with the local road network and resulted in the formation of a local residents group to campaign for better infrastructure.</p>
GNLP1003	<p><b>General comments</b> Comments submitted in support of site. The site is considered suitable for development as it will have no impact on traffic levels in the village.</p> <p><b>Norfolk Wildlife Trust comments</b> We support the recognition that constraints regarding to biodiversity need to be addressed.</p> <p><b>Diss Town Council comments</b> Inclusion of this and any adjoining sites is considered premature and prejudicial to the Diss &amp; District Neighbourhood Plan which would seek to allocate sites across the NP Area. We comment on this site without prejudice to the above and our comment on this specific site is that without major improvements to infrastructure and the local road network, development of this land for residential could not be supported. Current adjacent development at Frenze Hall Lane has exacerbated issues with the local road network and resulted in the formation of a local residents group to campaign for better infrastructure.</p>
GNLP1044	<p><b>General comments</b> Comments submitted in support of site. The Ordnance Survey extract submitted with the completed call for sites form (on 4th July 2017)</p>

	<p>identified (albeit indicatively) a potential new highway corridor that would facilitate access to Diss High School [in conjunction with site GNLP 0599]. It is anticipated that the landowner of site GNLP 0599 would consider working together with the Thelveton Estate to deliver a development. The proposed highway corridor would link Walcot Green (road) to Walcot Road and this would enable easy access to and from Diss High School and Diss railway station - WITHOUT creating an adverse effect on the Hamlet of Walcot Green. It would also offer an opportunity to link into the northern end of the Persimmon Homes development [Ref: 2016/1566] to the South (the right of connection has been reserved) thereby facilitating improved access by sustainable means to the train station, public transport and the town centre.</p> <p>Plot GNLP1044 is in fact two plots with a road through the middle. They should be designated as two separate plots. The eastern part considered for housing together with plot GNLP1003 providing Walcot Green was upgraded to a more suitable twin track road. Currently because of congestion on Victoria Road, Walcot Green is used as a preferred route into town by many residents.</p> <p><b>Norfolk Wildlife Trust comments</b>  We support the recognition that constraints regarding to biodiversity need to be addressed. Contributions to Green Infrastructure enhancement should be considered. 1004 [sic], 1044 &amp; 1045 may cause recreational impact on CWS 2286 (Frenze Brook) and mitigation will be required.  [The representor's reference to site GNLP1004 is assumed to refer to 1003, the former being in Geldeston and not Diss].</p> <p><b>Diss Town Council comments</b>  Inclusion of this and any adjoining sites is considered premature and prejudicial to the Diss &amp; District Neighbourhood Plan which would seek to allocate sites across the NP Area. We comment on this site without prejudice to the above and our comment on this specific site is that without major improvements to infrastructure and the local road network, development of this land for residential could not be supported. Current adjacent development at Frenze Hall Lane has exacerbated issues with the local road network and resulted in the formation of a local residents group to campaign for better infrastructure.</p>
GNLP1045	<p><b>General comments</b>  Comments submitted in support of site. Landowner has received little/no interest from purchasers/developers for employment use over 20+ years. Unsurprising given available land/buildings at Diss Business Park &amp; numerous vacant commercial premises in Diss indicating sufficient employment space. Unlikely any material interest in site for employment forthcoming anytime soon. Further nuisance to residents from the activity of Travellers likely if undeveloped.</p>

	<p>Site not suitable for substantial employment space as small parcel next to housing. Development for housing in sustainable location would contribute to Housing Land Supply and would be of strong interest to housebuilders.</p> <p>Plot GNLP1045 is the last green space in an area surrounded by housing and should be retained as a green area</p> <p><b>Norfolk Wildlife Trust comments</b> We support the recognition that constraints regarding to biodiversity need to be addressed. Contributions to Green Infrastructure enhancement should be considered. 1004 [sic], 1044 &amp; 1045 may cause recreational impact on CWS 2286 (Frenze Brook) and mitigation will be required.</p> <p><b>Diss Town Council comments</b> Inclusion of this and any adjoining sites is considered premature and prejudicial to the Diss &amp; District Neighbourhood Plan which would seek to allocate sites across the NP Area. We comment on this site without prejudice to the above and our comment on this specific site is that limited residential development would be supported given its proximity to Diss Railway station.</p>
<b>Heywood</b>	
GNLP0606	<p><b>General comments</b> Objections raised regarding scale of development, traffic, road safety issues, access and infrastructure. Issues raised around conserving the green space and wildlife. Concern that the form and character of the village would be changed by development.</p> <p>Comment states there are no concerns about this small development.</p> <p><b>Diss Town Council comments</b> Inclusion of this and any adjoining sites is considered premature and prejudicial to the Diss &amp; District Neighbourhood Plan which would seek to allocate sites across the NP Area. We comment on this site without prejudice to the above and our comment on this specific site is that development in these locations would be supported providing they are integrated with development in 0119, 0291, 0342 &amp; 0250 - see note reference link road for Louie's Lane / Shelfanger / Heywood Road.</p>
<b>Roydon</b>	
GNLP0119	<p><b>General comments</b> Comments raised in support of site. Site is the most suitable as it borders a road which could be upgraded to become a Northern Relief Road. However a portion would need to expand the Cemetery. It is believed the site has good access and would complement the 0342 Diss site.</p>

	<p>Objections raised concerning the site is adjacent to B1077 while being narrow with bends at this point, providing poor access. Denmark Street and the congested streets of Diss cannot cope with this development safely. Doctors and School are already at too high capacity. The site should be left as greenfield.</p> <p><b>Roydon Parish Council comments</b> As far as the council can see, development of this site would have no obviously adverse effect on existing residents or amenities. The existing track to the east of this site could possibly be adapted to provide access away from Shelfanger Road.</p> <p>The positive comments made on sites GNLP 0119, 0291 and 0362 by Roydon Parish Council, and any adjacent sites not in Roydon parish, is considered prejudicial and premature to the Diss &amp; District Neighbourhood which would seek to allocate sites across the whole NP area. Comments the Parish Council have made, therefore, are without prejudice to the outcome of the NP.</p>
GNLP0291	<p><b>General comments</b> Comments received in support of site. It is believed this site has acceptable access while being adjacent to the main northern radial route into the town centre were public transport services are available. They border the road which could be upgraded to become a Northern Relief Road. However, a proportion of the land is needed to expand the cemetery which has not been taken into account.</p> <p>Objections raised concerns regarding site close to main road causing traffic congestion. The local infrastructure would not be able to cope with spaces at Doctors, Dentists and Schools. Frontage of housing to the west of Shelfanger Road deliberately avoids direct B1077 access for good reason. It would need a separate side road and a mini-roundabout.</p> <p><b>Roydon Parish Council comments</b> As far as the council can see, development of this site would have no obviously adverse effect on existing residents or amenities. The existing track to the east of this site could possibly be adapted to provide access away from Shelfanger Road.</p> <p>The positive comments made on sites GNLP 0119, 0291 and 0362 by Roydon Parish Council, and any adjacent sites not in Roydon parish, is considered prejudicial and premature to the Diss &amp; District Neighbourhood which would seek to allocate sites across the whole NP area. Comments the Parish Council have made, therefore, are without prejudice to the outcome of the NP.</p>
GNLP0362	<p><b>General comments</b></p>

	<p>Objections raised regarding concerns the development of open countryside adjacent to Quaker Wood would have serious and detrimental impacts on conservation, educational and recreational value. Other concerns include whether infrastructure and amenities will be able to cope. The area lacks public transport and would have visual impacts significantly from the west. Other reservations include traffic congestion and the number of dwellings proposed.</p> <p>Comments submitted in support of site as the site borders a road that could be upgraded to become a Northern Relief Road. However a proportion of this land would need to be used to expand the cemetery which has not been taken into account.</p> <p>Comment submitted in support of the site by the way of a full representation and supporting technical evidence suggesting the site is suitable, available, achievable and viable and therefore deliverable.</p> <p><b>Roydon Parish Council comments</b> The council would support a proposal to develop part of this site (up to 40 dwellings) and low density housing but cannot support the proposed large scale development. The positive comments made on sites GNLP0119, 0291 and 0362 by Roydon Parish Council and any adjacent sites not in Roydon parish is considered prejudicial and premature to the Diss &amp; District Neighbourhood which would seek to allocate sites across the whole NP area. Comments the Parish Council have made, therefore, are without prejudice to the outcome of the NP.</p>
GNLP1038	<p><b>General comments</b> Comments submitted in support of site regarding further information in relation to the HELAA assessment, including distance to Wildlife site, overhead power cables, potential footway improvements, electricity and flooding.</p> <p>Once comment raised no specific concerns but advised it has been suggested the site would be suitable for self-build homes.</p> <p>Objections raised concerns regarding Brewers Green Lane being too narrow, taking away available green space, poor road visibility, impacts on wildlife, infrastructure, traffic congestion, over flowing services such as doctors &amp; dentists and the site was sold with the clause it would not be used for housing development. Other factors include the football club due to noise and lighting.</p> <p><b>Diss Town Council comments</b> Inclusion of this and any adjoining sites is considered premature and prejudicial to the Diss &amp; District Neighbourhood Plan which would seek to allocate sites across the NP Area. We comment on this site without prejudice to the above and our comment on this specific site</p>

	<p>is that we would support the view of Roydon Parish Council and Roydon residents.</p> <p><b>Roydon Parish Council comments</b>  The Diss and District Local Plan recognises the value to residents of Diss and Roydon of maintaining green space between the two communities. It is particularly important to preserve green areas around the historic Brewers Green, which is a signature landmark in this area. The council also see potential problems with access and with increased traffic flow on what are essentially rural lanes in this area. This site adjoins Diss Football Club ground which may not be ideal for a housing development.</p>
GNLP2104	<p><b>General comments</b>  Objections raised concerns regarding scale of development proposed, lack of infrastructure, unsuitable road network, overused services, road safety, traffic congestion, speed limits, poor access, dangerous junctions, impacts on the environment &amp; wildlife, loss of quietness and the site is in the parish of Roydon not Diss.</p> <p><b>Norfolk Wildlife Trust comments</b>  We note the proximity of this site to Brewers Green County Wildlife Site and are concerned at the potential ecological impacts of housing in this location. Should this site be progressed to the next consultation stage, then we would expect it to be accompanied by further details demonstrating how it would be deliverable without resulting in damage to adjoining areas of ecological value, for example through providing sufficient stand-off between development and priority habitats, and where proportional the provision of green infrastructure to ensure that the site has a net benefit for biodiversity.</p> <p><b>Diss Town council comments</b>  Mainly located in Roydon but with a substantial part of the plot in Heywood. 50.51 hectares for housing, which would have capacity for in excess of 1500 dwellings. This is unacceptable as it would need significant infrastructure changes in Diss and is outside the requirements of the Joint Core Strategy that Diss and District Neighbourhood Plan is working with.</p> <p><b>Roydon Parish Council comments</b>  GNLP2104 is a very large site relative to the size of the settlements of both Roydon and Diss. An approximate estimate for the number of houses on this site is 1250 which is considerably more than the whole of the number of dwellings currently in the parish of Roydon, considered a service village. Notwithstanding this, the number proposed is also considered to be of too great a density for a village parish.</p> <p>Issues raised include infrastructure (transport, healthcare, education), and road access.</p>

A decision on this site is considered prejudicial to the Diss & District Neighbourhood Plan of which Roydon is a part.

**South Norfolk Council comments**

Current day fluvial flood zones 2 & 3 inside the northern boundary of the site. Surface water flood flow path running west to east through the central part of the site.

**Diss Community Woodland Project comments**

Quaker Wood, Factory Lane, Roydon adjoins the eastern boundary of GNLP2104 and has been successfully run by our organisation as a fully accessible wildlife and community site since 2008. Any development of adjacent open countryside would have a serious and detrimental impact on its conservation, educational and recreational value.

We request the earliest opportunity to be consulted on the incorporation of wildlife allocation to ensure permanent and adequate links between Quaker Wood and the larger rural environment

## **STAGE 4 – DISCUSSION OF SUBMITTED SITES**

In this section sites are assessed in order to establish whether they are suitable for allocation. For the purposes of Sustainability Appraisal, suitable sites are those which are considered to be Reasonable Alternatives. Sites not considered suitable for allocation are not realistic options and therefore are not considered to be reasonable alternatives. The discussion below outlines the reasons why a site has been deemed suitable or unsuitable for allocation. By association this is also the outline of the reasons why a site was deemed to be a reasonable or unreasonable alternative.

A range of factors have been taken into account to establish whether a site should, or should not, be considered suitable for allocation. These factors include: impact on heritage and landscape; impact on the form and character of the settlement; relationship to services and facilities; environmental concerns, including flood risk; and, in particular, a safe walking route to a primary school. Sites which do not have a safe walking route to school, or where a safe walking route cannot be created will not be considered suitable for allocation.

Conclusions in regard to a sites performance against the relevant factors have also been informed by the outcomes of the HELAA, as set out under stage 2, consultation responses received, as summarised in stage 3, and other relevant evidence.

### **Diss**

At the time of writing, the Diss & District Neighbourhood Plan is at an early stage, prior to policy writing. From initial consultation, the Neighbourhood Plan's likely concerns include retaining the identity of each parish and reducing traffic congestion on Diss Town Centre. Of note are the Town Council's comments which imply that allocating sites may be premature to the development of a Neighbourhood Plan.

### **Sites considered to be reasonable alternatives:**

#### **GNLP0102**

This site off Sandy Lane, east of the railway line, is currently in use as Frontier Agriculture. Consideration would need to be given to the loss of employment land and if the site were likely to be attractive to another business use. If redeveloped for housing there would be potential for contamination given the current use of the site and there may also be amenity issues given that the surrounding land use is predominantly industrial and commercial. Most of the western boundary and a small part of the rest of the site is at risk of surface water flood risk. The shortest route to the Infant and Junior Schools would be north along Walcot Green and then Frenze Hall Road but there are no footways along Walcott Green up to the railway bridge. Alternative options could be to travel via Nelson Road and over the railway bridge or



via Mission Road or Sawmills Road and then Victoria Road (A1066). This latter route has continuous footpaths to the school but at 2km to the Infant School and 2.1km to the Junior School would be at upper limit of an acceptable walking distance to school. The site is considered to be a reasonable alternative for housing if the current operation by Frontier Agriculture were to cease, subject to further consideration about compatibility with neighbouring industrial uses.

#### GNLPO185

This site is already allocated as part of DIS1 in the adopted South Norfolk Local Plan. It is within the existing settlement boundary and as such is considered to be a reasonable alternative for reallocation in the emerging Greater Norwich Local Plan for housing. A very small area of the site is at risk of surface water flooding which is unlikely to affect the developable area. There may be potential amenity issues from proximity to the industrial estate to the south and the railway line to the east. The site has a safe route to schools in Diss via Prince William Way, with footpaths in place for the entire route.

#### GNLPO250

This site off Heywood Road is located to the north of the town. It is separated from the existing settlement boundary on the west side of Heywood Road by a chapel and cemetery although it is opposite housing on the east side of Heywood Road, which is within the settlement boundary. Development here could be seen to round off the existing settlement limit. Small areas of the site on the northern boundary and south east corner are at risk of surface water flooding but these are unlikely to affect the developable area. The cemetery land to the south is designated as a County Wildlife Site, with areas of established trees/vegetation, so the design of any housing would need to consider this. The Town Council would support this site coming forward in conjunction with sites GNLPO119, 0291 and 0342, with additional land allowed for expansion of the cemetery and a direct road link between Heywood Road, Shelfanger Road and Louie's Lane. There are safe pedestrian routes to schools in Diss so therefore the site is considered to be a reasonable alternative.

#### GNLPO341

This site between Shelfanger Road and Mount Street, is located within the existing settlement limit. It is promoted for 35 retirement units, 5 detached dwellings and land for future Health Centre expansion. The site is completely within the Conservation Area and near to a number of Listed Buildings with many established trees in and around the site. It is identified as an important open space in the adopted South Norfolk Local Plan as it is considered to contribute to the historic character of the town, which led to a red score on the HELAA assessment for Open Space and GI. The site promoter has addressed this by highlighting that their proposed scheme would have the benefit of opening up the currently inaccessible site for public access. There are some small areas of surface water flood risk within the site but these are unlikely to affect the overall developable area of the site. Norfolk Wildlife Trust object to allocation of the site as they consider that this area is likely to have local biodiversity value. They believe the site could be considered as Priority Habitat Wood pasture and parkland as referenced in the Natural Environment and Rural Communities Act and National Planning Policy Framework. Diss Town Council

object to residential development on the site but would support a possible extension to the health centre. This site is centrally located with good access to services and facilities and on balance this site is considered to be a reasonable alternative.

#### GNLP0342

This site, land east of Shelfanger Road, is located to the north of the town. It is adjacent to St Henry Morse Roman Catholic Church, cemetery and the existing settlement boundary. Development here could be seen to round off the existing settlement limit. The north west corner of the site is at risk of surface water flooding which is unlikely to adversely affect the overall developable area. The cemetery land to the south is designated as a County Wildlife Site, with areas of established trees/vegetation, so the design of any housing would need to consider this. The Town Council would support this site coming forward in conjunction with sites GNLP0119, 0250 and 0291, with additional land allowed for expansion of the cemetery and a direct road link between Heywood Road, Shelfanger Road and Louie's Lane. There are safe pedestrian routes to schools in Diss so therefore the site is considered to be a reasonable alternative.

#### GNLP0599

This site, land off Walcot Road, Walcot Green, is located to the north of the town adjacent to the existing settlement limit. A small area is at risk of surface water flooding and there seems to be a large established tree in the centre of the site. It appears that access could be taken from either Walcot Road or Walcot Rise and this would need further investigation. If pedestrian access was taken via Walcot Rise then there is a safe route to both the Infant and Junior school so the site is considered to be a reasonable alternative.

#### GNLP1044

Site GNLP1044, Land North of Frenze Hall Lane and West of Walcot Green, is located to the north of the town near to the hamlet of Walcot Green. This is a large site which is adjacent to the existing settlement boundary and near to the DIS4 allocation in the adopted South Norfolk Local Plan. There are small areas within the site, particularly to the eastern boundary which are at surface water flood risk but these are unlikely to significantly affect the developable area. There is currently no safe route to school along Walcot Green but it may be possible to provide footpaths to link with the existing footway on Frenze Hall Lane through development. Transport and Roads were flagged as constraint in the HELAA so access will need further consideration. Development here would extend Diss further into open countryside and there may be landscape impacts, but the site is considered to be a reasonable alternative subject to highways considerations. It maybe that only part of the site may be suitable for allocation.

#### GNLP1045

This site is within the existing settlement limit, located to the West of Nelson Road and East of Station Road. It forms part of DIS 8, currently allocated in the adopted South Norfolk Local Plan for employment use, but the promoter is now suggesting

the site for residential. Around half the site is at risk of surface water flooding which may affect the developable area. The remaining area would total approx. 0.36 hectares which in some locations may mean it is too small to consider for allocation but in this location a higher density development may be appropriate to reflect nearby development off Nelson Road. There are potential amenity concerns from the railway and nearby industrial use but development at Viscount Close sets a precedent for residential. The site is considered to be a reasonable alternative subject to the loss of part of the current employment allocation.

### **Sites not considered to be reasonable alternatives:**

#### GNLP1003

This site at The Grange, is located to the north of Diss in the hamlet of Walcot Green. This site is not considered to be a reasonable alternative as there is no safe route to school via Walcot Green and no likelihood of being able to provide one. Footpath provision may be a possibility if adjacent site GNLP1044 were also allocated but this is not a certainty. It is considered that development in this location would not be well related to the services and facilities in the main part of Diss, it would extend the built up area of Diss further into open countryside and there are more suitable sites to consider for allocation.

#### Heywood

### **Sites not considered to be reasonable alternatives:**

#### GNLP0606

This site at Boundary Farm, Shelfanger Road is located to the north of Diss mostly in the parish of Heywood. It is separated from the existing Diss settlement limit by site GNLP0362 and development here would extend the built up area of Diss further into open countryside. Nearly half the site is at risk of surface water flood risk, which would have an effect on the developable area. Around half the site is brownfield land so there is potential for contamination issues given the current use (recycling). There also appears to be some established trees and hedges on the site. The site is more than 2km from the Infant school with no safe pedestrian route, and this coupled with other constraints such as flood risk mean it is not considered to be a reasonable alternative.

#### Roydon

### **Sites considered to be reasonable alternatives:**

#### GNLP0119

This site at 156 Shelfanger Road is well related to the existing settlement limit for Diss to the south of the Recreation Ground. The submission proposes demolition of an existing large house. Small areas of the southern boundary are at risk of surface water flooding which would be unlikely to affect the developable area. Consultation comments raise concerns over access so this would need to be further investigated. There are safe pedestrian routes to schools in both Roydon and Diss so therefore the site is considered to be a reasonable alternative.

### GNLP0291

This site, land north of Shelfanger Road, is adjacent to site GNLP0119 and the existing settlement limit for Diss. Small areas of the northern boundary are at risk of surface water flooding which would be unlikely to affect the developable area. There appears to be much established vegetation on site. Vehicular access would need further consideration but as there are safe pedestrian routes to schools in both Roydon and Diss the site is considered to be a reasonable alternative.

### GNLP0362

This large site, land at Sturgeons Farm, off Farm Close, Louie's Lane, Shelfanger Road, is promoted for mixed use development. It is adjacent to the existing settlement limit for Diss. Large areas of the site are at risk of surface water flooding which would be likely to affect the developable area. Roydon Parish Council would support development on part of the site for approximately 40 homes but do not favour development on the whole of the site proposed. There are safe pedestrian routes to schools in both Roydon and Diss so therefore the site is considered to be a reasonable alternative.

### GNLP2104

This is a very large site proposal west of Shelfanger Road which is in both Roydon and Heywood parishes. It is likely that the site as promoted will be too large but smaller sections may be suitable to consider for allocation. The central part of the site and much of the northern boundary is at risk of surface water flooding which would affect the developable area. The northern boundary is also in flood zones 2 and 3. The majority of the site is located some distance from the existing settlement boundary for Diss, with the closest section being at the southern boundary. A small part of the site is next to a County Wildlife Site and also Quaker Wood and there are some pockets of established trees within the site. A number of objections were received to the site through the public consultation. If pedestrian access were taken from the northern end of the site onto Shelfanger Road it would be more than 2km to schools in Roydon and Diss. If pedestrian access were taken from the southern end of the site onto Factory Lane, a pedestrian route could be provided to schools in both Roydon and Diss subject to a small section of footpath to link up with the existing footway on Factory Lane. Vehicular access will need to be investigated. The site is listed as a reasonable alternative, subject to being able to achieve satisfactory vehicular and pedestrian access and on the understanding that it is likely that only the southern section of the site is likely to be suitable for allocation.

### **Sites not considered to be reasonable alternatives:**

#### GNLP1038

This site is located to the north of Brewer Green Lane, separated from the existing Diss settlement limit by the Diss Town Football Club site. There are also some listed buildings nearby to the west of the site. Both Brewers Green and Factory Lane are narrow, so highways access may not be supported and there is no safe route to either schools in Roydon or Diss. The site is therefore not considered to be a reasonable alternative.

**STAGE 5 – SHORTLIST OF REASONABLE ALTERNATIVE SITES FOR FURTHER ASSESSMENT**

Based on the assessment undertaken at stage 4 above the following sites are considered to be reasonable alternatives.

<b>Address</b>	<b>Site Reference</b>	<b>Area (ha)</b>	<b>Proposal</b>
<b>Diss</b>			
Frontier Agriculture Ltd, Sandy Lane	GNLP0102	3.61	Residential (Unspecified Number)
Land to the South of Prince William Way	GNLP0185	1.01	Residential (Unspecified Number)
Land at Heywood Road	GNLP0250	3.00	Residential (Unspecified Number)
Land between Shelfanger Road and Mount Street	GNLP0341	3.21	35 retirement living units, 5 detached dwellings, and land set aside for future Health Centre expansion.
Land East of Shelfanger Road	GNLP0342	4.76	Approx. 100 dwellings and open space.
Land off Walcot Road, Walcot Green	GNLP0599	3.29	Residential (Unspecified Number)
Land North of Frenze Hall Lane and West of Walcot Green	GNLP1044	10.95	Residential (Unspecified Number)
Land West of Nelson Road and East of Station Road	GNLP1045	0.94	Residential (Unspecified Number)
<b>Roydon</b>			
156 Shelfanger Road	GNLP0119	0.68	Residential development (Unspecified number)
Land north of Shelfanger Road	GNLP0291	0.93	Residential development of up to 33 dwellings
Land at Sturgeons Farm, off Farm Close, Louie's Lane, Shelfanger Road	GNLP0362	13.81	Residential use mixed-led development of approx. 413 dwellings

West of Shelfanger Road (Part in Roydon, part in Heywood)	GNLP2104	49.00	Residential (Unspecified Number)
<b>Total</b>		<b>95.19</b>	

**STAGE 6 – DETAILED SITE ASSESSMENTS OF REASONABLE ALTERNATIVE SITES**

<b>Site Reference:</b>	GNLP0102
<b>Address:</b>	Frontier Agriculture Ltd, Sandy Lane
<b>Proposal:</b>	Residential (Unspecified Number)

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Employment (Grain Processing and Storage)	Brownfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<p><b>Amber Constraints in HELAA</b>          Access, Utilities Capacity, Contamination and Ground Stability, Flood Risk, Biodiversity &amp; Geodiversity and Compatibility with Neighbouring Uses.</p>
<p><b>HELAA Conclusion</b>          This site is in use as a grain processing and storage facility (and has been for decades), and so is a brownfield site. There is therefore the potential for some land contamination. Any potential access constraints and localised highways impacts could probably be overcome through re-development, although improvements to the Sawmills Road/Victoria Road junction may be necessary and general peak-time traffic congestion along the A1066 is acknowledged. The site is well-located to local services, being adjacent to the railway station (which is Grade II-listed) and close to employment opportunities and within easy reach of schools and the town centre. Whilst the site is proximal to the railway line and other employment uses, any noise impacts are thought likely to be able to be mitigated. Some sewerage upgrades are likely to be necessary. Some mitigation measures may be necessary due to the proximity of Frenze County Wildlife Site. There are some likely constraints affecting this site, including potential contamination and highways impacts, but they should be able to be overcome. The site is concluded as suitable for the land availability assessment.</p>

<b>FURTHER COMMENTS</b>
<p><b>Highways</b>          No comment</p> <p><b>Development Management</b>          The GNLP discussion on this site picks up all of the issues. The principle is ok, but loss of employment of concern. We would question whether the site needs allocating or whether should be left for an application to demonstrate loss of the</p>

employment. A key consideration is the highway impact particularly at the Sawmills Road/Victoria Road junction and along the A1066.

If developed, the nature of the site lends itself to a relatively 'self-contained' and architecturally distinctive development, with the potential for a higher density and more urban style of development, appropriate for a site next to the town's railway station.

**Constraints:**

- The railway line prevents connections and development immediately to the west and will result in an element of noise.
- Employment sites (separated by the road) exist to east and south.
- Frenze Lane bridge/underpass prevents easy vehicle movement further north to the west and direction of vehicle movement will be predominantly to the south along Sawmills Road to connect to the A1066.
- The site significantly narrows at the north end which will create difficulty for development at this end.
- Highways have previously indicated a requirement to contribute to traffic signals at the railway bridge so that one lane can be used for cycling/footpath.
- Frenze Hall (grade II) and St Andrew church (grade I) are approx. 500m to the NE of the site, but there are existing commercial/industrial units to the east of the site. Unlikely to be significant setting issue but depends on height.
- Site may require significant de-contamination from existing industrial use.

**Minerals & Waste**

No comments

**Lead Local Flood Authority**

No comments

**Children's Services**

Diss has considerable pressure for pupil places and would not be able to cope with further growth without new school provision.

**PLANNING HISTORY:**

Not known

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION**

No additional documents submitted to support this proposal.



<b>Site Reference:</b>	GNLP0185
<b>Address:</b>	Land to the South of Prince William Way
<b>Proposal:</b>	Residential (Unspecified Number)

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Unused/vacant	Greenfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<p><b>Amber Constraints in HELAA</b> Utilities Capacity, Flood Risk and Compatibility with Neighbouring Uses.</p>
<p><b>HELAA Conclusion</b> The site comprises vacant land immediately south of an existing housing area and is bordered by an industrial estate to the southwest and the main Norwich-London rail line immediately to the east. It falls partly within local plan allocation DIS 1. Diss benefits from the full range of core services and facilities and the site is highly accessible. There are no known constraints from utilities infrastructure on site but the proximity of the rail line may impose a noise constraint. The site has no known constraints from contamination/ground stability and only minimal risk of surface water flooding to a small part. Off-site mains reinforcement and sewerage infrastructure upgrades would be required to serve growth in this location. There are no nationally protected landscapes in the immediate vicinity of the site but the locally designated River Waveney Valley protection zone is in close proximity. The site is also within a 3km protection zone around Sites of a Special Scientific Interest and a County Wildlife Site is 300m away which may result in a need for some mitigation. There would be no significant impacts on heritage assets or on townscape. Initial highways evidence has indicated that access constraints could be overcome through development and that any impact on the local road network could be mitigated. The site is considered suitable for the land availability assessment. The site is however subject to an existing allocation for housing, and it will not contribute any additional development capacity for the purposes of the HELAA analysis.</p>

<b>FURTHER COMMENTS</b>
<p><b>Highways</b> No comment</p> <p><b>Development Management</b> Already allocated by DIS1</p> <p><b>Minerals &amp; Waste</b> No comments</p> <p><b>Lead Local Flood Authority</b></p>

No comments

**Children's Services**

Diss has considerable pressure for pupil places and would not be able to cope with further growth without new school provision.

**PLANNING HISTORY:**

Already allocated by DIS1

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION**

- Environment Agency Statement

<b>Site Reference:</b>	GNLP0250
<b>Address:</b>	Land at Heywood Road
<b>Proposal:</b>	Residential (Unspecified Number)

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Agricultural	Greenfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<p><b>Amber Constraints in HELAA</b> Access, Utilities Capacity, Significant Landscapes, Biodiversity &amp; Geodiversity and Transport &amp; Roads.</p>
<p><b>HELAA Conclusion</b> This greenfield site is located immediately north of the Diss Cemetery (which is a County Wildlife Site and non-designated heritage asset); mitigation measures (perhaps including a buffer zone) would probably be needed. As a location within the Waveney Valley landscape area, development would need to be designed sensitively. Access to the site would probably be from Heywood Road, to the east. Some mitigation measures may be needed to ensure an appropriate highways access, and enhanced footpath provision is probably achievable. However, especially if developed alongside other nearby sites, additional traffic pressure could be put on Shelfanger Road and the surrounding area; some wider traffic mitigation measures may be necessary. No designated heritage assets would be affected by the development of the site. Enhancements to the sewerage and water supply network would be needed. The site is relatively close to the town centre, and has good access to shops, public transport, employment opportunities and schools. The site is concluded as being suitable for the land availability assessment.</p>

<b>FURTHER COMMENTS</b>
<p><b>Highways</b> No comment</p> <p><b>Development Management</b> GNLP 0250; GNLP0342 GNLP 0119 and GNLP 0291 in our opinion would be a combined preferred site if this would facilitate a link road to connect Heywood Road and Shelfanger Road, although NCC Highways would need to advise.</p> <p><b>Minerals &amp; Waste</b> No comments</p> <p><b>Lead Local Flood Authority</b> No comments</p>

**Children's Services**

Diss has considerable pressure for pupil places and would not be able to cope with further growth without new school provision.

**PLANNING HISTORY:**

Not known

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION**

No additional documents submitted to support this proposal.

<b>Site Reference:</b>	GNLP0341
<b>Address:</b>	Land between Shelfanger Road and Mount Street
<b>Proposal:</b>	35 retirement living units, 5 detached dwellings, and land set aside for future Health Centre expansion.

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Grazing land	Greenfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<p><b>Amber Constraints in HELAA</b> Access, Utilities Capacity, Flood Risk, Townscapes, Biodiversity &amp; Geodiversity and Historic Environment.</p> <p><b>Red Constraints in HELAA</b> Open Space and Green Infrastructure.</p>
<p><b>HELAA Conclusion</b> This greenfield site is currently identified as an Important Local Open Space in the South Norfolk Local Plan, and its development for retirement-led residential use would clearly adversely affect the openness of the area. In addition, the site is a very important historic open space within the Conservation Area, with strong historic links to 60 Mount Street (the only detached landscape park in Norfolk) and other listed buildings; development of the site would clearly be damaging in this context too. Whilst the precise access point(s) are unclear, it is thought likely that the highways and footpath impacts could be mitigated satisfactorily. Given the proximity to existing development, sewerage upgrades are likely to be achievable, and the small area of surface water flooding (1 in 100-years) could either be avoided or mitigated. As a site with mature trees, were any to potentially be lost, it might affect the local bat population – further work would need to be done. Clearly, given its location adjacent to the town centre, the site is well-located to shops, with employment opportunities, public transport, a GP surgery and schools close by too. The significance of the Open Space is a major constraint and the site is concluded as being unsuitable for the land availability assessment.</p>

<b>FURTHER COMMENTS</b>
<p><b>Highway</b> No comment</p> <p><b>Development Management</b> Not preferred – important local open space to be maintained.</p> <p><b>Minerals &amp; Waste</b> No comments</p> <p><b>Lead Local Flood Authority</b></p>

No comments

**Children's Services**

Diss has considerable pressure for pupil places and would not be able to cope with further growth without new school provision.

**PLANNING HISTORY:**

Not known

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION**

- Sketch Masterplan
- Detailed Projections
- Highways and Transportation Summary Note
- Utilities Overview Note
- Flooding Overview Notes
- Landscape Summary Note
- Landscape Design Scheme
- Preliminary Ecological Appraisal Update
- Demographic Report
- Vision Document
- Proposed Masterplan

<b>Site Reference:</b>	GNLP0342
<b>Address:</b>	Land East of Shelfanger Road
<b>Proposal:</b>	Approx. 100 dwellings and open space.

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Agriculture	Greenfield

### **CONSTRAINTS IDENTIFIED IN THE HELAA**

#### **Amber Constraints in HELAA**

Access, Utilities Capacity, Significant Landscapes, Biodiversity & Geodiversity and Transport & Roads.

#### **HELAA Conclusion**

Direct access to the site would be very difficult, as it might require the use of a single track road going past the Catholic church to access Shelfanger Road (which, unless widened, would be very unlikely to be acceptable). However, if the site could be developed in conjunction with neighbouring promoted sites then much better access could potentially be secured; with sites 0119 and 0291 to the west, better access to Shelfanger Road might be secured; and/or with site 0250 to the east, better access to Heywood Road could be secured. Especially if developed alongside other nearby sites, additional traffic pressure could be put on Shelfanger Road and the surrounding area; some wider traffic mitigation measures may be necessary. This greenfield site is located immediately north of the Diss Cemetery (which is a County Wildlife Site and non-designated heritage asset); mitigation measures (perhaps including a buffer zone) would probably be needed. As a location within the Waveney Valley landscape area, development would need to be designed sensitively. No designated heritage assets would be affected by the development of the site. Enhancements to the sewerage and water supply network would be needed and there is a small area of surface water flooding (1:100 years) that would need to be avoided or mitigated. The site is relatively close to the town centre, and has good access to shops, public transport, employment opportunities and schools. Subject to an appropriate highways access being deliverable through third-party land, the site is concluded as being suitable for the land availability assessment.

### **FURTHER COMMENTS**

#### **Highways**

No comment

#### **Development Management**

GNLP 0250; GNLP 0342 GNLP 0119 and GNLP 0291 in our opinion would be a combined preferred site if this would facilitate a link road to connect Heywood Road and Shelfanger Road, although NCC Highways would need to advise.

**Minerals & Waste**

No comments

**Lead Local Flood Authority**

No comments

**Children's Services**

Diss has considerable pressure for pupil places and would not be able to cope with further growth without new school provision.

**PLANNING HISTORY:**

Not known

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION**

No additional documents submitted to support this proposal.



<b>Site Reference:</b>	GNLP0599
<b>Address:</b>	Land off Walcot Road, Walcot Green
<b>Proposal:</b>	Residential (Unspecified Number)

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Agricultural	Greenfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<p><b>Amber Constraints in HELAA</b> Utilities Capacity, Significant Landscapes, Townscapes, Historic Environment and Transport &amp; Roads.</p>
<p><b>HELAA Conclusion</b> This greenfield site lies between Diss and Walcot Green. The sewerage system would need upgrading, but this would be likely to be achievable. The site lies within one mile of a range of services, including employment opportunities, schools, shops and the railway station. The site could impact on some listed buildings in Walcot Green but is thought likely to be mitigatable. Particularly in combination with site 0599, pressure would be put on the local road network, but if access would be via a continuation of Walcot Rise (to the south), this would likely be acceptable in highways terms. If access to narrow Walcot Road was considered, some mitigation to the bend (which has poor visibility) would likely be required. There are no significant areas of flood risk on the site, just some minor surface water flooding risks along the eastern boundary with the railway line. The site is concluded as being suitable for the land availability assessment.</p>

<b>FURTHER COMMENTS</b>
<p><b>Highways</b> No comment</p> <p><b>Development Management</b> Issues of river valley, erosion of rural character, poor highway and connectivity. Not preferred.</p> <p><b>Minerals &amp; Waste</b> No comments</p> <p><b>Lead Local Flood Authority</b> No comments</p> <p><b>Children's Services</b> Diss has considerable pressure for pupil places and would not be able to cope with further growth without new school provision.</p>

<b>PLANNING HISTORY:</b>
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Not known
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<b>BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION</b>
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No additional documents submitted to support this proposal.
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<b>Site Reference:</b>	GNLP1044
<b>Address:</b>	Land North of Frenze Hall Lane and West of Walcot Green
<b>Proposal:</b>	Residential (Unspecified Number)

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Agricultural	Greenfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<p><b>Amber Constraints in HELAA</b> Access, Utilities Capacity, Utilities Infrastructure, Flood Risk, Significant Landscapes, Townscapes, Biodiversity &amp; Geodiversity, Historic Environment and Compatibility with Neighbouring Uses.</p> <p><b>Red Constraints in HELAA</b> Transport &amp; Roads.</p>
<p><b>HELAA Conclusion</b> This greenfield site lies between Diss and Walcot Green. Part of the site is adjacent to the railway line; some noise mitigation may be necessary. The sewerage system would need upgrading, but this would be likely to be achievable. The site lies within one mile of a range of services, including employment opportunities, schools, shops and the railway station. The site could impact on some listed buildings in Walcot Green, and a Grade I-listed church in nearby Frenze. Some mitigation of potential ecological impacts on Frenze Hall County Wildlife Site may be necessary. Particularly in combination with site 0599, pressure would be put on the local road network (Frenze Hall Lane and Walcot Green) and on the basis of current evidence, it appears unlikely that satisfactory highways and footpath improvements are capable of being delivered, due to the constraints (narrow roads). Small parts of the site alongside the railway line, that are vulnerable to surface water flooding, at 1 in 30 and 1 in 100 risk. Due to the significant highways constraints, the site is concluded as being unsuitable for the land availability assessment.</p>

<b>FURTHER COMMENTS</b>
<p><b>Highways</b> No comment</p> <p><b>Development Management</b> Poor road network and capacity issues. Not preferred.</p> <p><b>Minerals &amp; Waste</b> No comments</p> <p><b>Lead Local Flood Authority</b></p>

No comments

**Children's Services**

Diss has considerable pressure for pupil places and would not be able to cope with further growth without new school provision.

**PLANNING HISTORY:**

Not known

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION**

- Access Plan
- Concept Plan
- Highways and Drainage Technical Note
- Junction Plan

<b>Site Reference:</b>	GNLP1045
<b>Address:</b>	Land West of Nelson Road and East of Station Road
<b>Proposal:</b>	Residential (Unspecified Number)

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Unused/vacant	Brownfield

### **CONSTRAINTS IDENTIFIED IN THE HELAA**

#### **Amber Constraints in HELAA**

Utilities Capacity, Contamination and Ground Stability, Flood Risk, Market Attractiveness and Compatibility with Neighbouring Uses.

#### **HELAA Conclusion**

This brownfield site (former industrial and railway land) is proposed for residential development. It lies just east of the railway line and is surrounded by existing industrial development to the north and south, with residential development to the east. Given past uses, there may be some contaminated land on the site, and careful mitigation measures would likely be necessary to manage noise from the railway line and adjoining industrial uses. Some 1-in-100 year surface water flooding risks on the southern part of the site would need to be mitigated, and the sewerage and surface water networks would need to be upgraded (which seems possible). Access to the highways network would be unlikely to cause any difficulties. The site lies close to a range of services, including employment opportunities, schools, shops and the railway station. There would be no impact on any designated heritage assets, although some mitigation of recreational impacts on Frenze Brook County Wildlife Site may be necessary. The site is subject to an existing allocation for employment uses, a form of development different from that which is being proposed. Should this proposal be taken forward it would be subject to acceptance of the loss of the existing committed use. Therefore, the site is not considered to offer additional capacity for the land availability assessment.

### **FURTHER COMMENTS**

#### **Highway**

No comment

#### **Development Management**

Loss of employment to be considered if allocated to residential use, would not rule this out.

#### **Minerals & Waste**

No comments

#### **Lead Local Flood Authority**

No comments

**Children's Services**

Diss has considerable pressure for pupil places and would not be able to cope with further growth without new school provision.

**PLANNING HISTORY:**

Not known

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION**

No additional documents submitted to support this proposal.

<b>Site Reference:</b>	GNLP0119
<b>Address:</b>	156 Shelfanger Road
<b>Proposal:</b>	Residential development (Unspecified number)

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Residential Garden	Greenfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<p><b>Amber Constraints in HELAA</b> Access, Flood Risk, Significant Landscapes, Biodiversity &amp; Geodiversity and Transport &amp; Roads.</p>
<p><b>HELAA Conclusion</b> This is a current residential garden, proposed for 15-20 dwellings. So long as the site was to be developed alongside site 0291 (immediately to the south), and an appropriate footway could be provided, there would not be any localised highways concerns. Especially if developed alongside other nearby sites, however (such as 0250 and 0349 to the east), additional traffic pressure could be put on Shelfanger Road and the surrounding area; some wider traffic mitigation measures may be necessary. This greenfield site is located close to Diss Cemetery (which is a County Wildlife Site and non-designated heritage asset); mitigation measures may be needed. As a location within the Waveney Valley landscape area, development would need to be designed sensitively. No designated heritage assets would be affected by the development of the site. Enhancements to the sewerage and water supply network would be needed. The site is relatively close to the town centre, and has good access to shops, public transport, employment opportunities and schools. Subject to being developed alongside adjacent site 0291, the site is concluded as being suitable for the land availability assessment.</p>

<b>FURTHER COMMENTS</b>
<p><b>Highways</b> No comment</p> <p><b>Development Management</b> GNLP 0250; GNLP 0342 GNLP 0119 and GNLP 0291 in our opinion would be a combined preferred site if this would facilitate a link road to connect Heywood Road and Shelfanger Road, although NCC Highways would need to advise.</p> <p><b>Minerals &amp; Waste</b> No comments</p> <p><b>Lead Local Flood Authority</b> No comments</p>

**Children's Services**

Diss has considerable pressure for pupil places and would not be able to cope with further growth without new school provision.

**PLANNING HISTORY:**

Not known

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION**

- Indicative site layout plan



<b>Site Reference:</b>	GNLP0291
<b>Address:</b>	Land north of Shelfanger Road
<b>Proposal:</b>	Residential development of up to 33 dwellings

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Part unused, part horticultural	Greenfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<p><b>Amber Constraints in HELAA</b> Access, Flood Risk, Significant Landscapes, Biodiversity &amp; Geodiversity and Transport &amp; Roads.</p>
<p><b>HELAA Conclusion</b> This greenfield site is located close to Diss Cemetery (which is a County Wildlife Site and non-designated heritage asset); mitigation measures may be needed. As a location within the Waveney Valley landscape area, development would need to be designed sensitively. There may be a need to protect some of the boundary trees and hedges, which are likely to be of some ecological value. So long as the site was to be developed alongside site 0119 (immediately to the north), and an appropriate footway could be provided, there would not be any localised highways concerns. Especially if developed alongside other nearby sites, however (such as 0250 and 0349 to the east), additional traffic pressure could be put on Shelfanger Road and the surrounding area; some wider traffic mitigation measures may be necessary. No designated heritage assets would be affected by the development of the site. Enhancements to the sewerage and water supply network would be needed. The site is relatively close to the town centre, and has good access to shops, public transport, employment opportunities and schools. Subject to being developed alongside adjacent site 0119, the site is concluded as being suitable for the land availability assessment.</p>

<b>FURTHER COMMENTS</b>
<p><b>Highways</b> No comment</p> <p><b>Development Management</b> GNLP 0250; GNLP 0342 GNLP 0119 and GNLP 0291 in our opinion would be a combined preferred site if this would facilitate a link road to connect Heywood Road and Shelfanger Road, although NCC Highways would need to advise.</p> <p><b>Minerals &amp; Waste</b> No comments</p> <p><b>Lead Local Flood Authority</b> No comments</p>

**Children's Services**

Diss has considerable pressure for pupil places and would not be able to cope with further growth without new school provision.

**PLANNING HISTORY:**

Not known

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION**

- Illustrative Masterplan

<b>Site Reference:</b>	GNLP0362
<b>Address:</b>	Land at Sturgeons Farm, off Farm Close, Louie's Lane, Shelfanger Road
<b>Proposal:</b>	Residential use mixed-led development of approx. 413 dwellings

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Agricultural	Greenfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<p><b>Amber Constraints in HELAA</b>  Access, Utilities Capacity, Flood Risk, Significant Landscapes, Biodiversity &amp; Geodiversity and Transport &amp; Roads.</p>
<p><b>HELAA Conclusion</b>  This is a large greenfield site proposed for about 400 dwellings. Enhancements to the sewerage and water supply network would be needed, perhaps including the closest Water Recycling Centre. Particularly in combination with nearby sites, additional traffic pressure would be put on Shelfanger Road and the surrounding area; some wider traffic mitigation measures may be necessary. Development of the scale of this site would also add to the traffic pressure along the A1066 through Diss. A suitable highways access to the site to Shelfanger Road is probably achievable. A small watercourse runs along the northern boundary of the site, and parts of the site close to this are affected by 1:100-years surface water flooding. There would not be any negative impacts on heritage assets or townscapes from the site's development, although given its current location within the Waveney Valley landscape policy, development would need to be designed appropriately. There are several nearby County Wildlife Sites which might require some mitigation. The watercourse and a small copse in the site would also need protection. Although the site is on the north-west edge of Diss, it still has reasonable access to shops, public transport, employment opportunities and schools. The site is concluded as being suitable for the land availability assessment.</p>

<b>FURTHER COMMENTS</b>
<p><b>Highways</b>  No comment</p> <p><b>Development Management</b>  Issues of landscape character and harm to rural edge – not preferred</p> <p><b>Minerals &amp; Waste</b>  No comments</p>

**Lead Local Flood Authority**

No comments

**Children's Services**

Diss has considerable pressure for pupil places and would not be able to cope with further growth without new school provision.

**PLANNING HISTORY:**

Not known

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION**

- Highway Report
- Indicative masterplan layout

<b>Site Reference:</b>	GNLP2104
<b>Address:</b>	West of Shelfanger Road (part in Roydon, part in Heywood)
<b>Proposal:</b>	Residential (Unspecified Number)

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Agriculture	Greenfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<b>Amber Constraints in HELAA</b> Access, Accessibility to Services, Flood Risk, Townscapes, Biodiversity and Geodiversity, Historic Environment, Transport and Roads
<b>HELAA Conclusion</b> This 50.51 ha site is located west of Shelfanger Road. Initial highway evidence suggest that the local road network is considered to be unsuitable either in terms of road or junction capacity and lack of footpath provision, therefore, mitigation would be required. The centre of the site is at risk of surface flooding, and the northern border of the site is within flood zone 3, which would require mitigation. Other environmental constraints include the adjacent Brewer's Green County Wildlife Site and the southern portion of the site being within the Waveney River valley. The site is also near to numerous Grade II listed buildings, which would need consideration. Although the site has constraints it is considered suitable for the land availability assessment.

<b>FURTHER COMMENTS</b>
<b>Highways</b> No comments
<b>Development Management</b> No comments
<b>Minerals &amp; Waste</b> No comments
<b>Lead Local Flood Authority</b> No comments
<b>Children's Services</b> Diss has considerable pressure for pupil places and would not be able to cope with further growth without new school provision.

<b>PLANNING HISTORY:</b>
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Not known
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<b>BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION</b>
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No additional documents submitted to support this proposal.
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## **STAGE 7 – SETTLEMENT BASED APPRAISAL OF REASONABLE ALTERNATIVE SITES AND IDENTIFICATION OF PREFERRED SITE/S (WHERE APPROPRIATE) FOR REGULATION 18C DRAFT PLAN CONSULTATION.**

Twelve reasonable alternative sites have been identified in Diss (including part in Roydon parish) at Stage 5 of this booklet. These sites were considered to be worthy of further investigation to look at their potential for allocation as the initial assessment did not flag up any major constraints that would preclude development. These sites have been subject to further discussion with Development Management, Highways, Flood Authority and Children's Services in order to identify preferred sites for allocation and their comments are recorded under Stage 6 above.

Diss is a Main Town and the 'Towards a Strategy' document identifies a requirement for 900 – 1000+ dwellings across this sector of the hierarchy. Through further discussion two locations were identified as the most suitable. Sites GNLP 0250, 0342, 0119, 0291 (combined) form one of these locations as they are well related in form and character terms to the existing built up area of Diss and would enable the provision of a link road to the north of Diss which may alleviate some existing traffic problems. GNLP 0102 is also preferred for allocation as it is a brownfield site close to the railway station.

Overall, highways issues limit the scale of growth in Diss. However, if additional growth is needed in the towns, GNLP 0341 could be acceptable for 35 retirement living units, 5 detached dwellings and land set aside for future Health Centre expansion. Although it is centrally located with good access to services and facilities, it is currently identified as an important open space in the South Norfolk Local Plan. This site is therefore a reasonable alternative. Another site, GNLP 1045 is within the existing settlement limit and is currently allocated for employment use under South Norfolk Local Plan policy DIS8. This is considered to be a reasonable alternative for residential use if it can be shown that the employment allocation is no longer required because of its proximity to Diss railway station.

Sites GNLP0185, GNLP0362, GNLP0599, GNLP0606, GNLP1003, GNLP1038, GNLP1044, GNLP2104 have been dismissed mainly due to highway constraints and landscape impacts, but for some sites the impact on the built form of the town or the distance to the local school ruled out allocation.

In conclusion there are two sites (one of which is made of 4 sites) identified as preferred options in Diss providing for 400 new homes. There are three carried forward allocations providing for 87 new homes and a total of 256 additional dwellings with planning permission. This gives a total deliverable housing commitment for Diss (including part of Roydon) of 743 homes between 2018 – 2038.

**Preferred Sites:**

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
<b>Diss (including part of Roydon)</b>				
Land west of Heywood Road and east of Shelfanger Road	GNLP0250, 0342, 0119, 0291 (combined)	8.91	200 dwellings plus road to link Heywood Road and Shelfanger Road	This combination of sites is preferred for allocation as they are well related in form and character terms to the existing built up area of Diss and would enable the provision of a link road to connect Heywood Road and Shelfanger Road, which may alleviate some existing traffic problems. The allocation would need to be supported by a Transport Assessment.
Frontier Agriculture Ltd, Sandy Lane	GNLP0102	3.61	200 dwellings	This site is preferred for allocation as it is a brownfield site sustainably located close to the railway station. Its location means that medium to high density development is likely to be achievable, although it would need to be relatively self-contained and architecturally distinctive. The timing of development will be dependent on the relocation of existing employment uses.

**Reasonable Alternative Sites:**

Address	Site Reference	Area (ha)	Proposal	Reason for not allocating
<b>Diss (including part of Roydon)</b>				
Land between Shelfanger Road and Mount Street	GNLP0341	3.21	35 retirement living units, 5 detached dwellings and land set aside	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



Address	Site Reference	Area (ha)	Proposal	Reason for not allocating
			for future Health Centre expansion	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.
Land west of Nelson Road and east of Station Road	GNLP1045	0.94	Residential (unspecified number)	This site is within the existing settlement limit and is currently allocated for employment use under South Norfolk Local Plan policy DIS8. The promoter is now suggesting the site for residential use and due to its proximity to Diss railway station it is considered to be a reasonable alternative if it can be shown that the employment allocation is no longer required. There are potential amenity concerns from the railway and nearby industrial uses but there is also nearby residential development. Highway requirements would include a satisfactory vehicular access into the site, plus walking and cycling links to Diss railway station. Overall, highways issues limit the scale of growth in Diss.

### Unreasonable Sites:

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
<b>Diss (including part of Roydon)</b>				
Land to the south of Prince William Way	GNLP0185	1.01	Residential (unspecified number)	This site is not considered to be suitable for allocation as it is already identified as part of existing allocation DIS1 in the South Norfolk Local Plan and as such is within the existing settlement limit. There are concerns that the estate road does not seem to extend to the site boundary and as such highway access does not seem to be available.
Land at Sturgeons Farm, off Farm Close, Louies Lane, Shelfanger Road	GNLP0362	13.81	Residential use mixed led development of approx. 413 dwellings	Although this site is adjacent to the existing settlement limit for Diss with safe pedestrian routes to schools in both Roydon and Diss it is considered to be an unsuitable site for allocation because residential development in this location would extend Diss further into the open countryside with consequential landscape impacts.
Land off Walcott Road, Walcott Green, Diss	GNLP0599	3.29	Residential (unspecified number)	This site is not considered to be suitable for allocation due to highways constraints. Residential development in this location would require road realignment and widening that does not appear achievable, along with provision of a footway at Walcot Road to the west. Development of this site would impact on the river valley and lead to an erosion of rural character.
Boundary Farm, Shelfanger Road, Heywood	GNLP0606	3.00	Residential (unspecified number)	This site is not considered to be suitable for allocation as there is no safe walking route to schools in Diss and residential development in this location would extend the built-up area of Diss further into the open countryside with consequential

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
				landscape impacts. Nearly half the site is at risk of surface water flooding which would significantly affect the developable area.
The Grange, Walcot Green, Diss	GNLP1003	2.02	Residential (unspecified number)	This site is not considered to be suitable for allocation as there is no safe walking route to local primary schools and no likelihood of being able to provide one. Residential development in this location would not be well related to the services and facilities in Diss and would extend the built-up area further into open countryside with consequential landscape impacts.
Land north of Brewer Green Lane, Roydon	GNLP1038	1.06	Residential development of approx. 8-12 dwellings	This site is not considered to be suitable for allocation as it is separated from the existing settlement limit by Diss Town Football Club. Roads in the vicinity of the site are narrow and there is no safe walking route to schools in either Roydon or Diss.
Land north of Frenze Hall Lane and west of Walcott Green, Diss	GNLP1044	10.95	Residential (unspecified number)	This site is not considered to be suitable for allocation due to highways constraints. Development would require Walcot Green to be widened to a minimum of 5.5 metres along with provision of a 2-metre wide footway between the access and Frenze Hall Road and this does not appear achievable due to land constraints at the southern end of the road. Residential development in this location would also extend the built-up area of Diss further into the open countryside with consequential landscape impacts.
West of Shelfanger Road (part in Roydon, part in Heywood)	GNLP2104	50.51	Residential development (unspecified number)	This site is not considered to be suitable for allocation because if it was developed in its entirety it would be too large for the scale of development needed in Diss. Consideration was given to

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
				whether a smaller section towards the southern end of the site may be more acceptable but there are concerns about achieving satisfactory vehicular and pedestrian access.

## **PART 2 – SUMMARY OF COMMENTS FROM THE REGULATION 18C DRAFT PLAN CONSULTATION**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0102 Land at Frontier Agriculture Ltd, Sandy Lane, Diss (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	6
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 1 Object, 4 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Members of public – two comments	Comment	Issues including: <ul style="list-style-type: none"> <li>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</li> </ul>	The retention of employment and appropriateness of residential development on this site.	Employment use is fully established on the Frontier Agriculture land. The principle of redevelopment for residential use is acceptable due to the highly sustainable location	Allocate with alterations to policy wording.

		<p>employment use and a policy to generate new work opportunities.</p> <ul style="list-style-type: none"> <li>• Conversion of this site to residential development would be contrary to the need to retain land for employment purposes. Although effectively a brownfield site, the temptation to introduce further high density housing in this area, where first families will want to extend or sell, should be resisted. Residential development of this 3.6ha (plus 1.01 ha for GLNP0185) in Diss is unjustified.</li> </ul>		<p>Allocations in Diss will only be necessary if progress ceases on the Diss &amp; District Neighbourhood Plan. The requirement for new homes in Diss is expected to remain at 400, based on the Part 1 Strategy. Yet GNLP0102 is a unique site due to its brownfield status and proximity to the railway station. Should the site become vacant, as appears likely, its redevelopment would be automatic in order to make effective use of land. On this basis GNLP0102 should be included in the GNLP rather than</p>	
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				deferred to the neighbourhood planning process.	
Diss Town Council	Object	<p>Issues including:</p> <ul style="list-style-type: none"> <li>• Need to retain and indeed expand our employment land otherwise we risk becoming a dormitory town.</li> <li>• Density of over 60 homes/ha, more than double that of any other location in Diss.</li> <li>• highway constraints -- we estimate that at least 50% and up to 70% of road traffic would turn left and</li> <li>• travel under the railway bridge and along Frenze Hall Lane.</li> <li>• Sandy Lane [Walcott Green] is very narrow between the proposed site and the bridge bordered. Constructing a suitably wide carriageway, and 2 metre wide footpath, is</li> </ul>	Issues over the principle and density of residential development in this location, as well as a variety of highways impacts.	Policy requirements to be reviewed. Such as the extent of highways improvements.	Allocate with alterations to policy wording.

		<p>not possible. On one side is the railway; on the other side is a drainage ditch.</p> <ul style="list-style-type: none"> <li>• Frenze Hall Lane is already busy. With existing and planned development 500 to 700 traffic movements a day is estimated.</li> <li>• There would also be a significant increase in traffic using the Sawmills Road/ A1066 junction which would require road improvements to aid flow on/off Victoria Road.</li> </ul>			
Anglian Water	Comment	Unlike other allocation policies there is no reference to water efficiency forming part of the design.	Consider inclusion as a site specific requirement or as a general strategic requirement of all development.	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy.	None
Norfolk Wildlife Trust	Comment	This proposal is adjacent to Frenze Beck CWS. This CWS is a vital part of local	Possible implications and mitigations on the	This matter is dealt with under Policy 3. An example being	No change to policy.



		green infrastructure with public access granted by the Waveney Rivers Trust. Adjacent housing will add to visitor pressure on the CWS and should contribute to the restoration of the CWS and management of local green infrastructure in order to avoid visitor pressure impacts on the CWS.	adjacent Frenze Beck County Wildlife site.	the policy on Recreational Impact Avoidance and Mitigation Strategy.	
Savills (UK) Ltd on behalf of Frontier Agriculture Ltd (site promoter)	Support	<p>Issues including:</p> <ul style="list-style-type: none"> <li>• Need to retain and indeed expand our employment land otherwise we risk becoming a dormitory town.</li> <li>• Fully supports the principle of the allocation of the Site for comprehensive redevelopment, but the policy should be amended to include flexibility and support for both residential or employment land uses.</li> </ul>	Flexibility of policy wording to reflect: redevelopment or continued employment use; remediation costs; uncertainty over affordable housing viability; and, highways improvements being limited to the extent of the site frontage.	<p>Policy requirements to be reviewed. Such as the extent of highways improvements. Clarification needed that the railway car park obligations does not apply to this site.</p> <p>Consideration needed of housing density. Given the town centre location, and proximity to public transport, a higher</p>	Allocate with alterations to policy wording.

		<ul style="list-style-type: none"> <li>• Policy should not impose specific requirements linked to the deliverability of affordable housing in percentage or unit terms, particularly given site remediation.</li> <li>• The policy refers to station car park expansion, and is ambiguous about it being on GNL0102 land or not, The requirement should be removed or it made clear that GNL0102 should not prejudice car park expansion on adjacent land.</li> <li>• Policy refers to widening of Sandy Lane. This should be clarified to widening to a 5.5 metre minimum along the extent of the site frontage.</li> <li>• The requirement for a 2-metre wide footway from GNL0102 northwards</li> </ul>		<p>density development should be a sought. Provided the design and layout is appropriate to the site context and character of Diss.</p>	
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		<p>to Frenze Hall Lane is not considered justified, and should be limited to the site frontage.</p> <ul style="list-style-type: none"><li>• Rewording of Policy DIS 9 is suggested to include the widening of Sandy Lane, that is moving the fifth bullet point of GNLP0102 to the wording of DIS 9.</li></ul>			
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0250/0342/0119/0291 Land north of the Cemetery, west of Shelfanger Road and East of Heywood Road, Diss (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	24
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	7 Support, 12 Object, 5 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Members of public – various	Object	<p>Issues including:</p> <ul style="list-style-type: none"> <li>• Too many houses. Busy road, flood risk, traffic, pollution, wildlife/environmental damage, no support for services like the doctors, dentists, etc, new houses will be squeezed onto narrow roads and will look unsightly.</li> <li>• Strain on services e.g. bin collections are fortnightly and landfill already heaving.</li> </ul>	Matters concerning overall strategic policy for housing in Diss, capacity of infrastructure and services, traffic constraints, landscape intrusion, and the need to expand the adjacent cemetery.	Allocations in Diss will only be necessary if progress ceases on the Diss and District Neighbourhood Plan. The requirement for new homes in Diss is expected to remain at 400,	Deferred to neighbourhood plan process.

		<p>No consideration of the once beautiful area – building ‘Lego’ houses.</p> <ul style="list-style-type: none"> <li>• Identify, allocate and gift adequate extra land for Diss cemetery. Provision for the link road, without leaving them contingent upon planning conditions.</li> <li>• Commitments for development have recently already saturated Diss without increasing facilities.</li> <li>• TRAFFIC ISSUES: Commuter times are particularly busy as workers avoid the frequently congested A1066 in order to reach the A140. Also congestion caused by cars dropping off and picking up pupils from Diss High School. A sharp bend on the Heywood Road/Burston Road junction has been an accident spot over the years.</li> </ul> <p>WILDLIFE: The Heywood Road cemetery is a haven for wildlife. COMMUNITY AMENITY: The footpaths on this field are extremely</p>		<p>based on the Part 1 Strategy.</p>	
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		<p>well used by local dog owners and Individuals and local walking groups.</p> <p><b>CEMETERY EXPANSION:</b>  Allow expansion for 50 years, not the short term.</p> <ul style="list-style-type: none"> <li>• We would ask that any development in this part of town, is built with a little more empathy to the surroundings than the current development being built on the eastern side of town. We also ask that the services available in the town, especially medical and educational, are reviewed and resourced before commencing with the GNLP proposed house construction, that could give rise to a 20% population growth in the town.</li> <li>• We would ask that any development in this part of town, is built with a little more empathy to the surroundings than the current development being built on the eastern side of town. We also ask that the services available in the</li> </ul>			
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		<p>town, especially medical and educational, are reviewed and resourced before commencing with the GNLP proposed house construction, that could give rise to a 20% population growth in the town.</p> <ul style="list-style-type: none"> <li>• A combination of factors make the suite unsuitable for highways reasons -- bends on Shelfanger Road and very busy junction with Walcot Rd (with High School)/ Shelfanger Rd/Mount St (single track).</li> <li>• Concerns over habitat and higher emissions in the context of climate change. Need to preserve trails for people who enjoy walking.</li> </ul>			
Members of public – various	Support	<p>Building houses on these four sites (GNLP0250/0342/0119/0291) seems to us to be entirely reasonable, although it will mean that the northern boundary of the town is extended into open countryside. Further comments challenge what was ruled out as well as</p>	<p>Ruling out GNLP0362 and GNLP2104 on landscape grounds is queried given the similarities and proximity to GNLP0250/0342/0119/0291. Whether GNLP0341 should be “unreasonable”.</p>	Noted	Deferred to neighbourhood plan process.

		what was put forward. This includes justifications for ruling out GNLP0362 and GNLP2104, as well justifications for considering development on The Fields (GNLP0341).			
Diss Town Council	Support	We agreed with the GNLP especially as this was an area they were already looking at. It was seen as an option that gives a west to east link road connecting Shelfanger Road to Heywood Road and that it would help alleviate traffic pressures in the north of the town especially on roads such as Sunnyside. We were also pleased to see the GNLP recognised our earlier submissions about the need to expand the cemetery. Recommendation: That Diss Town Council support this preferred GNLP option.	Matters to investigate: <ul style="list-style-type: none"> <li>• Negotiation of highway scheme.</li> <li>• Negotiation of burial land contribution.</li> </ul>	Noted	Deferred to neighbourhood plan process.
Anglian Water	Comment	Unlike other allocation policies there is no reference to water efficiency forming part of the design.	Consider inclusion as a site specific requirement or as a general strategic requirement of all development.	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to	Deferred to neighbourhood plan process.



				include it in the allocation policy	
Strutt & Parker LLP on behalf of Scott Properties (site promoters)	Support	<p>Issues including:</p> <ul style="list-style-type: none"> <li>• recommends that site reference GNLP0119 is excluded from the policy and is not put forward as an allocation or part of the wider site. The site has recently changed ownership and would not form a viable portion to bring forward with the wider site given its existing residential use and value. In addition to this, it is not possible to achieve sufficient visibility splays to achieve a separate vehicular access, which further impacts its viability to be brought forward.</li> <li>• Scott Properties are actively engaging with the Landowners of GNLP0250 and have already agreed terms with GNLP0291.</li> <li>• Provision of an area of c. 3.4 acres (at 800 burial plots per acre) at nil cost to the Town Council could</li> </ul>	<p>Matters to investigate:</p> <ul style="list-style-type: none"> <li>• Remove GNLP0119.</li> </ul>	Noted	Deferred to neighbourhood plan process.

		<p>impact on the viability of the site and the ability of the site to deliver at least 200 dwellings as per the allocation wording. My client would question the extent to which projected future burial needs well into the next century and beyond the Local Plan period should be prioritised over the need to deliver housing to meet the identified needs during the Local Plan period. The Masterplan proposes an area of 1.2 acres which would provide an additional c. 20 years supply (as per the Local Plan period), and we would welcome further discussions with the Town Council and GNLP Team on this subject.</p> <ul style="list-style-type: none"> <li>• Details on the site schematic plan on the associated road and pedestrian connections as well as the plans to retain and enhance the existing Public Rights of Way</li> </ul>	<ul style="list-style-type: none"> <li>• Agree a proportionate contribution to burial land.</li> <li>• Identifying link road route and securing other highways improvements in policy.</li> </ul>		
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		<p>(PROW) to the north and west of the site.</p> <ul style="list-style-type: none"> <li>• The aim of providing a vehicular connection between Shelfanger Road and Heywood Road is supported, as it will improve connectivity to the north of the Diss and provide a degree of relief to Sunnyside from vehicle users who would otherwise need to take this route.</li> <li>• The site is located within Flood Zone 1 and as such, flood risk at the site is considered to be low to negligible. However, it is noted that once the proposed development introduces new paved areas, the surface run off will increase and require management. Flood Risk Assessments and Surface Water Drainage Strategies required at the planning application.</li> <li>• A Landscape Constraints and Opportunities Appraisal Plan has been prepared by Lockhart Garratt and</li> </ul>	<ul style="list-style-type: none"> <li>• Consultation and agreement needed from the Highways Authority.</li> <li>• Requirement for SUDs needed in policy</li> <li>• Policy wording for protecting or re-routing public rights of way.</li> </ul>		
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		<p>provides an indicative landscape plan, outlining the location of retained PROW's, developable areas within the wider allocation and potential access points.</p> <ul style="list-style-type: none"> <li>• The location of the high pressure pipeline as referred to within the policy, located adjacent to the northern boundary of the site, and applicable the 14.3m Building Proximity Distance (confirmed by Cadent) where no buildings may be constructed.</li> <li>• Initial discussions have taken place with private house builders who have expressed an interest in purchasing the site on either an unconditional (post planning) or subject to planning basis. An updated planning and delivery strategy will be agreed following pre-application advice and public consultation.</li> </ul>	<ul style="list-style-type: none"> <li>• Policy wording to safeguard the route of the high-pressure pipeline.</li> <li>• Details for the Statement of Common Ground.</li> </ul>		
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0341 Land between Shelfanger Road and Mount Street, Diss (Reasonable Alternative Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	47
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 support, 43 Object 4 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Members of public – various – all opposed to allocating GNLP0341 for residential development	Object	Issues including: <ul style="list-style-type: none"> <li>• A Local Green Space - it is unique to Diss.</li> <li>• Cultural heritage, in 1964, John Betjeman (later Poet Laureate) referred to the site as “A bit of country coming right into the town - a little park”.</li> <li>• In 1997, this parcel of land was recorded in the Norfolk Gardens Survey Report, commissioned by English Heritage, and</li> </ul>	Issues including: <ul style="list-style-type: none"> <li>• The public opinion against development.</li> <li>• Consideration of the site’s current status in the South Norfolk Local Plan as ‘Important Local Open Space’.</li> <li>• The site’s status in the Norfolk Historic Environment Record as NHER.33463.</li> </ul>	Allocations in Diss will only be necessary if progress ceases on the Diss and District Neighbourhood Plan. The requirement for new homes in Diss is expected to remain at 400, based on the Part 1 Strategy.	Deferred to neighbourhood plan process.

		<p>given a Grade** (regional importance) listing. In 1998, it was designated as Norfolk Historic Environment Record site 33463, '</p> <ul style="list-style-type: none"> <li>• The group Parish Fields Friends has launched two petitions which have collected more than 2,600 signatures against construction of dwellings on Parish Fields.</li> <li>• In August 2019, Diss and District Neighbourhood Plan consultants AECOM rated Parish Fields “red” for development.</li> <li>• Biodiversity Action Plan priority habitat 'Wood-pasture and Parkland'. It incorporates a number of large oak trees (some evidently over 200 years old).</li> <li>• The present area (approximately 3 ha) was landscaped late in the 18<sup>th</sup> century to form The Lawn, a wooded landscape parkland for The Cedars, a prominent</li> </ul>	<ul style="list-style-type: none"> <li>• Likely designation in the Neighbourhood Plan as a Local Green Space.</li> <li>• Status as UK biodiversity priority habitat 'Wood-Pasture and Parkland'.</li> <li>• The need for further ecological studies.</li> <li>• Investigate other brownfield sites, mixed-use development options, and improved bus travel, and improved car parking solutions.</li> </ul>	<p>Site unlikely to be allocated, due to consultation concerns raised..</p>	
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		<p>town house across Mount Street which stands today. (Norfolk Historic Environment register as NHER 33463)</p> <ul style="list-style-type: none"> <li>• Pedestrian access to the town between Shelfanger Court and St Nicholas Street is rather hazardous and not suitable for wheelchair users. The junction with Roydon Road is also very difficult for wheelchair/mobility scooter users.</li> <li>• A bat survey undertaken in July 2019 identified that no fewer than eight species used the site for feeding.</li> <li>• Brownfield sites should be developed before considering greenfield development, referencing the CPRE Norfolk campaign.</li> <li>• It has prime potential for acquisition by Diss Council as an open space for encouraging nature to thrive close to the town.</li> </ul>			
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		<ul style="list-style-type: none"> <li>• The need for giving GNLP0341 “alternative” status is only necessary because you – the planners – have rejected at least two larger sites for what would seem to be inadequate, if not specious, reasons. GNLP0341 is qualitatively different to any other site in Diss. Its astonishing that the GNLP Team repeat the propaganda of the developers; and, is unethical.</li> <li>• Developing GNLP0341 would be contrary to GNLP principles:             <ol style="list-style-type: none"> <li>1. ‘Identify land that should be protected from development.’</li> <li>2. ensure the ‘Infrastructure includes a wide range of facilities and services such as: green spaces.’</li> </ol> </li> <li>• 2,600 people object to any development on Parish Fields, respect their wishes. As an alternative vision, reclaim</li> </ul>			
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		all brownfield sites, promote spaces for business start-ups and community facilities; encourage bus travel, and install car park stacking systems.			
Diss & District Neighbourhood Plan Steering Group	Object	<p>Issues including:</p> <ul style="list-style-type: none"> <li>• The Steering Group is attempting to afford Parish Fields the greatest level of protection possible from development.</li> <li>• A local historian and heritage expert is giving ongoing support to evidence the considerable heritage credentials of Parish Fields.</li> <li>• 1964 John Betjeman (later Poet Laureate) visited Diss to make a film called 'Something about Diss', and he remarked on The Lawn. "On the other side of Mount Street do you see that bit of country? ... A bit of country coming right into the town - a little park".</li> </ul>	Continued engagement with community planning colleagues, and the Neighbourhood Plan Steering Group directly.	Site not to be allocated under GNLP. Note comment about the Diss and District Neighbourhood allocating sites to meet the future development needs of the Town.	Deferred to neighbourhood plan process.

		<ul style="list-style-type: none"> <li>• 1980s Commander Patrick Taylor died and The Lawn area was sold to WBA Gaze &amp; Sons. The site is still used for grazing cattle. The Parish Fields area was also sold, one part to Diss Town Council (for the Health Centre) and the other to South Norfolk Council (for the Youth Centre, two car parks and the Citizens Advice Bureau).</li> <li>• 1997 The Lawn recorded in the Norfolk Gardens Survey Report, commissioned by English Heritage, and given a Grade** (regional importance) listing.</li> <li>• 1998 'The Cedars and The Lawn' designated as Norfolk Historic Environment Record site 33463, 'The only example of a detached landscape park within a town in Norfolk'.</li> </ul>			
Strutt & Parker LLP on behalf of	Object	<p>Issues including:</p> <ul style="list-style-type: none"> <li>• Scott Properties has prepared a scheme for</li> </ul>	Whether Scott Properties can negotiate an alternative scheme that is	Site not to be allocated under GNLP. Note	Deferred to neighbourhood plan process.

<p>Scott Properties (site promoters)</p>		<p>the site that would see it developed for a modest development of 24 retirement bungalows.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• Scott Properties has been working with Natural England on a steering group for developing a Nature Toolkit for small and medium sizes sites, and early indications</li> </ul>	<p>acceptable to the Neighbourhood Plan Steering Group and Town Council; and, provides benefits in terms of public access to Parish Fields and biodiversity net gain.</p>	<p>comment about the Diss and District Neighbourhood allocating sites to meet the future development needs of the Town.</p>	
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		<p>show that a significant increase in biodiversity net gain (20%+) could be achieved through sensitive development of the site alongside targeted new habitat creation.</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul>			
Norfolk Geodiversity Partnership	Object	<p>Issues including:</p> <ul style="list-style-type: none"> <li>• Listed in the South Norfolk Local Plan as 'Important Local Open Space'</li> <li>• Listed in the Norfolk Historic Environment Record as NHER.33463 as 'The only example of a detached landscape park within a town in Norfolk',</li> </ul>		Site not to be allocated under GNLP. Note comment about the Diss and District Neighbourhood allocating sites to meet the future development needs of the Town.	Deferred to neighbourhood plan process.

		<p>and this status is endorsed by a Norfolk Gardens Trust survey report, 1997 (funded by English Heritage) and the landscape historian Professor Tom Williamson.</p> <ul style="list-style-type: none"> <li>• Submitted as a candidate site for listing by Historic England as a rare example of a detached landscape park in a market town setting (case pending).</li> <li>• A candidate for 'Local Green Space' designation in the forthcoming Diss &amp; District Neighbourhood Plan.</li> <li>• A significant wildlife reservoir and network linked to local gardens, for instance a bat survey undertaken in July 2019 showed that no less than eight species used the site for feeding.</li> <li>• A notable Green Infrastructure asset which is part of the 'green</li> </ul>			
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		<p>corridor' linking Diss with its rural hinterland.</p> <ul style="list-style-type: none"> <li>• An example of the UK biodiversity priority habitat 'Wood-Pasture and Parkland'. Noted by Poet Laureate John Betjeman in his film about Diss (1964) as integral to the character of the market town and its rural links, being 'a little bit of country coming right into town', as he put it.</li> </ul>			
Diss Town Council	Object	<p>We were surprised to see the site recommendation has been changed from unsuitable to a reasonable alternative. This greenfield site is identified as an important open space in the South Norfolk Local Plan. It is also recognised by Norfolk County Council as an Historic Environment Site NHER 33463. The site is a very historic open space within the Conservation Area, with strong historic links to 60 Mount Street (the only</p>		<p>Site not to be allocated under GNLP. Note comment about the Diss and District Neighbourhood allocating sites to meet the future development needs of the Town.</p>	<p>Deferred to neighbourhood plan process.</p>

		detached landscape park in Norfolk) and other listed buildings. We agree with the initial GNLP conclusion that development would clearly adversely affect the openness of the area. Diss Town Council would not support development on this site and the loss of any of this historic important open space.			
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP1045 Land west of Nelson Road and east of Station Road, Diss (Reasonable Alternative Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	6
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	2 Support, 2 Object, 2 Comment (one of which was a second additional comment from Diss Town Council)

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of public	Support	GNLP.1045 is suitable for high-density housing development, perhaps over 50 units per hectare, given its low landscape conservation value and proximity to the railway station. Since there are limiting factors to the scale of housing growth possible elsewhere in Diss, this site is a prime candidate for high density development. It is one of the only sites where this kind of	Investigate opportunity for higher density, efficient use of land in a sustainable location, with fewer landscape constraints than on the edge of Diss.	Site not to be allocated under GNLP. Note comment about the Diss and District Neighbourhood allocating sites to meet the future development needs of the Town.	Deferred to neighbourhood plan process.



		development would be justified in landscape terms. Also, Diss needs to maximise the number of housing units at sites such as this to mitigate adverse impacts elsewhere on more sensitive sites.			
Members of public – various	Object	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.	Consider the compatibility of uses and need for employment land.	Site not to be allocated under GNLP. Note comment about the Diss and District Neighbourhood allocating sites to meet the future development needs of the Town.	Deferred to neighbourhood plan process.
Members of public - various	Comment	Conversion of this site to residential development is contrary to the need to retain land for employment purposes.	Investigate principle/need of retaining employment use.	Site not to be allocated under GNLP. Note comment about the Diss and District Neighbourhood allocating sites to meet the future development needs of the Town.	Deferred to neighbourhood plan process.

Diss Town Council	Support (as well as a second additional comment)	Diss Town Council would support the change of use to residential providing the density of development is no more than that of the adjacent estate, i.e. 25 to 30 per ha.	Consider the form and density of development.	Site not to be allocated under GNLP. Note comment about the Diss and District Neighbourhood allocating sites to meet the future development needs of the Town.	Deferred to neighbourhood plan process.
Pigeon Investment Management Ltd (site promoter)	Object	<p>Issues including:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul>	<p>Issues including:</p> <ul style="list-style-type: none"> <li>• The principle of residential use.</li> <li>• Vehicular access from Nelson Road.</li> <li>• A pedestrian/cycle link between Nelson Road and Prince Regent Way.</li> <li>• Mitigation of noise from railway.</li> </ul>	Site not to be allocated under GNLP. Note comment about the Diss and District Neighbourhood allocating sites to meet the future development needs of the Town.	Deferred to neighbourhood plan process.

		<p>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.</p> <ul style="list-style-type: none"> <li>• 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'.</li> <li>• Highways: The Site would be served from Nelson Road with suitable provision for off-street parking provided within the Site.</li> <li>• Noise and Amenity: The Norwich to London railway line is located to the west of the Site. In order to ensure an appropriate noise</li> </ul>			
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		<p>environment for future residents, acoustic design measures would be incorporated within the scheme design.</p> <ul style="list-style-type: none"> <li>• Utilities and Services: The Site will make best use of the existing infrastructure located within close proximity to the Site.</li> <li>• Flood Risk: The Site is located in Flood Zone 1</li> <li>• There is a residual need for 1,826 residential institution bedspaces in the period 2018-36, comprising 1,081 in Broadland, 57 in Norwich and 679 in South Norfolk. 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.</li> </ul>			
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0185 Land to the south of Prince William Way, Diss (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 Object, 0 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Members of public	Support	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.	The principle of residential development near to employment uses.	Site not to be allocated under GNLP. Note comment about the Diss and District Neighbourhood allocating sites to meet the future development needs of the Town.	None  Deferred to neighbourhood plan process.

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0362 Land at Sturgeons Farm, off Farm Close, Louies Lane, Shelfanger Road, Diss (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	4
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	2 Support, 2 Object, 0 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Members of public – two comments	Object	Issues including: <ul style="list-style-type: none"> <li>The argument that building houses on site 0362 would have “consequential landscape impacts” (a clumsy euphemism for spoiling the view) applies with equal force to houses built on the fields between Heywood Road and Shelfanger Road. [If Diss needs more land for housing, sites like GNLP0362</li> </ul>	Issues including: <ul style="list-style-type: none"> <li>GNLP0362 is no worse than other greenfield sites preferred by the GNLP Team, and that it would be better instead to protect GNLP0341 (Parish Fields).</li> <li>If it is inevitable that Diss must provide new housing it is better to extend into the countryside where</li> </ul>	Site not to be allocated under GNLP. Note comment about the Diss and District Neighbourhood allocating sites to meet the future development needs of the Town.	None  Deferred to neighbourhood plan process.

		<p>should be preferred ahead of GNLP0341 (Parish Fields) that has a much higher value in terms of landscape within the town, heritage importance, and ecological sensitivity.]</p> <ul style="list-style-type: none"> <li>• This site should be considered suitable for development, as its landscape impacts are no more adverse than for the nearby site GNLP0342 (Land East of Shelfanger Road). It seems perverse to claim that they are. It is inevitable that Diss will have to be extended 'further into the open countryside' if the high housing allocation for the town (743 houses by 2038) is to be met. It is best to do so upon arable sites such as this one which have low historical and ecological value. Impacts on 'open countryside' and wildlife</li> </ul>	<p>mitigations can be provided, and to use land of lower ecological and historical importance.</p>		
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		can be mitigated by good landscape design.			
Members of public	Support	This site presents a wholly inappropriate location for a housing invasion. The site is situated in Roydon parish but the adjacent B1077 leads into Diss as a minor road into a busy area of the town. The potential for over 400 properties at a high density far exceeds the projected maximum number of 10-20 for the whole of Roydon. Rural countryside enjoyed by present residents would be destroyed.	Issues including: <ul style="list-style-type: none"> <li>• Inappropriate access immediately adjacent to the site and wider network considerations on the B1077 into Diss.</li> <li>• That GNL0362 is in the administrative boundary of Roydon and thus inappropriate to the 10-20 homes required in Roydon.</li> <li>• Loss of countryside.</li> </ul>	Site not to be allocated under GNL0. Note comment about the Diss and District Neighbourhood allocating sites to meet the future development needs of the Town.	None  Deferred to neighbourhood plan process.
Diss Town Council	Support	We agree with your assessment of unsuitable as any development would extend Diss further into the open countryside and be too far away from the main services.	Investigate landscape impact and distance to main services.	Support noted	None



<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0599 Land off Walcott Road, Walcott Green, Diss (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	4
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 1 Object, 2 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of public	Object	This site should be considered partly suitable for development. Clearly the character of the hamlet of Walcot Green and the 'green space' between it and the eastern edge of Diss are valuable in landscape conservation terms, however the high housing allocation for Diss (743 houses by 2038) and the shortage of developable land mean that part of this site, at	Consider partial development of the site, to meet housing need, that the railway provides screening of the site from the landscape valley, and that with more investigation highways constraints may not be insurmountable.	Site not to be allocated under GNLP. Note comment about the Diss and District Neighbourhood allocating sites to meet the future development needs of the Town.	None  Deferred to neighbourhood plan process.

		<p>least, should not be ruled out. It is said that highways modifications do not 'appear achievable', but that implies they may only be an apparent problem. GNLP.0599 would not impact on the valley landscape because lies beyond the railway embankment.</p>			
Members of public -- two	Comment	<p>Issues including:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• There is too much development in this rural area already which has overloaded the infrastructure of Diss.</li> </ul>	Investigate the distinct design character of Walcot Green, rather than treating the site as an extension to Diss.	Site not to be allocated under GNLP. Note comment about the Diss and District Neighbourhood allocating sites to meet the future development needs of the Town.	<p>None</p> <p>Deferred to neighbourhood plan process.</p>

Diss Town Council	Support	<p>We are in full agreement with both the GNLP and AECOM that highway constraints make this site unsuitable. It is very rural and remote from the existing services and would have a visual impact on the adjacent nursing home. There is restricted visibility with 2 bends on the very narrow road and no pavements. It is unlikely that satisfactory road re-alignment, widening and the provision of pavements could be achieved. However, we currently have a speculative outline planning application 2019/1555 for this site for 94 dwellings which we are opposing.</p>	<p>Issues including:</p> <ul style="list-style-type: none"> <li>• Assessed as unsuitable under the Neighbourhood Plan process.</li> <li>• Visual impact on adjacent nursing home.</li> <li>• Highways constraints – carriageway width, alignment, and no footpath provision.</li> </ul>	<p>Site not to be allocated under GNLP. Note comment about the Diss and District Neighbourhood allocating sites to meet the future development needs of the Town.</p>	<p>None</p> <p>Deferred to neighbourhood plan process.</p>
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0606 Boundary Farm, Shelfanger Road, Heywood (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	4
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	2 Support, 2 Object, 0 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of public	Support	Development here on the outskirts of Roydon parish is incompatible with a sustainable population of Diss.		Site not to be allocated under GNLP. Note comment about the Diss and District Neighbourhood allocating sites to meet the future development needs of the Town.	None  Deferred to neighbourhood plan process.

Member of public	Object	<p>This site is a suitable candidate for partial development. The East Anglian clayland landscape typically has a dispersed rather than a nucleated settlement pattern. The emphasis being place by the GNLP on promoting a nucleated pattern, with big housing concentrations, is detrimental to the landscape character of the area. Small dispersed housing development at sites such as GNLP0606 could make a modest contribution to meeting housing targets while respecting landscape character. Visual landscape impacts can be mitigated by landscape design. Walking routes to schools do not exist for other parts e.g. The Heywood, so are not a necessity here.</p>	<p>Partial development could be suitable because:</p> <ul style="list-style-type: none"> <li>• Dispersed settlement patterns are more in character with the area than a nucleated approach.</li> <li>• Whether footpaths to schools are so important in assessing site, as not all existing locations have them.</li> </ul>	<p>Site not to be allocated under GNLP. Note comment about the Diss and District Neighbourhood allocating sites to meet the future development needs of the Town.</p>	<p>None</p> <p>Deferred to neighbourhood plan process.</p>
Clarke and Simpson (site promoters)	Object	<p>Issues including</p> <ul style="list-style-type: none"> <li>• The south of the field does have a good vehicular access.</li> </ul>	<p>Considerations of a suitable access arrangement being achievable off Factory</p>	<p>Site not to be allocated under GNLP. Note comment about the</p>	<p>None</p>

		<p>Factory Lane to the east is a two way public highway with footpaths which continues until the south east corner of the proposed development site.</p> <ul style="list-style-type: none"> <li>• The development has sufficient space for a new entrance off Factory Lane.</li> <li>• It is questionable that the timeframe for delivery of GNLP0102 can practically take place as a whole and therefore unlikely that 200 homes would be achievable.</li> <li>• There is a limit on the number of open spaces within the town of Diss and it is understood town greatly values the open space existing currently in GNLP0341 (Parish Fields).</li> <li>• Reconsider the partial allocation of GNLP2104 or GNLP0606. The land</li> </ul>	<p>Lane; that an alternative is to allocate part of GNLP0606; that other preferred sites are similar in their planning constraints; that other sites may not come forward as quickly as expected; as well as opposition to developing sites like GNLP0341 (Parish Fields).</p>	<p>Diss and District Neighbourhood allocating sites to meet the future development needs of the Town.</p>	<p>Deferred to neighbourhood plan process.</p>
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		to the south can comfortably accommodate 200 units or greater or less if required with 33% affordable and open space in addition to leisure facilities if required.			
Diss Town Council	Support	This site is unsuitable as a large proportion of the site is at risk of flooding. Development of this site would extend the built-up area of Diss into the open countryside. There is no safe walking route to schools in Diss.	Investigate extent of flood risk constraining the developable area, as well as landscape and access to school considerations.	Support noted	None

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP1003 The Grange, Walcot Green, Diss (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	4
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 1 Object, 2 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Members of public – two comments	Comment	Issues including: <ul style="list-style-type: none"> <li>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</li> </ul>	Investigate the distinct design character of Walcot Green, rather than treating the site as an extension to Diss.	Site not to be allocated under GNLP. Note comment about the Diss and District Neighbourhood allocating sites to meet the future development needs of the Town.	None  Deferred to neighbourhood plan process.



		<ul style="list-style-type: none"> <li>• There is too much proposed development in this area already which has overloaded the infrastructure of Diss.</li> </ul>			
Member of public	Object	<p>While housing development at this site would adversely affect the present layout of the hamlet of Walcot Green, the site is suitable for limited housing development that respects the dispersed nature of settlement here and local ecological sensitivities. 'Safe walking routes' to local schools do not exist in most rural parts of the Norfolk and Suffolk clayland landscape, owing to the essentially dispersed settlement pattern. The same is true of Walcot Green, so it seems perverse to apply considerations of nucleated, urban planning to this locality. It is inevitable that Diss will</p>	<p>Partial development could be suitable because:</p> <ul style="list-style-type: none"> <li>• Dispersed settlement patterns are more in character with the area than a nucleated approach.</li> <li>• Whether footpaths to schools are so important in assessing site, as not all existing locations have them.</li> </ul>	<p>Site not to be allocated under GNLP. Note comment about the Diss and District Neighbourhood allocating sites to meet the future development needs of the Town.</p>	<p>None</p> <p>Deferred to neighbourhood plan process.</p>

		have to be extended further into open countryside if its housing allocation (743 houses by 2038) is to be met without damaging more sensitive sites or building at much higher densities.			
Diss Town Council	support	This site is outside the settlement boundary. It is located in a bend in the road with no safe walking access. We agree with both AECOM and the GNLP that the significant highway constraints make this site unsuitable for development.	Issues including: <ul style="list-style-type: none"> <li>Assessed as unsuitable under the Neighbourhood Plan process.</li> <li>Highways constraints – carriageway width, alignment, and no footpath provision.</li> </ul>	Support noted	None

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP1038 Land north of Brewer Green Lane, Roydon (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	3 Support, 0 Object, 0 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Members of public – two comments	Support	Issues including: <ul style="list-style-type: none"> <li>This wedge of agricultural land is bounded by two single track lanes and Diss football club. Access from either lanes is suitable only for agricultural traffic, although an extra access gateway was recently added. The site was owned for many years by a Quaker Trust and provides a strategic buffer of green space between</li> </ul>	Issues including: <ul style="list-style-type: none"> <li>Adjoining lanes are unsuitable to allow development.</li> <li>Possible loss of an important landscape gap and ecological corridor between separating the Brewer's Green part of Roydon and the western edge of the Diss</li> </ul>	Site not to be allocated under GNLP. Note comment about the Diss and District Neighbourhood allocating sites to meet the future development needs of the Town.	None  Deferred to neighbourhood plan process.

		<p>Diss town and Roydon village. Any housing here would be priced well above the 'affordable' category. Its presence, and regular access, would completely destroy a unique rural area, sited near agricultural fields and a wildlife site.</p> <ul style="list-style-type: none"> <li>• This site is important in landscape terms for separating Brewer's Green part of Roydon and the western edge of the Diss / Roydon East built-up area. It has visual landscape value as a 'green belt' buffer, and provides elements of ecological connectivity as a wildlife corridor.</li> </ul>			
Diss Town Council	Support	Development on this site would close the settlement gap between Diss and Roydon. Roads around this site are all very narrow and there are no safe walking routes to schools in Roydon	<p>Issues including:</p> <ul style="list-style-type: none"> <li>• Loss of landscape gap between the settlements of Diss and Roydon.</li> <li>• Highways constraints –</li> </ul>	Support noted	None

		and Diss. This site is unsuitable for development.	carriageway width, alignment, and no footpath provision.		
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP1044 Land north of Frenze Hall Lane and west of Walcott Green, Diss (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	5
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 2 Object, 2 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of public	Object	This site is partly suitable for development. The access point has not been defined, so it cannot be argued that highways constraints are insuperable obstacles to developing this site. They could be mitigated if the scale and layout of the proposed development were altered. The landscape impacts are likely to be no more adverse than for GNLP.0342 on open	<ul style="list-style-type: none"> <li>Investigate if highways constraints can be overcome with a smaller scheme; and, given the housing requirement of Diss, investigate if development into the countryside on arable sites offers more opportunities for mitigation than</li> </ul>	Site not to be allocated under GNLP. Note comment about the Diss and District Neighbourhood allocating sites to meet the future development needs of the Town.	None  Deferred to neighbourhood plan process.

		farmland. It is inevitable that Diss will have to be extended 'further into the open countryside' if its housing allocation (743 houses by 2038) is to be met. It is best to do so upon arable sites like this which have low historical and ecological value. Impacts on 'open countryside' can be mitigated by landscape design.	selecting GNLP0341 (Parish Fields).		
Members of public – two comments	Comment	<p>Issues including:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• There is too much development in this northern area which has</li> </ul>	<ul style="list-style-type: none"> <li>• Investigate the design character of Walcot Green, rather than treating sites as add-ons for Diss.</li> </ul>	Site not to be allocated under GNLP. Note comment about the Diss and District Neighbourhood allocating sites to meet the future development needs of the Town.	<p>None</p> <p>Deferred to neighbourhood plan process.</p>

		already overloaded the infrastructure of Diss.			
Pegasus Group on behalf of Pigeon Investment Management Ltd (site promoters)	Object	<p>Issues including:</p> <ul style="list-style-type: none"> <li>• 120 new homes, including affordable homes and bungalows plus around 10 self-build plots</li> <li>• New strategic landscaping providing a permanent buffer to ensure separation between Diss and Walcot Green hamlet.</li> <li>• Walcot Green Lane is currently a single lane, the road will be widened (including the junction with Frenze Hall Lane) to a full two lane road.</li> <li>• Rights are reserved over the residential development (Orchard Croft) immediately to the south for a link to the loop estate road (Harrier Way), this link will be incorporated into the scheme to provide a pedestrian/ cycle link,</li> </ul>	Conduct further appraisal of the site, based on the new lower proposal of 120 homes and the new information submitted. Key issues are highways, landscape, and drainage.	Site not to be allocated under GNLP. Note comment about the Diss and District Neighbourhood allocating sites to meet the future development needs of the Town.	<p>None</p> <p>Deferred to neighbourhood plan process.</p>



		<p>and also as an emergency second point of access to the Site.</p> <ul style="list-style-type: none"> <li>• All highway works can be carried out within existing highway land, or land within the control of the Landowners.</li> <li>• The scheme proposes soakaways and permeable paving, and a attenuation basin designed to accommodate the 100 year storm event with allowance for climate change at the site's south-eastern corner. Drainage from the basin will go to the surface water drain in Frenze Hall Lane with this pipe discharging to the ditch network east of the railway and to the River Frenze.</li> <li>• The scheme has been designed with the proposed self-build plots set back from the</li> </ul>			
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		<p>railway line with an extensive area of open space and new landscaping.</p> <ul style="list-style-type: none"> <li>• New footpath links will be provided, creating links with the existing PROW network and a new circular walk</li> <li>• There are two Grade II listed buildings on Walcot Road, approximately 250m north / northwest of site, located within Walcot Green Hamlet. However, both properties have clearly defined landscape boundaries and do not present a constraint to development.</li> <li>• The Landowners have entered into a partnership with Pigeon to progress the Site through the planning process and the Site can deliver homes within the forthcoming five years.</li> </ul>			
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		<ul style="list-style-type: none"> <li>The Site has been considered in the SA as providing a total of 289 dwellings plus the form of development proposed in the Sites Assessment booklet is different to that now being proposed by Pigeon at the site for 120 homes including bungalows and affordable dwellings plus up to 10 custom/self-build dwellings with considerable public open space and green infrastructure improvements.</li> </ul>			
Diss Town Council	Support	Site is adjacent to railway line with a narrow road Walcot Green which can't be widened due to highway constraints including a gas main. Residential development would also extend the built-up area of Diss further into open countryside. We agree with the GNLP and AECOM		Support noted	None

		assessment that it is unsuitable for allocation.			
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2104 West of Shelfanger Road (part in Roydon, part in Heywood) (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	5
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	2 Support, 3 Object, 0 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Members of public – two comments	Object	<p>Issues including:</p> <ul style="list-style-type: none"> <li>• One of the strongest reasons why site GNLP2104 should be re-considered is that it is a very short walk – even for small children - between the southern boundary of the site to Roydon Primary School.</li> <li>• If new roads can be constructed for the preferred site GNLP0250, 0342, 0119 and 0291 We find it hard</li> </ul>	Matters to investigate are: Access to nearby schools; why highways improvements are ruled out; and, why the site cannot be considered at least in part.	Site not to be allocated under GNLP. Note comment about the Diss and District Neighbourhood allocating sites to meet the future development needs of the Town.	<p>None</p> <p>Deferred to neighbourhood plan process.</p>

		<p>to believe that comparable road access to site 2104 is not possible.</p> <ul style="list-style-type: none"> <li>• Given the GNLP's purpose of finding land for housing it appears absurd to reject a site for being too big, and not to consider allocating it in part.</li> <li>• This site is very important in landscape terms for separating the Brewer's Green part of Roydon and the housing estates in Diss/Roydon East. The site may be partly suitable for housing development. Existing housing in the Factory Lane area enjoys unproblematic vehicular and pedestrian access. Any development here would have to enhance ecological connectivity and safeguard visual impact when seen from Factory Lane.</li> </ul>			
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Members of public - various	Support	This is a completely inappropriate agricultural site for swamping both Roydon and Diss with housing with a population explosion.		Support noted	None
Clarke and Simpson (site promoters)	Object	<p>Issues including</p> <ul style="list-style-type: none"> <li>• The south of the field does have a good vehicular access. Factory Lane to the east is a two way public highway with footpaths which continues until the south east corner of the proposed development site.</li> <li>• The development has sufficient space for a new entrance off Factory Lane.</li> <li>• It is questionable that the timeframe for delivery of GNLP0102 can practically take place as a whole and therefore unlikely that 200 homes would be achievable.</li> <li>• There is a limit on the number of open spaces</li> </ul>	<p>Considerations of a suitable access arrangement being achievable off Factory Lane; that an alternative is to allocate part of GNLP0606; that other preferred sites are similar in their planning constraints; that other sites may not come forward as quickly as expected; as well as opposition to developing sites like GNLP0341 (Parish Fields).</p>	<p>Site not to be allocated under GNLP. Note comment about the Diss and District Neighbourhood allocating sites to meet the future development needs of the Town</p>	<p>None</p> <p>Deferred to neighbourhood plan process.</p>

		<p>within the town of Diss and it is understood town greatly values the open space existing currently in GNLP0341 (Parish Fields).</p> <ul style="list-style-type: none"> <li>• Reconsider the partial allocation of GNLP2104 or GNLP0606. The land to the south can comfortably accommodate 200 units or greater or less if required with 33% affordable and open space in addition to leisure facilities if required.</li> </ul>			
Diss Town Council	Support	This very large site would alter the character of the settlements of Diss and Roydon. It is too large a scale for the development required in Diss. The road network is unsuitable both in terms of junction capacity and also lack of footpaths.		Support noted	None



**PART 3 - ASSESSMENT OF NEW & REVISED SITES SUBMITTED  
DURING THE REGULATION 18C CONSULTATION**

**STAGE 1 – LIST OF NEW &REVISED SITES PROMOTED IN THE SETTLEMENT**

**LIST OF SITES TO BE CONSIDERED FOR RESIDENTIAL/MIXED USE  
ALLOCATION (0.5 HECTARES OR LARGER)**

<b>Address</b>	<b>Site Reference</b>	<b>Area (ha)</b>	<b>Proposal</b>	<b>Status</b>
<b>Diss</b>				
Land north of Frenze Hall Lane and West of Walcot Green	GNLP1044R	10.29	Housing	Unreasonable
Tottington Lane	GNLP4010	1.07	10+ dwellings	New Site
South of Burston Road	GNLP4049	20.49	Housing (and school on rep not form)	New Site
<b>TOTAL</b>		<b>31.85</b>		

**STAGE 2 – HELAA COMPARISON TABLE**

	Categories													
	Site access	Access to services	Utilities Capacity	Utilities Infrastructure	Contamination/ground stability	Flood Risk	Market attractiveness	significant landscapes	Sensitive townscapes	Biodiversity & Geodiversity	Historic environment	Open Space and GI	Transport & Roads	Compatibility with neighbouring uses
Site Reference														
Diss														
GNLP1044R	Amber	Green	Amber	Amber	Green	Amber	Green	Amber	Amber	Amber	Amber	Green	Amber	Amber
GNLP4010	Amber	Amber	Green	Green	Green	Amber	Green	Amber	Amber	Red	Amber	Green	Amber	Green
GNLP4049	Amber	Green	Amber	Green	Green	Amber	Green	Amber	Amber	Green	Amber	Green	Amber	Green

## **STAGE 3 – SUMMARY OF COMMENTS FROM THE REGULATION 18 STAGE C CONSULTATION**

See Part 2 above.

## **STAGE 4 – DISCUSSION OF NEW & REVISED SITES**

**In this section sites are assessed in order to establish whether they are suitable for allocation. For the purposes of Sustainability Appraisal, suitable sites are those which are considered to be Reasonable Alternatives. Sites not considered suitable for allocation are not realistic options and therefore are not considered to be reasonable alternatives. The discussion below outlines the reasons why a site has been deemed suitable or unsuitable for allocation. By association this is also the outline of the reasons why a site was deemed to be a reasonable or unreasonable alternative.**

**A range of factors have been taken into account to establish whether a site should, or should not, be considered suitable for allocation. These factors include: impact on heritage and landscape; impact on the form and character of the settlement; relationship to services and facilities; environmental concerns, including flood risk; and, in particular, a safe walking route to a primary school. Sites which do not have a safe walking route to school, or where a safe walking route cannot be created will not be considered suitable for allocation.**

**Conclusions in regard to a sites performance against the relevant factors have also been informed by the outcomes of the HELAA, consultation responses received and other relevant evidence.**

### **Diss**

#### **Land north of Frenze Hall Lane and West of Walcot Green, GNLP1044R, 10.29 ha, Housing**

At a strategic level GNLP1044R is suitable to accommodate some development as it is at the built edge of Diss. A range of services and facilities are within an accessible distance by walking, including Diss Infant School at a distance of 1.3 km. There are constraints to the site, most notably how an acceptable highways solution could be reached and local highway authority comments will be needed. There is too the matter of what scale of growth is appropriate to Diss. Currently, this is set at 400 homes on new allocations, as described in the GNLP Draft Strategy consulted upon in January 2020. It is important to note though that site allocations are likely to be made by the Diss and District Neighbourhood Plan. So whilst recognising the context to planning policy options in Diss, the principle of development is not ruled out, and GNLP1044R is considered a reasonable alternative.

### **Tottington Lane, GNLP4010, 1.07 ha, 10+ dwellings**

This site is towards the edge of what could be considered as an accessible walking distance to services and facilities. There are constraints to GNLP4010 that include the highways network, the overlapping boundary with Roydon Fen County Wildlife Site, proximity to other ecologically designated sites like Wortham Ling SSSI, and the nearby listed building assets. Despite these significant matters, the principle of development cannot be ruled out without further comments from internal consultees so further assessment is justified, and GNLP4010 is considered a reasonable alternative.

### **South of Burston Road, GNLP4049, 20.49 ha, Housing (and school on rep not form)**

At a strategic level GNLP4049 is suitable to accommodate some development as it is at the built edge of Diss. A range of services and facilities are within an accessible distance by walking, and Diss High School is immediately to the south of GNLP4049. There are though constraints to do with the highways network, as well as townscape and landscape considerations and comments will be needed from internal consultees. There is too the matter of what scale of growth is appropriate to Diss. Currently, this is set at 400 homes on new allocations, as described in the GNLP Draft Strategy consulted upon in January 2020. It is important to note though that site allocations are likely to be made by the Diss and District Neighbourhood Plan. So whilst recognising the context to planning policy options in Diss, the principle of development is not ruled out, and GNLP4049 is considered a reasonable alternative.

## STAGE 5 – SHORTLIST OF REASONABLE ALTERNATIVE NEW & REVISED SITES FOR FURTHER ASSESSMENT

Based on the assessment undertaken at stage 4 above the following sites are considered to be reasonable alternatives.

<b>Address</b>	<b>Site Reference</b>	<b>Area (ha)</b>	<b>Proposal</b>
<b>Diss</b>			
Land north of Frenze Hall Lane and West of Walcot Green	GNLP1044R	10.29	Housing
Tottington Lane	GNLP4010	1.07	10+ dwellings
South of Burston Road	GNLP4049	20.49	Housing (and school on rep not form)
<b>TOTAL</b>		<b>31.85</b>	

**STAGE 6 – DETAILED SITE ASSESSMENTS OF REASONABLE ALTERNATIVE  
NEW & REVISED SITES**

<b>Site Reference:</b>	GNLP1044R
<b>Address:</b>	Land north of Frenze Hall Lane and West of Walcot Green, Diss
<b>Proposal:</b>	Housing (120 dwellings)

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Agricultural	Greenfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA:</b>
<p><b>Amber Constraints in HELAA</b> Site access, Utilities Capacity, Utilities Infrastructure, Flood Risk, Significant landscapes, Sensitive townscapes, Biodiversity &amp; Geodiversity, Historic environment, Transport &amp; Roads, Compatibility with neighbouring uses</p>
<p><b>HELAA Conclusion:</b> This a 10.29 ha greenfield site between Diss and Walcot Green, for which the scale of development has been revised down from 200-300 homes to 120 homes. Vehicular access would likely be from Walcot Green and Frenze Hall Lane. Initial highways evidence indicates concern over the network north and west of the site but that discussions are taking place with a neighbouring developer to enable an off-carriageway pedestrian route along Walcott Green. The site is at the edge of Diss, so has potential to be accessible to employment opportunities, schools, shops and the railway station. For example, Diss Infant School is a distance of 1.3 km, and Diss High School 1.7 km. Part of the site is adjacent to the railway line, and so some noise mitigation may be necessary. The site could impact on some listed buildings in Walcot Green, and a Grade I-listed church in nearby Frenze. Some mitigation of potential ecological impacts on Frenze Hall County Wildlife Site may be necessary. Small parts of the site alongside the railway line, that are vulnerable to surface water flooding, at 1 in 30 and 1 in 100 risk. Based on the revised proposal, and further advice from the Highways Authority, the site is considered suitable. However, as the site has already been assessed for the purposes of the HELAA it will not contribute any additional capacity without double-counting and has therefore been marked unsuitable.</p>

**FURTHER COMMENTS:**

Site reduced to 120 dwellings and requires detailed assessment.

**Highways**

Network below required standard to support development traffic, particularly north & west of site. Widening to a minimum of 5.5m required at Walcott Green with 2.0m wide footways t both sides of Walcott Green for full site frontage. Step free pedestrian connection required between east and west site areas. Potential constraint at Walcott Green junction with Frenze Hall Road. Potential to consider with 0599 & 4049 if 6.0m (min width) link road could be introduced between Walcott Green & Heywood Road. Local highway requirements would also be required at Walcot Rd to include c/w widening & footways.

**Lead Local Flood Authority**

Standard information required at a planning stage.

**Development Management**

Lane to the east Walcot Green is severely constrained. Issues with capacity and drainage under bridge.

**PLANNING HISTORY:**

Not applicable

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION:**

Lane to the east Walcot Green is severely constrained. Issues with capacity and drainage under bridge

<b>Site Reference:</b>	GNLP4010
<b>Address:</b>	Tottington Lane, Diss
<b>Proposal:</b>	10+ dwellings

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Countryside, part bordering a County Wildlife Site	Greenfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA:</b>
<p><b>Amber Constraints in HELAA</b>  Site access, Access to services, Flood Risk, Significant landscapes, Sensitive townscapes, Biodiversity &amp; Geodiversity (Red), Historic environment, Transport &amp; Roads,</p>
<p><b>HELAA Conclusion:</b>  This is a 1.07 ha site off Tottington Lane and Potash Lane that is promoted for a minimum of 10 homes. Although the site benefits from an edge of Diss location, the distance to services and facilities is generally at least a kilometre, and footpath connections along Tottington Lane are incomplete. Initial highways evidence raises concern over the network and the site's remoteness for pedestrians. A significant constraint of the site is the proximity of Roydon Fen County Wildlife Site, which the western boundary of GNLP4010 appears to encroach upon. The site is also within the 1 km impact zone of Wortham Ling SSSI. The distance of less than 40 metres from the Grade II Listed cottage 'By the Potash' is another factor. However, there are no known constraints from flood risk, utilities infrastructure, contamination or ground instability. Although the site has some constraints, it is considered suitable for the land availability assessment.</p>

<b>FURTHER COMMENTS:</b>
<p><b>Highways</b>  No further comment</p> <p><b>Lead Local Flood Authority</b>  Standard information required at a planning stage.</p> <p><b>Development Management</b>  No further comment</p>



<b>PLANNING HISTORY:</b>
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Not applicable
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<b>BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION:</b>
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Submission form and site plan
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<b>Site Reference:</b>	GNLP4049
<b>Address:</b>	South of Burston Road, Diss
<b>Proposal:</b>	Housing (and school on rep not form)

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Agricultural	Greenfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA:</b>
<p><b>Amber Constraints in HELAA</b>  Site access, Utilities Capacity, Flood Risk, Significant landscapes, Sensitive townscapes, Historic environment, Transport &amp; Roads</p>
<p><b>HELAA Conclusion:</b>  This a 20.49 ha greenfield site east of Heywood Road, south of Burston Road, and north of Walcot Road. The site is promoted for housing with land for education provision and a country park. Initial highways evidence raises concern about the network west and south, but suggests development potential could exist if considered with other sites.  The site lies within an accessible distance of services, including employment opportunities, schools, shops and the railway station. For example Diss High School is immediately to the south. The site could impact on some listed buildings in Walcot Green, but these considerations are thought mitigatable. There are no significant areas of flood risk on the site, except for some parts at surface water flood risk (for which an attenuation basin is proposed). Due to the size of the site, there are likely to be townscape and landscape considerations. To facilitate development sewerage upgrades would likely be required, but there are no known constraints from contamination or ground instability, potential loss of open space, or ecological designations. In conclusion, the site is considered as suitable for the land availability assessment.</p>

<b>FURTHER COMMENTS:</b>
<p><b>Highways</b>  Network below required standard to support development traffic.</p> <p><b>Lead Local Flood Authority</b>  The site is affected by a minor extension of a flow path.</p>

**Development Management**

Concern about setting of Walcot Green hamlet.

**PLANNING HISTORY:**

Not applicable

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION:**

Site submission form, promotional representation, site plan

## STAGE 7 – INITIAL CONCLUSIONS ON THE SUITABILITY OF NEW AND REVISED SITES FOR ALLOCATION

The new and revised sites shortlisted at Stage 4 have been subject to further consideration with Development Management, the Local Highway Authority and Lead Local Flood Authority and their comments are recorded under Stage 6 above. Based on their views the following initial conclusions regarding the suitability of the sites for allocation have been drawn.

### New and revised sites to be considered for allocation:

None

### New and revised sites considered to be unreasonable for allocation:

Address	Site Reference	Area (ha)	Promoted for	Reason for rejection
<b>Diss (including part of Roydon)</b>				
Land north of Frenze Hall Lane and west of Walcott Green, Diss	GMLP1044	10.95	Residential (unspecified number)	Site not allocated. Decisions over carried forward and new allocations are deferred to the neighbourhood plan process.
	GMLP1044R	10.29	Housing	
Tottington Lane	GMLP4010	1.07	10+ dwellings	Site not allocated. Decisions over carried forward and new allocations are deferred to the neighbourhood plan process.
South of Burston Road	GMLP4049	20.49	Housing (and school on rep not form)	Site not allocated. Decisions over carried forward and new allocations are deferred to the neighbourhood plan process.

## **FINAL CONCLUSIONS FOR THE REGULATION 19 VERSION OF THE PLAN**

### **Site assessments prior to the Regulation 18C consultation**

Up to the Regulation 18C consultation in January 2020 there were nine sites measuring 32.79 hectares in Diss, equalling to the potential for approximately 825 homes. The outcome of initial site assessment work (which is detailed in part 1 of this booklet) was to prefer GNLP0102 for 200 homes and the combined GNLP0250/0342/0119/0291 again for 200 homes.

This matched the then strategic requirement for approximately 400 dwellings in Diss, as defined in the Part 1 Strategy consulted upon in January 2020. GNLP0102 was favoured partly for its sustainable location. Crucially though the current owners and operators (Frontier Agriculture) are looking to relocate in the long-term, and this will create a brownfield redevelopment opportunity.

Of the various greenfield development options, the combined GNLP0250/0342/0119/0291 was preferred. Development here would be well related to the Town and would enable a new link road. Connecting Heywood Road and Shelfanger Road may alleviate some existing traffic problems in Diss.

### **Summary of comments from the Regulation 18C draft plan consultation**

Through the Regulation 18C consultation comments were received about the preferred sites. Some opposed the principle of development, while other comments focused on matters to do with highways, townscape, landscape, and impact on local facilities. Others spoke about site details. Such as the density of development appropriate for GNLP0102; or, the obligation for new cemetery land as part of GNLP0250/0342/0119/0291.

Planning for no new development in Diss is not considered an option for the GNLP. Nevertheless, scope exists to configure the site choices to the preferences of consultees and the evidence provided. That extends to policy details so that development comes forward in the best possible way.

With the Regulation 18C consultation two reasonable alternatives were put forward. The first was GNLP0341, locally known as Parish Fields, and it received over 40 objections. Objections about GNLP0341 focused mostly on the land's townscape, heritage, and ecological values.

A second reasonable alternative in the Regulation 18C consultation was GNLP1045 for residential use. In the site's favour is its location near the town centre and railway station, and within the existing settlement boundary, but against it is the current DIS 8 allocation as employment land. GNLP1045 received six comments, split evenly between support, object, and general comment.

As to the other eight sites consulted upon, most respondents supported the assessment of 'unreasonable' and that the sites should not be included in the GNLP. Most respondents focused on harms, such as loss of greenified land, landscape and townscape impacts, infrastructure constraints like the road network, coalescence with Roydon to the west, and coalescence with Walcot Green to the north. In the majority of instances support for the eight unreasonable sites only came from their respective promoters.

### **Assessment of new and revised sites submitted through the Regulation 18C consultation**

Two new sites and one revised site was submitted during the consultation between January and March 2020.

GNLP4010 is to the south-west, located off Tottington Lane, and measures 1.07 ha. Whilst less than optimal the site is considered a reasonable alternative. Despite concerns about its proximity to Roydon Fen County Wildlife Site, highways access, and walking distances to local facilities.

The second new site is GNLP4049, which measures 20.49 ha, and is located immediately north near Diss High School, between Burston Road and Walcot Road. A large-scale site of this nature poses challenges in terms of highways, townscape, and landscape. This land also helps define a gap between Diss and Walcot Green but GNLP4049 was assessed as a reasonable alternative.

The one revised site GNLP1044R on land between Diss and Walcot Green changed the proposed scheme down from 200-300 homes to 120 homes. The reduction in scale (plus the supporting information from the promoter) provided some confidence that solutions may exist to address concerns about the site. All previous constraints remain, but the scheme proposed is sufficiently different as to merit a new appraisal.

### **Sustainability Appraisal**

The sustainability performance of each reasonable alternative site has been considered in the selection of sites. The Sustainability Appraisal includes a scoring and assessment narrative on the sustainability performance of each reasonable alternative and recommendations for mitigation measures which have been incorporated in policy requirements as appropriate. The Sustainability Appraisal (which can be found in the evidence base [here](#)) highlighted a number of negative and positive impacts for the sites in Diss.

Including existing for reallocation, a total of 22 sites were considered. The range in sites is significant. The largest measured 50 ha, whilst a few measured less than 1 ha, as well as varying from urban brownfield sites to large greenfield sites. Consequently, the sustainability appraisal post mitigation scores vary. Out of 15 criteria, sites scored between 3 and 8 'reds', between 1 and 6 'neutrals', and between 4 and 7 'greens'.

Notable was one major negative 'red' for GNLP2104 in respect to the climate change mitigation & adaptation due to flood risk – although it is observed that this is a large greenfield site. As to major positive scores, nine sites scored at least 1, and 4 sites

scored 2 major positive scores – for criteria of ‘Housing’, ‘Population and Communities’, ‘Education’, ‘Economy’, ‘Transport and Access to Services’.

Issues flagged up by the sustainability appraisal have informed and assisted in corroborating the site selection process. Helping to establish a preferential order for selecting sites and informing the identification of policy requirements. Leading to a process for selecting the optimal sites for allocation. Work that will complement similar appraisals undertaken in parallel for the Diss & District Neighbourhood Plan.

### **Final conclusion on sites for allocation in the Regulation 19 Plan**

The consultation feedback received during 2020 has given confidence to the deliverability of new residential development in Diss. The strategic requirement for new housing, as defined in the Part 1 Draft Strategy, thus remains for at least 400 new homes. However, an important judgement exists in the process for how sites are allocated. The choice being between the GNLP or the Neighbourhood Plan.

A priority going forward is allowing opportunity for the neighbourhood tier of plan-making to take the lead. This is an easy choice for Diss because the Neighbourhood Plan is making good progress and is following a similar timeline to the GNLP. Site allocations are thus devolved to the Neighbourhood with the exception of Frontier Agriculture (GNLP0102).

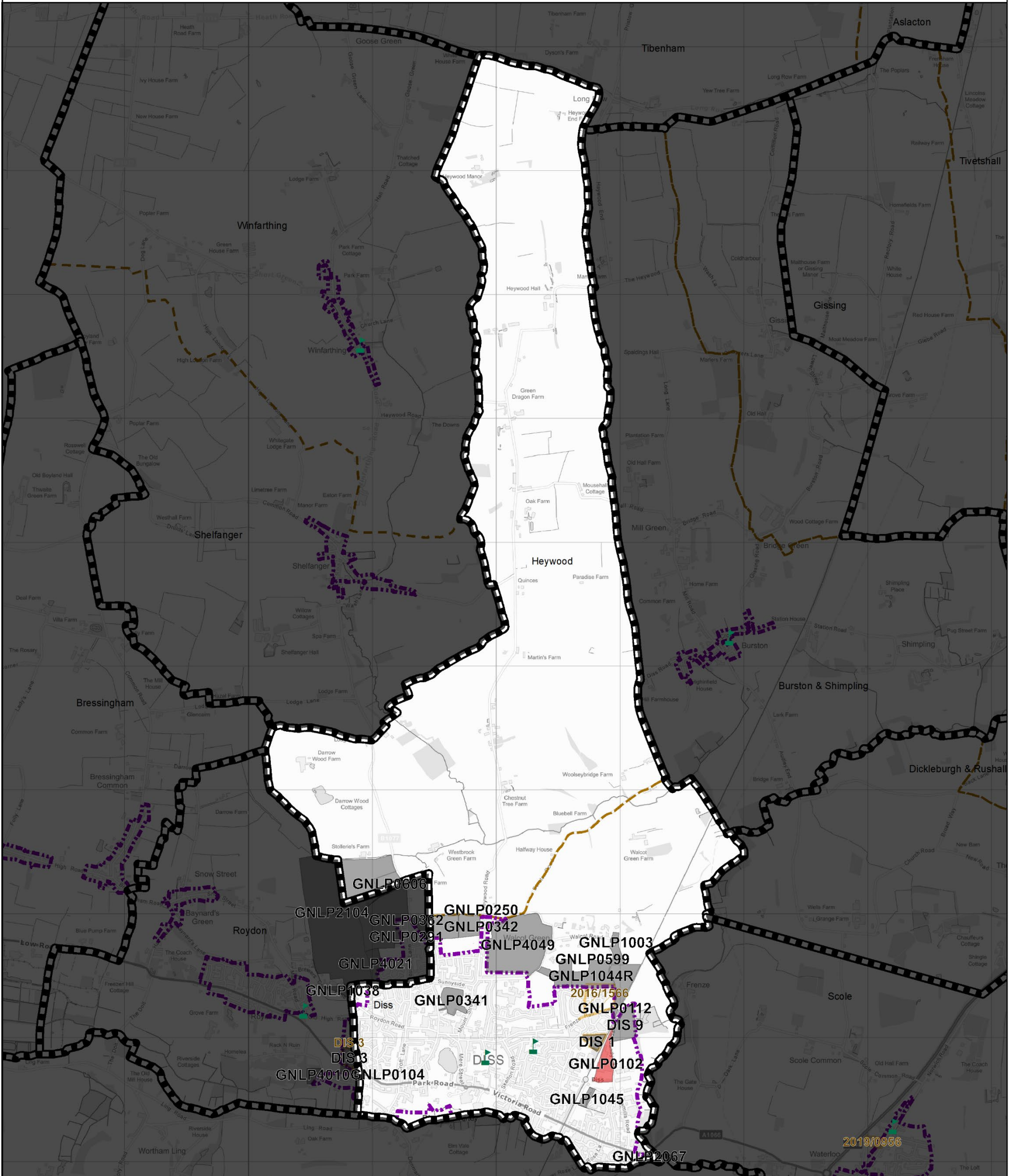
GNLP0102, which was the preferred site option, is now an allocation. Under national planning policy guidance its redevelopment would be automatic in order to make effective use of land, due to its brownfield status and highly sustainable location next to the railway. On this basis GNLP0102 should be included in the GNLP rather than deferred to the neighbourhood planning process.

Except for GNLP0102, the selection of new sites and reallocation of existing sites are matters for Diss & District Neighbourhood Plan.

See tables of allocated and unallocated sites at appendices A and B for a full list of sites promoted with reasons for allocation or rejection.

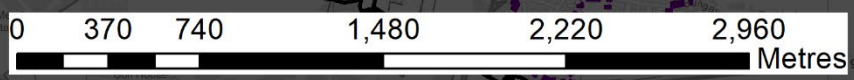
# DISS








## GREATER NORWICH LOCAL PLAN PROMOTED SITES BY SCHOOL CATCHMENT AREAS



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-  Primary School
-  Housing Allocation
-  Commitment\*
-  Primary School Catchment (2018-19)
-  Not Allocated
-  Parish Boundary
-  Settlement Boundary

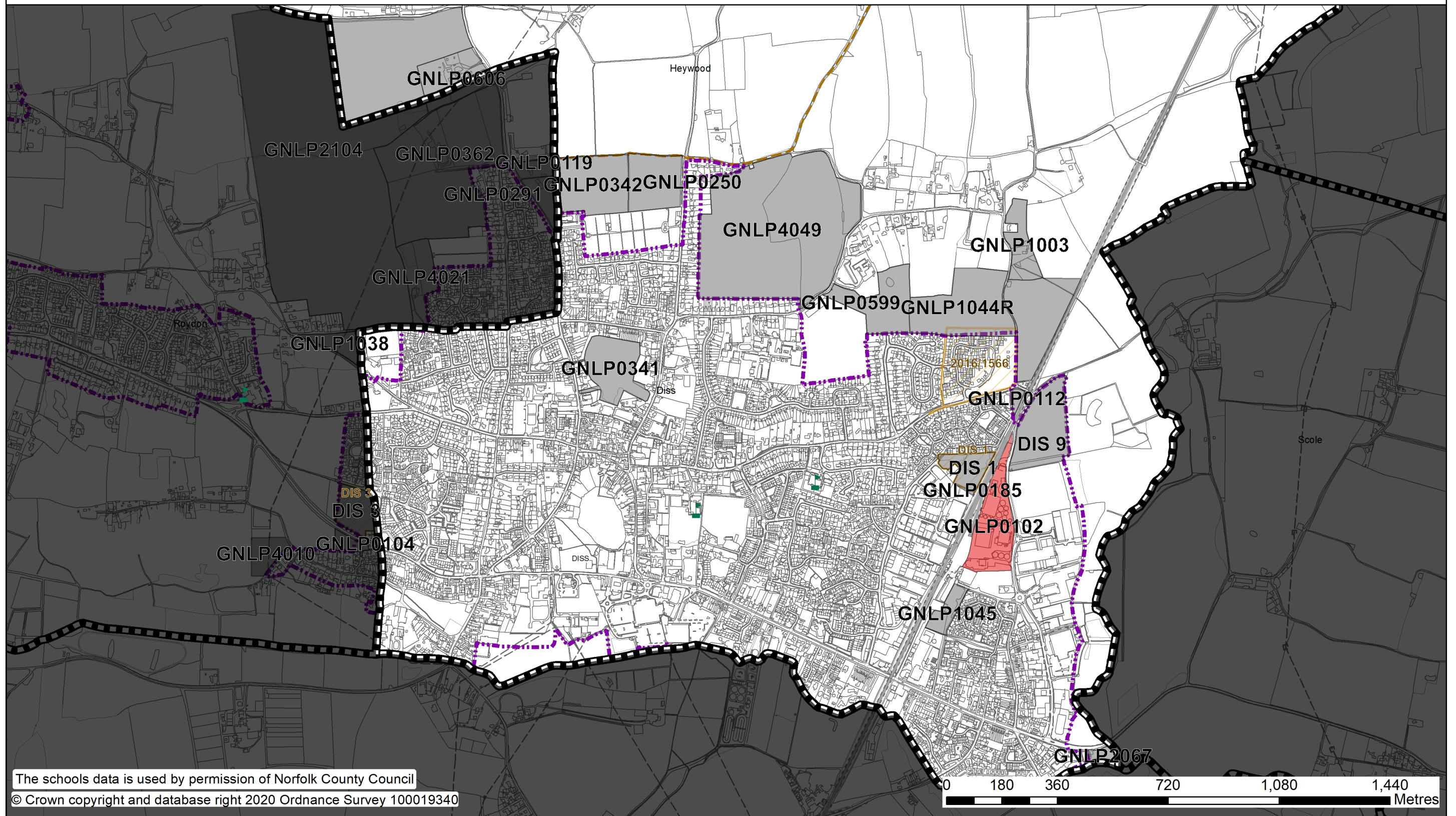


1:28,500  
at A3

Date: 25/11/2020

\*new and extant permissions at 1st April 2020 (10 or more dwellings)





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	Primary School		Housing Allocation		Settlement Boundary		Parish Boundary
	Primary School Catchment (2018-19)		Not Allocated		Commitment*		

\*new and extant permissions at 1st April 2020 (10 or more dwellings)

N  
1:11,450  
at A3  
Date: 25/11/2020