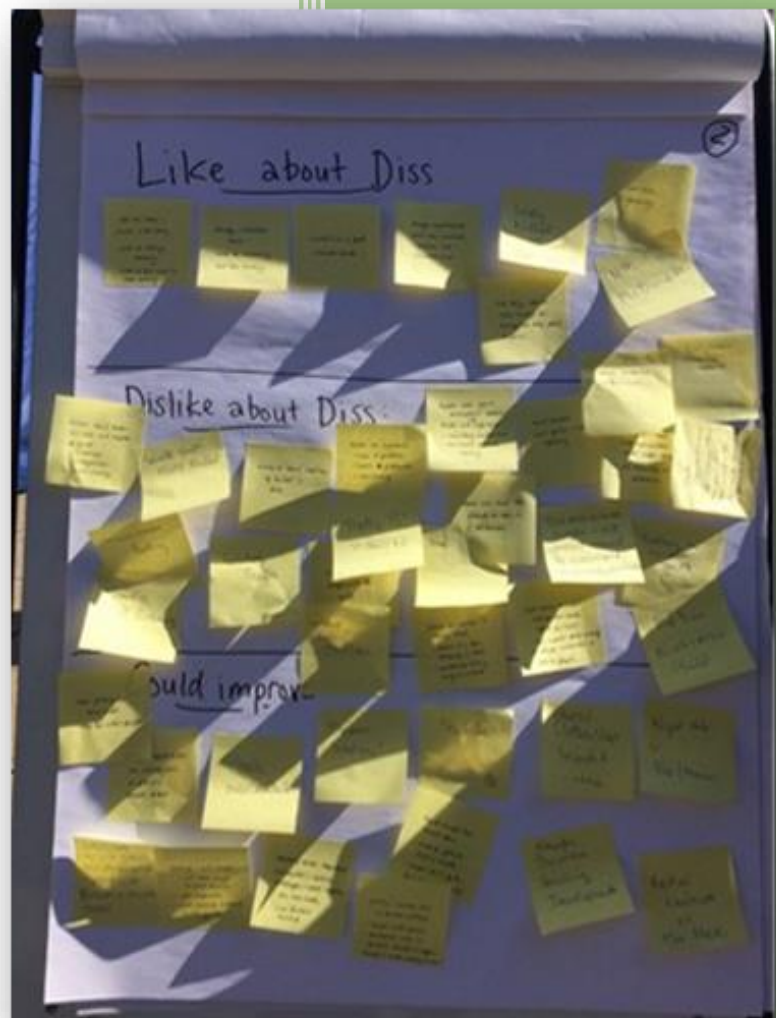


June
2022

DDNP Consultation Statement



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Forward

The Diss and District Neighbourhood Plan is one of the most complex undertaken in the UK, spanning two local authority areas and including seven parishes – one of which is a market town.

Consultation was also a challenge, given that there were two Issues and Options Consultations and two Regulation 14 consultations undertaken, as well as the need to assess 77 sites across the neighbourhood plan area. Views, Non-Designated heritage assets and Local Green Spaces also required extensive communication and consultation with owners, agents and the local communities.

This consultation statement starts with an overview of the work undertaken to consult with the local communities and stakeholders. It concludes with an itemised list of the views and comments received back from all consultees, and what decisions / amends were made as a result.

Section 1 ‘Summary of early engagement outlines the early consultation work undertaken from the Plan’s inception in 2017, through its first consultation survey undertaken in spring 2018. It outlines the general approach taken to consulting and engaging with the communities to define the vision and themes and actions taken in 2019 to keep the momentum going with a new online presence.

This section closes with a look at what was planned for Summer 2020 in preparation for the planned Issues and Options consultations.

Section 2 ‘Issues and Options Consultations’ focusses specifically on the two main Issues and Options consultations undertaken during the summer of 2020. We outline the steps we took to promote the consultations, how the results were shared and how they informed the developing Plan.

It also covers the impact of Covid-19 on a planned summer of activities to promote the Plan and boost engagement in readiness for these consultations.

Section 3: Regulation 14 Consultations again demonstrates actions taken to enable people to get involved and to share their comments in the two Regulation 14 consultations we were obliged to undertake. It also lists the specific agencies who were consulted and gives a flavour of the feedback received. This section includes commentary on how this was reviewed and, where appropriate, incorporated in the final Submission Version of the DDNP that this Consultation Statement accompanies.

Links have been included to our website, www.ddnp.info to show key pages/information/links to documents to save reproducing information here, although the appendix does include screen shots and graphic images.

DDNP Steering Group June 2022

Introduction

Overview of Diss & District Neighbourhood Plan

The Diss & District Neighbourhood Plan (DDNP) has been prepared in accordance with the Town & Country Planning Act 1990, the Planning & Compulsory Purchase Act 2004, the Localism Act 2011, the Neighbourhood Planning (General) Regulations 2012 and the Directive 2001/42/EC on Strategic Environmental Assessment.

It establishes a vision and objectives for the future of the parish and sets out how this will be realised through non-strategic planning policies.

About this consultation statement

This consultation statement has been prepared by Collective Community Planning on behalf of the DDNP Steering Group to fulfil the legal obligation of the Neighbourhood Planning Regulations 2012. Section a5(2) of the Regulations sets out that a Consultation Statement should contain

- a) Details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- b) Explains how they were consulted;
- c) Summarises the main issues and concerns raised by the persons consulted; and
- d) Describes how these issues and concerns have been considered and where relevant addressed in the proposed neighbourhood development plan.

It has also been prepared to demonstrate that the process has complied with Section 14 of the Neighbourhood Planning (General) Regulations 2012. This sets out that before submitting a plan proposal to the local planning authority, a qualifying body must:

- a) Publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the Neighbourhood Plan area:
 - i. Details of the proposals for a neighbourhood development plan
 - ii. Details of where and when the proposals for a neighbourhood development plan may be inspected;
 - iii. Details of how to make representations; and
 - iv. The date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;
- b) Consult any consultation body referred to in paragraph 1 of Schedule 1 whose interest the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and
- c) Send a copy of the proposals for a neighbourhood development plan to the local planning authority.

Furthermore, the National Planning Practice Guidance requires that the qualifying body should be inclusive and open in the preparation of its Neighbourhood Plan, and ensure that the wider community:

- Is kept fully informed of what is being proposed;
- Is able to make their views known throughout the process;
- Has opportunities to be actively involved in shaping the emerging Neighbourhood Plan; and
- Is made aware of how their views have informed the draft Neighbourhood Plan.

This statement provides an overview and description of the consultation that was undertaken by the Diss & District Steering Group (the DDNPSG) in developing their Neighbourhood Plan, in particular the Regulation 14 consultations on the pre-submission draft. The steering group have endeavoured to ensure that the Neighbourhood Plan reflects the views and wishes of the local community and the key stakeholders which were engaged with from the very start of its development.

Section 1: Summary of early engagement

Diss Town Council, as the lead body, submitted a Neighbourhood Area application to South Norfolk and Babergh Mid Suffolk District Councils to define the boundary of the Diss and District Neighbourhood Plan area on 2nd June 2017.

In addition to Diss Town Council, six parish councils surrounding Diss are within the boundary, namely Roydon, Burston and Shimpling, Scole, Brome and Oakley, Stuston and Palgrave.

The area is distinctive because it straddles two counties – Norfolk and Suffolk – and two local authority areas – South Norfolk and Babergh Mid Suffolk.

The publication period ran from 16th June to 31st July 2017. Under the Neighbourhood Planning (General) Regulations 2012 (as amended), both local authorities confirmed the designated NDP Area on 23rd August 2017.

The parishes have since been meeting together monthly since summer 2016, and have taken time to determine governance, giving all surrounding parishes an opportunity to be included or not, and consulted with their individual communities to see their approval for proceeding with the Plan as proposed.

What approach would work best?

Prior to starting consulting in any capacity with people living in the areas included in the newly designated DDNP area, it was clear the steering group, comprising 16 representatives operating independently and as a group, needed to meet the challenges of ensuring the DDNP stayed ‘on message’ by having a centralized approach to community engagement whilst still maintaining local, more reactive messaging at parish level.

Whilst no formal communications and engagement strategy was specifically drawn up for the DDNP, the steering group was aware of the need to:

- Engage effectively with the local community using the best ways available to them
- Not to be too prescriptive in seeking people’s views because it wanted the community to define the key issues; the steering group thought it knew what they were, but wanted confirmation
- Ensure there were sufficient resources in place (both people and IT) to deliver a robust approach to consultation and engagement within a project likely to take several years to deliver.

From the outset, the steering group ensured the DDNP was a standing item on parish meetings.

Minutes were published on local parish websites, many of which have dedicated ‘neighbourhood plan’ pages on their site.

Steering group representatives made themselves known as such, and each had a profile on our dedicated page on the DDNP website, with contact details.

<https://www.ddnp.info/who-we-are>

Early consultation



Figure 1 Early engagement was undertaken to raise awareness of the DDNP and what it is and, second to ask people what they liked and disliked about Diss and the surrounding area.

Compact and busy market towns, with their traditional ‘High Street’ layouts such as Diss offer plenty of opportunity to promote awareness and engagement of the Plan.

A weekly market was utilised as the ideal opportunity to engage face to face with local people, and their feedback helped shape the early vision and aims of the Plan, as shown in the photograph here.

Once the initial engagement work of introducing the concept of the DDNP to the local population and gathering ‘like/dislike’ style feedback to roughly ascertain issues and opportunities, the first of what would be three public consultation exercises got underway in Spring 2018.

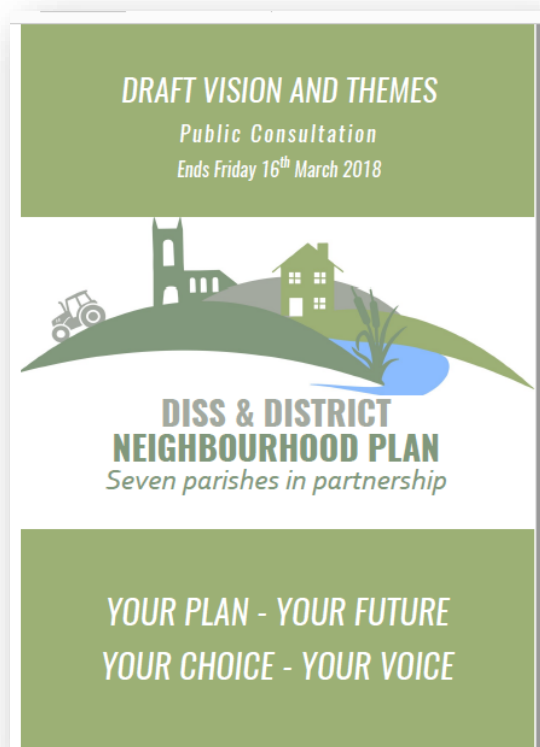
Developing the DDNP's Vision and Aims

The DDNP sets out a vision statement to create a 'vibrant community around a thriving market town', together with 10 aims to achieve this. These covered sustainable growth, design and character, growth and infrastructure, ecology and habitat, transport and traffic, sports and leisure, digital connectivity, Diss town centre, community character and local climate change issues.

These aims were developed following consultation early on with the local community, and have been promoted across a variety of platforms during the development of the Plan.

Spring 2018: Consulting on the DDNP's draft Vision and Themes

Figure 2 Early consultation got underway to identify themes and agree a vision statement for the plan that had been arrived at through consulting with the local community



'Your Plan – Your Future – Your Choice – Your Voice'

A 20 page professionally page booklet was circulated to every household in the NDP area early 2018. Its aim was to introduce the Plan to a wider audience, and to outline what the initial 'market days' public consultation had revealed about what the concerns and issues were. [View the booklet here](#)

From that a simple vision statement had been arrived at, and the challenges the Plan could address were outlined in the form of themes.

'A vibrant community centred around a thriving market town'

DDNP Mission statement

The vision and themes would set out the future direction of the DDNP and form the structure for the policies that will influence future growth for the area.

Its second aim was to invite people to complete a survey, included in the booklet, to indicate if they believed the steering group was on the right track with regard to the themes that early consultation had revealed.

Over 800 people took part in the survey (which was conducted in the tradition print medium as well as online. www.ddnp.info/documents/findings¹

[The summary report is included in full in the Appendix A](#)

Early engagement – summary of the main issues raised

The table below shows the themes ranked in order of agreement with including them as such from those who took part in this initial consultation in 2018.

Rank	Theme	Agree	No Opinion	Disagree
1	Community, Leisure & Wellbeing	733 (93.50%)	35 (4.46%)	16 (2.04%)
2	Getting About	730 (93.11%)	30 (3.83%)	24 (3.06%)
3	Environment, Heritage & Landscape	712 (90.82%)	57 (7.27%)	15 (1.92%)
4	Shopping	706 (90.05%)	53 (6.76%)	25 (3.19%)
5	Digital Connectivity	689 (87.88%)	87 (11.10%)	8 (1.02%)
6	The Bigger Picture (what is happening in the surrounding areas)	680 (86.73%)	89 (11.35%)	15 (1.92%)
7	A Place to Live	679 (86.60%)	55 (7.02%)	50 (6.38%)
8	Sustain Local Identities	669 (85.34%)	94 (11.99%)	21 (2.68%)
9	Business & Employment	659 (84.06%)	110 (14.03%)	15 (1.91%)

¹ https://www.ddnp.info/_files/ugd/5020f3_c1bd4c094d2a4882b597778aaec4eeb5.pdf

Local Issues emerging from early consultation

This initial consultation also revealed local issues. Some of these were outside the scope of the DDNP, but were summarised in the consultation booklet.

These were included:

- Developing a plan for the land between The Mere and the River Waveney to include community uses for the benefit of the whole area
- Develop a sustainable long term use for the old Infant School site
- Agree acceptable development proposals to 'unlock the Parish Fields site for public access
- Reduce the amount traffic using the villages as a 'rat run' to avoid Diss
- Provide more safe routes for pedestrians and cyclists with integrated public transport links
- Ensure housing growth is sustainable and suits the needs of local people

2019: Gathering momentum

To keep the growing project on track, a new Chair was appointed, a project officer role was created to provide 20hrs a month support to the steering group, and local consultants 'Community Consultation Partnership' were appointed.

Having ascertained overall approval for the vision statement and themes, work then got underway to develop an [Evidence Base document](#), to apply for Locality funding and to start the process of draft an Issues and Options Report.

This work was all documented and reported in the minutes which were published on the original DDNP website. It was agreed however that this website had limited functionality, and the decision was taken to invest in a new professionally designed and DDA compliant website.

Going online www.ddnp.info

An all new professionally built website went live in March 2020. All the previous minutes were published, along with information gathered to date that was presented in a readable and easy to understand way.

This was supported by a dedicated Facebook page, which linked to a number of local community Facebook pages and reached a wider audience.

Summer 2020 – Community events

With the new website and facebook page in place, it was anticipated that the Summer 2020 would be the time to launch the Issues and Options consultations. This was a time where plenty of local events were being planned that the DDNP could 'piggyback' to useful effect.

Fetes and tea parties had been planned (some to celebrate the 76th anniversary of D Day) and the steering group were planning a 'gazebo and displays' presence at these (and as local parish councillors, they were often on the organising committee) to chat with local parishioners about the role the Plan could play in shaping future development in the local area, if any was earmarked, as well as protect and preserve the local character.

The Diss 2020 Carnival also offered a great opportunity to have an information stand where literally hundreds of people could find out more and takeaway information

Local schools were going to be invited to do a 'bag drop' of flyers that would go out to parents – and static displays were planned for parent/teacher evenings and school fetes.

Local volunteer working groups

An invitation to local residents to form 'working groups' to research, identify and photograph local heritage assets, views, green spaces and footpath networks had gone out and initial enquiries were being received.

Approaches had been made to local rambling groups, cycle clubs and individuals known to have expertise in certain areas that could 'cover the ground' quickly and ensure the DDNP reflected local concerns and aspirations.

And then, Covid 19 landed.

Boris Johnson's announcement of the first lockdown on Monday March 22nd coincided, literally, with the first meeting of our new working group.

The implications were clear for the group – it wasn't going to be possible to meet regularly, and much of the work would need to be done by individuals during lockdown.

Section 2: Issues and Options consultations

The previous section outlines the groundwork that had gone in to establishing the vision and themes, consulting on them, and improving the mechanisms available to communicate online. It also outlines the plans afoot for using community events during May and June 2020, which unfortunately Covid-19 rendered impossible to realise.

Despite having to shift gear quickly to being primarily online, the surveys went ahead as planned, with the emphasis being online.

The first 'Issues and Options' Consultation went live July 2020, and was promoted in the local press, online, via Facebook and the new [DDNP website](#).

It focused on three key areas

- Community assets worthy of protection in the Plan
- Walking and cycling network and improvements
- General questions to inform key policy areas

Respondents were asked to agree/disagree with a range of statements and whilst the survey was parish specific (in all, seven versions of master survey had to be created), people could complete a survey for any parish – so for example, an individual living in Roydon could complete a Roydon survey plus, if they so wished, a Diss survey.

Every chance was taken to keep it in the public awareness during the three weeks it was open, with display banners, flyers and postcards delivered to householders (reproduced below) inviting them to take part.

We also secured three interviews on Park Radio had good local coverage in the press.



The Diss & District Neighbourhood Plan

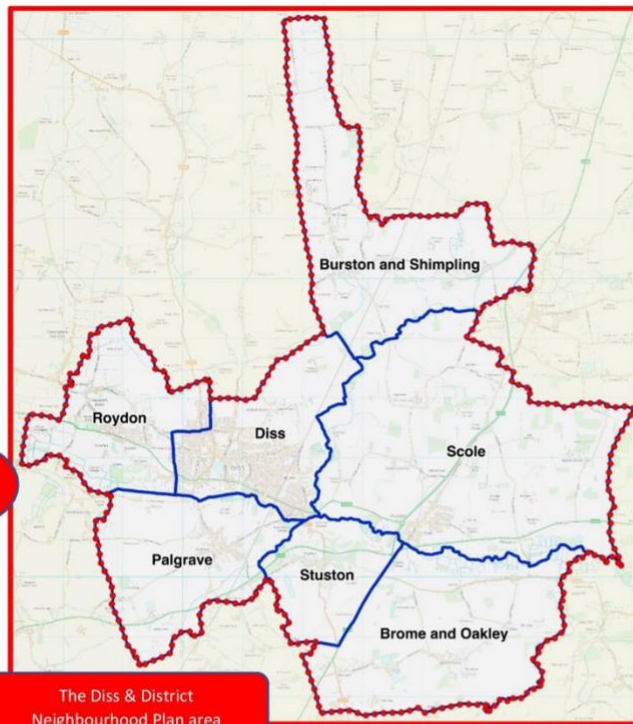
Your chance to shape the things to come in your area

Waveney valley Diss Burston
habitat protection walking corridors agricultural landscapes people and places
Shimpling Scole Palgrave environment
new homes development with sites design Green buildings market town regeneration
neighbourhood planning
Mid Suffolk views housing allocations
South Norfolk opportunities housing Stuston Brome
planning policy support needs neighbourhood gateways
heritage Roydon
housing need
community consultation

Have your say!

Visit www.ddnp.info

'Issues & Options' consultation
Community questionnaire



The Diss & District Neighbourhood Plan area

Dear Resident

The Diss & District Neighbourhood Plan involves seven parishes working in partnership across two local authority districts to shape how these parishes develop in terms of housing, the local environment, employment, facilities and local infrastructure.

As well as defining the housing development allocated for this area, this plan will include policies to protect and preserve **community assets** such as **local green spaces, pathways, cycleways, important views and heritage assets** that the local community have said are of special importance to them.

This plan is one of the most complex currently being undertaken in the UK and we need your help!

You can help with the development of the plan by taking part in a quick online questionnaire.



Visit the plan's website, www.ddnp.info to find out more - there's a link to the questionnaire on the homepage, or you can take a picture of the QR code below to complete it on your phone - or you can find us on Facebook and get the questionnaire from there. You can also enter a draw to win £20 shopping vouchers.

Printed copies of the questionnaire are available on request from your local parish council.

Your help with this work is vital, as neighbourhood plans are local planning documents shaped directly through community consultation, so please take part – what you tell us will help shape how these parishes develop in the future.

Thank you!

PS: It's an anonymous questionnaire so remember to include your contact details if you want to be included in the prize draw to win one of five £20 shopping vouchers!



However, engaging with communities in more rural hamlets and small villages, with no easily defined 'centre' where information could be displayed that would be seen by a high number of passers by provided its own challenges.

On a number of occasions where it was vital that people were made aware of, for example, the start of a survey, the steering group resorted here to hand delivering flyers through letterboxes and posting up information around key points in the villages.

Other parishes, notably those that were not going to have any development 'on their doorstep', encountered the perennial problem of trying to generate interest in a plan that wasn't seen as particularly important to the local residents.

However, the individual representatives have, over the last four years, remained committed to ensuring that the messaging was consistent, despite a sometimes disinterested audience, and that they were available and approachable to answer key questions.

At the final count, just under 1000 people took part in the survey, and the [results were shared on the website and at local parish level.](#)



Figure 3

Consulting during Covid

The promotion of the first survey was severely hampered by Covid 19 lockdowns, which also impacted on the ability to make printed copies available to pick up at various public locations in Diss and the villages.

It was acknowledged that whilst a return rate of around 13% couldn't render the results as being representative, the exercise had proved useful and informative in assessing support for a range of options.

In all, seven different reports were produced for this first survey, one for each parish, and made available to read, with printed copies available on request.

An example, for Roydon, is given here:

[Issues and Option Consultation Results Report for Roydon.](#)

Responding to what came out of the first Issues and Options Consultation

The screenshot shows a webpage titled "Issues & Options Consultation 2". At the top, there is a green banner for the "DDNP Issues & Options Survey" running from November 16th to December 7th. The banner includes a "Survey" button icon, a "do it online" link to www.ddnp.info, and a QR code. Below the banner, the text reads "Open to everyone living in Diss, Roydon, Palgrave, Scole, Brome & Oakley, Burston & Shimpling and Stuston". It also mentions "Have your say on new housing sites and local green spaces across the DDNP area" and "If you would like to receive a paper copy of the survey, please contact your local Parish Clerk".

LAUNCH THE SURVEY HERE

Following on from the earlier Issues & Options Consultation Survey which ran from July to August this year, ([read the results here](#)), the team behind the developing Diss & District Neighbourhood Plan need to consult again on a small number of newly suggested sites and local green spaces put forward by residents and landowners as part of that earlier consultation.

Each of these new sites has been independently assessed and we are now seeking your views on their inclusion in the Neighbourhood Plan. It is a much shorter survey than the first one, and should only take a few minutes to complete.

Consultation is an important part of developing the Neighbourhood Plan and all the feedback we receive from residents and businesses will be considered fully alongside other evidence, such as independent assessment, when determining which sites will be allocated.

[Go to the survey here](#) (completing it should only take a few minutes). Printed versions of the survey are available on request from your local parish clerk or by emailing ddnp@diss.gov.uk

The deadline to complete the survey is Monday December 7th, at 5pm.

Thank you for taking part, your input is very much appreciated. If you have any problems launching the survey, please email ddnp@diss.gov.uk.

DISS AND DISTRICT NEIGHBOURHOOD PLAN
416 Diss Town Council
11-12 Market Hill
Diss, Norfolk, IP22 4JZ
contact@ddnp.info

Website Accessibility Statement

As part of this initial issues and options consultation we asked people to put forward alternative sites for development. These sites were considered alongside others proactively put forward by landowners through the plan's development, and those submitted to the GNL and SNC as part of their call for sites, as part of the DDNP Site Options Assessment undertaken by AECOM. Also, some new local green spaces were put forward that needed to be consulted upon.

A second, follow consultation exercise got underway, and again, was hampered by winter lockdowns due to Covid 19.

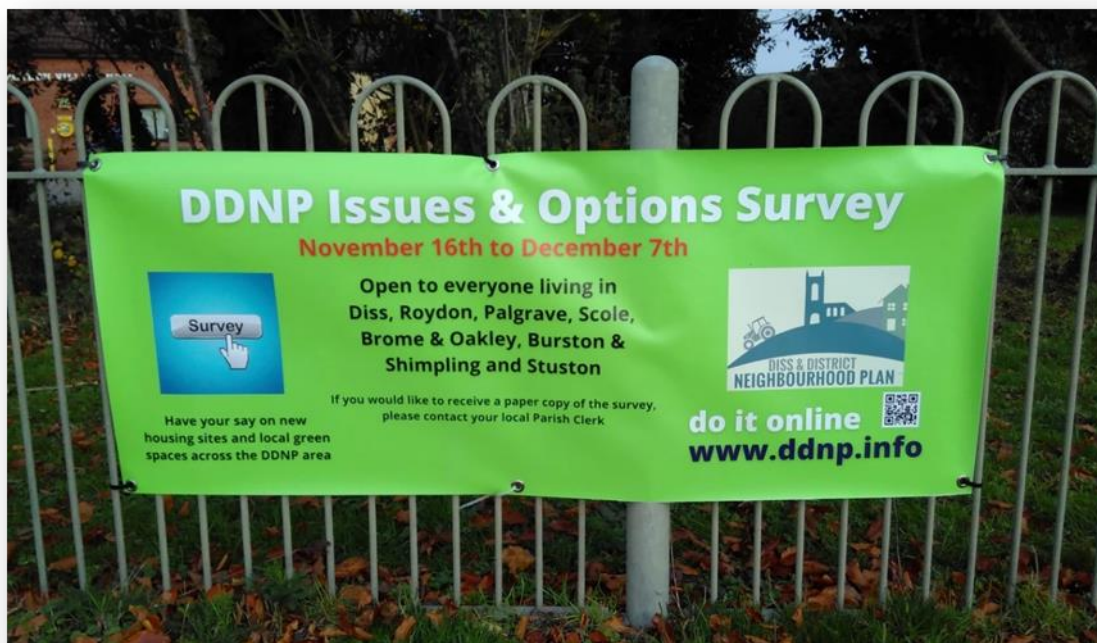
However, an online survey (again, with printed copies available on request) was launched, and was heavily promoted with banners, posters and fliers across the parishes.

There was the option to request delivery/collection of completed surveys, which was welcomed by many unable to go online.

[View the second consultation homepage here.](#)

Given this was a shorter survey, the results were collated into a single report, [available to view here.](#)

Just under 600 people took part.



Engaging Stakeholders

Communications with landowners and owners of non-designated heritage assets and local green spaces also started to get underway during this time. These were logged, and responded to as required by the appropriate steering group representative.

The new website proved invaluable in being able to provide timely information to stakeholders wanting to find out more.

What did we learn from these consultations?

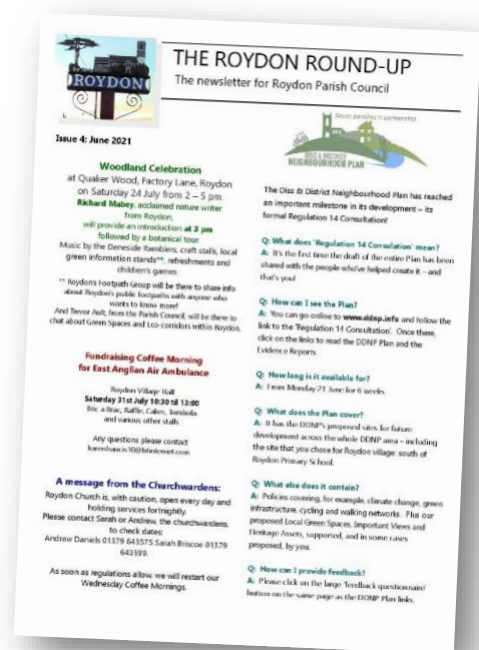
As well as learning the extent to which sites, community assets and proposals to regenerate Diss town centre were supported (or not) amongst those people taking part, it also became clear that there were other themes emerging around issues raised in the DDNP that needed to be focused on in subsequent communications.

Headline issues emerging from these two consultations were:

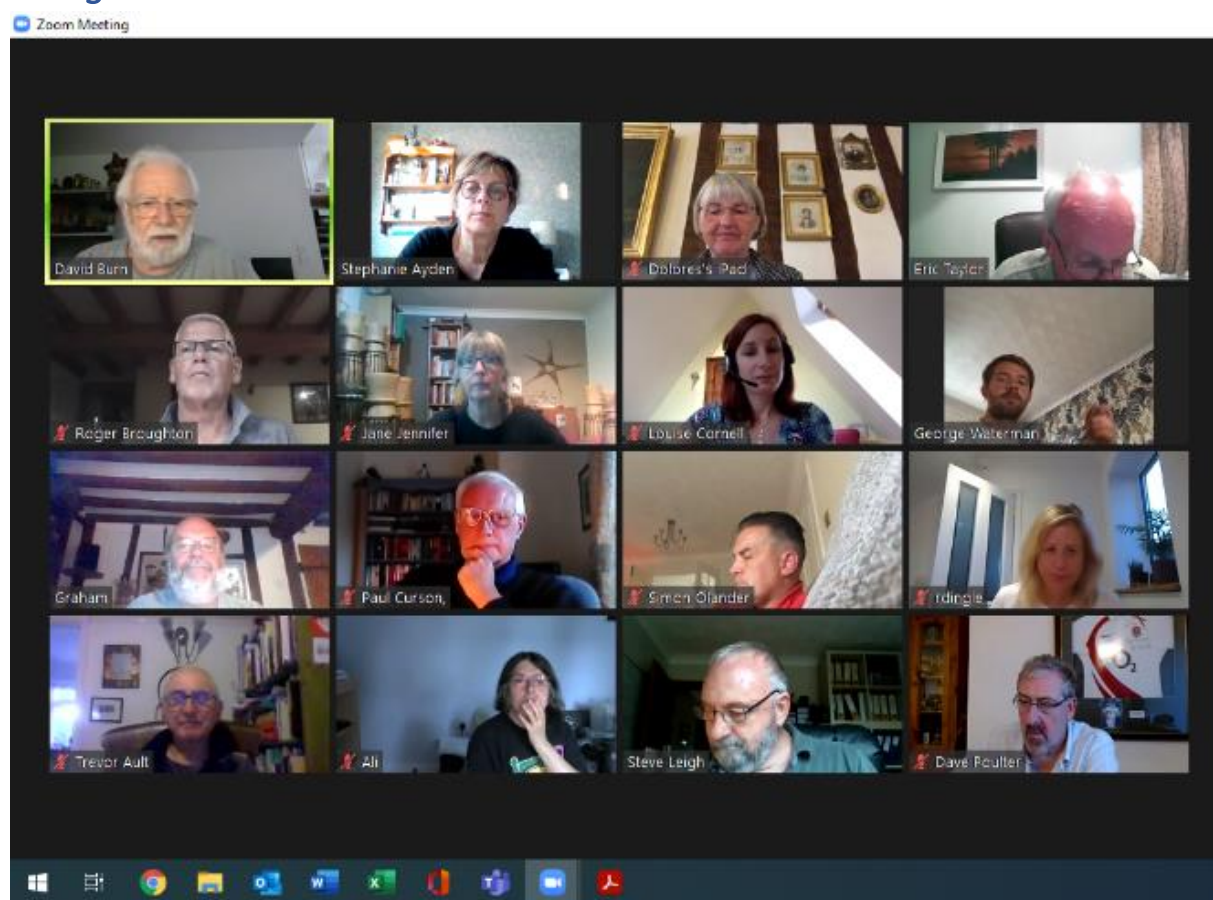
- The impact, locally, of climate change – specifically flooding
- The perceived erosion of the buffer between Roydon and Diss
- The loss/relocation of Diss Leisure Centre
- The loss of retail outlets in Diss town centre
- Traffic through Diss and rat running through villages

Whilst some of these issues, such as traffic, are not entirely within the remit of the DDNP, others were and we ensured they were addressed in the policies of the Plan, and in subsequent communication. Some of these areas of concern ran across all parishes, some were parish specific. Roydon parish in particular had a range of long-standing issues that needed to be handled sensitively.

The steering group representatives for Roydon established their own parish council Facebook page, and committed to a new hand delivered newsletter putting out factual information. The Roydon Roundup has proved a valuable tool in getting the message directly to people and the steering group representatives are to be congratulated on rising to the challenges of ensuring clear and correct messages can be delivered during a pandemic!



Using Zoom



We explored the options of hosting Zoom conferences for residents that could possibly match traditional Town Hall style communications, but these weren't considered viable. The steering group had been meeting online since April 2020, and the limitations of having productive meetings were apparent.

Inviting planning experts to contribute to steering group meetings

It was decided to address concerns, where we could, through inviting local authority representatives to our meetings, and sharing what they said via our minutes, which were also shared locally.

An example of this was to attempt to address the concern and misconceptions around the loss/relocation of the Diss Leisure centre. The Steering Group to invite Mr Mark Heazle, Leisure Business Development Manager from South Norfolk Council to share what the future may hold for this valued local asset, and his feedback was shared with the public in the [December 2020 Minutes](#).



The steering group also invited, Cllr Lisa Neal (SNC Cabinet Member for Stronger Economy/Development Control Committee Member), Cllr Graham Minshull (SNC Development Control Committee) Member and Phil Courtier (SNC Director of Place) to their April 2021 meeting, and again, this was reported back in the Minutes.

We also posted information on our website and Facebook page addressing issues. For example, we outlined the steps the DDNP was taking via its policies to address local issues, specifically flooding, brought about by climate change. [Read the article in full here.](#)

This article was covered in a number of local parish magazines, and feedback was positive.

Summary

This section has, hopefully, demonstrated the 'socially distanced' approach community consultation for our two issues and options consultation.

We've shown how comments were invited on the Issues and Options available, and despite having to conduct consultations mostly online, every effort was made to reach people who weren't online / preferred to receive printed materials.

Section 3: Regulation 14 Consultation (2021 and 2022)

The first Regulation 14 consultation ran for eight weeks, from 23rd June 2021 to 18th August 2021*. It consisted of an online survey, with printed copies available on request. Everyone who was consulted is listed in the table below. This meets the requirements of Paragraph 1 of Schedule 1 in Regulation 14.

An email was sent directly to each of the stakeholders, including statutory consultees, supplied by Babergh Mid Suffolk and South Norfolk Council, in addition to local stakeholders. This email informed the stakeholders of the commencement of the consultation period. These contacts involved numerous bodies and individuals that the Neighbourhood Plan steering group, South Norfolk Council and Babergh Mid Suffolk Council believed will be affected by the DDNP, such as neighbouring parishes, key bodies such as Historic England and Natural England. The email notified consultees of the DDNP's availability on the website, alongside supporting materials, and highlighted several ways to submit comments.

Throughout the consultation it was possible for people to make representation by

- Completing an online survey
- Filling in a hard copy of the survey or electronic version of the survey and sending this to the steering group
- Providing feedback via letter or electronically to the steering group.

**This was initially sent on 23rd June 2021 originally with a six week deadline date (August 4th 2021). However, it was subsequently advised by Babergh Mid Suffolk that an eight week consultation period would be preferred. The email was therefore resent, with the revised deadline date of August 18th 2021.*

The table below shows who was contacted, and by what method.



Who was consulted:

Who was consulted	Method
Residents in the DDNP area	<ul style="list-style-type: none"> • Double sided flier inserted in Summer 2021 Town Council Newsletter ‘Diss Matters’ for distribution to Diss and Roydon Residents. This flier was also displayed in community areas, local post offices, shops etc.(see above). • A drop in consultation event was held on the weekend of Friday July 2nd 2021, with Steering Group representatives available to explain the plan and answer questions. • A drop in event took place the following weekend at Roydon’s community centre. • The survey and information about the consultation was hand delivered to ‘hard to reach households • Banners were displayed in the market place in Diss and at other high visibility locations around the other parishes. • Hard copies of the plan, and the feedback forms, were available from Diss Town Council and all other parish councils. They could be delivered/collected on request. • All documents, including supporting evidence was available online • Posters in key locations around Diss and the villages, and consultation advertised on Facebook.
Neighbouring parishes – Bressingham and Fersfield PC, Brockdish PC, Dickleburgh PC, Gissing PC; Heywood PC; Hoxne PC; Shelfanger PC; Thrandeston PC; Tibenham PC; Tivetshall PC; Eye Town Council; Wortham & Burgate PC	Emailed stakeholder letter (see Appendix A)
Local Landowners and agents	Emailed/posted stakeholder letter (sent by individual steering group members)
Anglian Water	Emailed stakeholder letter
AONB Suffolk Coast and Heath	Emailed stakeholder letter
Babergh Mid Suffolk	Emailed stakeholder letter
Community Action Norfolk	Emailed stakeholder letter
Community Action Suffolk	Emailed stakeholder letter

CPRE	Emailed stakeholder letter
Environmental Agency	Emailed stakeholder letter
Essex and Suffolk Water	Emailed stakeholder letter
Gypsy Association	Emailed stakeholder letter
Highways England	Emailed stakeholder letter
Historic England	Emailed stakeholder letter
Historic Environment Services	Emailed stakeholder letter
Homes England	Emailed stakeholder letter
Ipswich Environment Agency (Planning)	Emailed stakeholder letter
Marine Management Organisation	Emailed stakeholder letter
National Grid	Emailed stakeholder letter
National Trust	Emailed stakeholder letter
Natural England	Emailed stakeholder letter
Network Rail	Emailed stakeholder letter
New Anglia local enterprise partnership	Emailed stakeholder letter
NHS	Emailed stakeholder letter
Norfolk and Waveney Clinical Commissioning Group	Emailed stakeholder letter
Norfolk County Council	Emailed stakeholder letter
Norfolk Chamber of Commerce	Emailed stakeholder letter
Norfolk Geodiversity partnership	Emailed stakeholder letter
Norfolk Wildlife Trust	Emailed stakeholder letter
Open Reach	Emailed stakeholder letter
RSPB	Emailed stakeholder letter
South Norfolk Council	Emailed stakeholder letter
Suffolk County Council	Emailed stakeholder letter
Suffolk Chamber of Commerce	Emailed stakeholder letter
Suffolk Constabulary	Emailed stakeholder letter
Suffolk Society	Emailed stakeholder letter

Suffolk Wildlife Trust	Emailed stakeholder letter
UK Power Networks	Emailed stakeholder letter
Vodafone/Telefonica	Emailed stakeholder letter
Water Management Alliance	Emailed stakeholder letter
Wildlife Trust	Emailed stakeholder letter

Several methods were adopted to ensure that all relevant bodies and parties were informed of the consultation as well as ensuring that local residents were made aware of the consultation provided with opportunities to provide their views and comments.

The approach aligns with updated Planning Practice Guidance with respect to Neighbourhood Plans and the Coronavirus pandemic.

The next section summarises the main issues and concerns and describes how these were considered in finalising the DDNP.

Summary of Stakeholder Responses to DDNP Regulation 14 which took place June to August 2021 and how these were taken into account

Stakeholders:

South Norfolk Council	26
Mid-Suffolk District Council	46
Bidwells (on behalf of GN Rackham & Sons Ltd)	55
Bidwells (on behalf of GN Rackham & Sons Ltd)	57
Bidwells (on behalf of HR Restoration ltd)	57
Diss Team Ministry	57
Eleanor Havers, on behalf of Mr & Mrs Havers of Poplar Farm	58
Eye Town Council	60
Gladman	61
Historic England	63
Hopkins Homes	63
National Grid	63
Norfolk Constabulary	64
Norfolk County Council	65
Norfolk Wildlife Trust, Mike Evans	67
NPS Property Consultants (on behalf of the Ling family)	67
Orbit Homes	68
Pigeon Investment Management (in partnership with Thelveton Estate)	70

Planning Issues, on behalf of Churchill Retirement Living	71
Revd Nigel Tuffnell	71
Revd Sarah Walsh	71
Savills on behalf of Norwich Diocesan Board of Finance Ltd	72
Scott Properties	74
Strutt & Parker on behalf of Scott Properties Ltd	76
Suffolk County Council	78
Suffolk Wildlife Trust	81
UK power networks	82
Waveney, Lower Yare and Lothingland Drainage Board	82
Williams Gallagher (representing the landowners of DIS1 and DIS3)	83

South Norfolk Council

Section	Comments	DDNP Response
6. Delivering Growth, Para 80 - Table 1 (page 19)	Place Shaping Team: In respect of Diss, the numbers do not completely align to those currently included in the GNLP (see Diss chapter of GNLP). This has the potential to cause confusion when confirming that the plan meets its overall housing requirement. It would be useful to update the table such that it is consistent with the latest figures included in the GNLP.	Amended numbers
Para 88 (page 21)	Place Shaping Team: This states that total for Scole is 30. Should this be 36?	Figures amended

Section	Comments	DDNP Response
<p>6.4 Sites in Diss (in particular, paras 95-99) (Pages 23-35)</p>	<p>Place Shaping Team:</p> <p>In respect of its ambitions for the “Waveney Quarter”, and in order to achieve a co-ordinated and coherent approach to development in this section of the Town, the Council would suggest that the Neighbourhood Plan group consider including an overarching policy that sets out their land-use policies for this part of the Town. Currently there are a series of site specific and thematic policies that set out the policy/requirements for this area that are included in different parts of the document. Bringing these elements together in a single overarching policy may make the overall ambitions clearer.</p> <p>The plan also does not seem to clearly articulate some of the ambitions of the Quarter as they have been explained to the Council, for example:</p> <ul style="list-style-type: none"> • there is reference at para 95 to an ambition improving connections between the river valley and the Town Centre but how this will be achieved does not come through clearly in the plan; • there is no explanation of whether the Council wishes to set out any policies that would relate to the future use, or relocation, of the bus station; and, • the plan appears silent on the redevelopment of the John Grose land or adjacent vacant building and whether they should be brought 	<p>New section ‘regeneration of the Waveney Quarter’ added to the plan which includes an overarching policy.</p> <p>Decision not to include anything on land adjacent to the Waveney Quarter including John Grose land.</p>

Section	Comments	DDNP Response
	forwards in a particular way that complements the ambitions for the Quarter.	
DDNP01 (Page 25)	<p>Place Shaping Team: It would be beneficial if the policy included references that the development be designed to include pedestrian and cycle connections that link to the existing network without the need to utilise the northern link road. For example, using a link via Farthing Close at the south-west and at an appropriate point onto Heywood road on the eastern side of the site. It would also be beneficial to express that any east-west link road should enable improved pedestrian and cycle links to Diss Sports Ground.</p> <p>The final bullet point refers to achieving sustainability improvements above building regulations. The council would simply note that Policy 2 of the emerging GNLP seeks a 19% reduction against Part L of the 2013 Building Regulations.</p> <p>Housing Enabling Officer: Only DDNP01 explicitly mentions an affordable housing percentage:</p> <ul style="list-style-type: none"> • I assume the 33% is consistent with existing and emerging Local Plan policies. • Why is this the only site to mention a percentage? • Have other sites been subject to a viability assessment that includes affordable housing? 	<p>Added</p> <p>This seems to contradict the previous point about not using the new link road.</p> <p>This has remained in the policy, but reference made to emerging GNLP in supporting text.</p> <p>Removed from the policy.</p>

Section	Comments	DDNP Response
	<p>I would not want affordable housing to be excluded by inference on other sites.</p>	
DDNP05 (Page 29)	<p>Place Shaping Team: The Council has identified the need to correct its assessment of the contribution to housing from communal accommodation. In the Council's view the correct ratio should be 1:1.8 rather than 1:8. This would increase the dwelling contribution from this site to 43 units.</p>	Amended
DIS2 (Page 31)	<p>Place Shaping Team: The Council understands from the Neighbourhood Plan group that DIS2 may now be in the same ownership as DIS7. If this is correct then consideration should be given to creating a single policy for the whole site, given that the delivery of development on DIS2 is dependent on DIS7.</p> <p>Development Management Officer: With regard to surface water drainage mentioned here and in other policies, whilst this reads as not an absolute requirement we would advise caution that the development still needs to be viable, so using the phrase 'any opportunity' could theoretically include things which are prohibitively expensive. Remember that any policy requirements need to be viable and not stifle development.</p>	<p>This has remained two separate allocations, specifically due to the sensitivity of being close to the River Waveney and potential for additional housing to be delivered nearer the river catchment if the two allocations were joined.</p> <p>Amended to remove the word 'any' but also expected that developers would argue viability if they needed to in relation to this anyway.</p>

Section	Comments	DDNP Response
DIS3 (Page 32)	Development Management Officer: NCC is not providing street lighting, as a general rule - only if there is a highway safety issue, or if the Town or Parish Council requires them. For the sake of clarity it might be best to state that if street lighting is to be included it should be provided in accordance with the dark skies policy, if that is the intention.	Amended
Para 122 (Page 33)	Place Shaping Team: Reference is made to the restaurant being delivered. We understand that this is the restaurant/public house. To avoid confusion that only part of the restaurant/public house has been delivered it would be useful to make the references consistent.	No longer relevant as this site has received planning permission.
DIS6 (Page 33)	Place Shaping Team: The policy allocates the land for a hotel. It is unclear from the document whether there is any specific objective evidence that justifies the need/viability of a hotel facility in Diss. The Council would recommend that the Neighbourhood Plan sets out the evidence that demonstrates the need and demand for, and viability of a hotel, and thereby justifies the restriction of the land for this purpose. The Council is concerned that in the absence of this evidence the policy may be difficult to justify or, even if it does come into effect, to subsequently defend in light of an application for alternative uses.	Time has moved on and the Churchill application for retirement flats here has been approved at Appeal, it is no longer allocated within DDNP. Wording added in relation to connectivity between the two sites, now DDNP14 and DDNP15. Use classes updated.

Section	Comments	DDNP Response
	<p>The Council also notes that the policy is more restrictive than the existing local plan allocation, both in terms of the range of appropriate uses and the overall area of the site that can be used for housing.</p> <p>The reduction in housing numbers does not lead to the Neighbourhood Plan falling out of general conformity with the strategic policies of the plan (provided that overall housing numbers remain consistent with those in the GNLP e.g. through over-provision elsewhere).</p> <p>However, should there be an absence of clear and compelling evidence as to the need, demand and viability of a hotel, the Council is concerned that further restriction on housing numbers or the potential alternative uses of the site may result in the development of the site being stymied. The Neighbourhood Plan group should give careful consideration as to whether the policy as currently drafted could result in this outcome, and therefore prevent the redevelopment of key parts of the Wensum Quarter.</p> <p>In the absence of clear and compelling evidence as to the need, demand and viability of a hotel, the Council would recommend that the Neighbourhood Plan group amends its policy to enable further alternative uses – for example development of uses within Class E of the</p>	

Section	Comments	DDNP Response
	<p>Use Classes Order. Should the Neighbourhood plan group be amenable to such a change, the Council would be happy to engage further with the Neighbourhood Plan group around specific wording.</p> <p>The Councils also notes that the Policy specifically requires the primary access point to be via the Roundabout with Morrison's Supermarket. The Neighbourhood Plan group should ensure that access is unencumbered third party landownerships. If unfettered access via the Morrison's roundabout cannot be achieved then this may again restrict the potential for the development of the site. In the absence of clear evidence that the site can be developed via a primary access from the Morrison's Roundabout, the Council would recommend that the Neighbourhood Plan group consider an alternative wording that requires that the development of the site enables access to the site via Morrison's Roundabout rather than restricting development to this condition.</p> <p>The Council also understands that the Neighbourhood Plan group's aspiration for the Wensum Quarter is to achieve connectivity between DIS6 and DIS7. If this is the case then it would be beneficial to set this out within the respective policies.</p> <p>Development Management Officer:</p>	

Section	Comments	DDNP Response
	<p>The site hasn't come forward for a hotel use, notwithstanding an extant planning permission.</p> <p>The Neighbourhood Plan doesn't reflect the latest Use Classes and needs updating. It refers to Class E uses (retail/employment) in the supporting text (para 122 – currently referenced as 'A2' uses) but not in the policy. Some of the previous Local Plan allocation uses such as retail/employment may also no longer be suitable, given the potential impacts identified with previous planning applications.</p> <p>There is a question over viability with contributions to green infrastructure, improved surface water drainage etc. The policy doesn't fully reflect the supporting text.</p> <p>The main concern I have is that the site was purchased by the current owners for a retirement homes complex, and they have already appealed the current application as non-determined. There is potential that this appeal could be determined before the NP reaches Reg.16 and links to the point about clearly demonstrating that a hotel is viable/deliverable and considering what else might be appropriate if it isn't.</p>	
Para 126 (Page 34)	Place Shaping Team: The paragraph refers to class A2. This is now encompassed within Class E of the Use Classes Order	Use classes amended.

Section	Comments	DDNP Response
	<p>as amended. The Council would recommend that this reference is updated.</p> <p>Development Management Officer: In light of the changes to the Use classes, further consideration may be needed to the wording of this paragraph. Think about whether the whole range of Class E is to be included.</p>	
DIS7 (Page 34)	<p>Place Shaping Team: The allocation is relatively narrow in terms of definition of allowed uses. As the Neighbourhood Plan group is aware, the Council is currently exploring options for the relocation of the Diss Leisure Centre. Whilst the Council remains open to exploring any opportunity presented by the DIS7 site, we would note that the Council has significant reservations about whether this site could viably meet its requirements.</p> <p>The narrow definition of allowed uses may be detrimental to achieving the Neighbourhood Plan's overall aspirations for the Wensum Quarter. If the leisure centre is not relocated to this site it is unclear whether there is a need/demand for alternative leisure uses that would utilise a site of this size. The Council would recommend that the Policy is broadened, allocating the site for leisure, housing and other commercial, business and service uses as defined with Class E of the Use Classes Order 1987 (as amended).</p>	<p>New text added: DDNP14 is the preferred site for the new Diss Leisure Centre. If the Diss leisure centre is relocated elsewhere, other commercial, business and service uses as defined with Class E of the Use Classes Order 1987 (as amended) would be acceptable.</p>

Section	Comments	DDNP Response
	<p>The Council also notes that the policy does not explicitly seek the expansion of footway/cycleway provision across the frontage of the site. This is understood to be an aspiration of the Neighbourhood Plan group and therefore consideration should be given to including this as a policy requirement.</p> <p>As with DIS6, the Council also understands that the Neighbourhood Plan group's aspiration for the Wensum Quarter is to achieve connectivity between DIS6 and DIS7. If this is the case then it would be beneficial to set this out within the respective policies.</p>	<p>Added this to the policy</p> <p>Added this to the policy</p>
DIS9 (Page 35)	<p>Place Shaping Team:</p> <p>The Council notes that the Walking and cycling network includes the route of Walcott Green to Frenze Road, adjacent to the site, but that there are currently no cycling and walking links along this part of Walcott Green. The Neighbourhood Plan group should consider including a requirement that any development provide walking and cycling links along its western boundary to achieve this link alongside the footway links to the to the town centre and railway line. Consideration should also be given to including a requirement to delivery improve cycleway links to the town centre and railway station, as well as footways.</p>	<p>Added to the policy</p> <p>Policy on Diss Business Park added</p>

Section	Comments	DDNP Response
	<p>The Council would also suggest that the Neighbourhood Plan group consider including a site specific policy to cover the undeveloped parts of DIS 10 from the 2015 South Norfolk Site Specific Allocations and Policies Document. Such a policy could set out that any replacement permission takes a co-ordinated approach to the delivery of infrastructure with the adjacent DIS9 allocation. This could help ensure a connected network of cycleways/footways are delivered along Sandy Lane/Walcott Green consistent with the proposed walking and cycling network as set out on Map 7.</p>	
DDNP06 (Page 37)	<p>Place Shaping Team: The Council notes the policy requirement for the Parish Council to be consulted at each stage of the planning process. The Council confirms that it will meet its statutory obligation to consult the Parish Council at appropriate stages of the planning process in accordance with the Statement of Community Involvement. The Council does not consider that there are specific reasons related to the development of this site that would mean that it needs to go beyond its adopted practice.</p> <p>Development Management Officer: See comments on DIS3 regarding street lighting.</p>	<p>Noted and removed</p> <p>Amended</p>

Section	Comments	DDNP Response
Policy 2: Housing Mix (Page 44)	<p>Place Shaping Team: The Council notes the requirement for major residential development to include plots for self-build. The Council has assumed that by 'major development' the Neighbourhood Plan is referring to sites of 10 or more homes. The Council considers that the policy is currently unclear on how many plots would be required as part of any development. In order to ensure that it meets the basic conditions, the Council considers that the policy be clear on how many self-build plots would be required on sites.</p>	<p>Wording updated to reflect - Proposals that would make a proportion of serviced dwelling plots available for sale to self-builders or custom builders will be supported where in compliance with other policies in DDNP. Major residential developments will be expected to provide 5% self or custom build properties on site through the provision of serviced plots unless this can be satisfactorily demonstrated to be unfeasible. Once completed and available for development, the serviced plots should be marketed for a period of not less than 12 months. If following this period any of the serviced plots remain unsold they may be built out by the developer.</p>
6.10 Affordable Housing, Para 161 (Page 45)	<p>Housing Enabling Officer: Will the comment about need being 'not overwhelming' and 'perhaps reduces the need for Rural Exception sites' have an adverse impact? Evidence of local need can build up over periods much shorter than the NP period to 2038.</p> <p>Social Rent – I would be happier if this reference was to the broader 'socially rented homes' in this paragraph. It includes Social Rent and Affordable Rent, plus Intermediate Rent. See also my comment on Policy 3. But I note the preference for Social Rent in Para 164.</p> <p>Shared ownership – I think I am content other affordable ownership tenures are not included</p>	<p>Amended</p> <p>The HNA is specific in relation to social rent, so left this as is.</p>

Section	Comments	DDNP Response
	because evidence explicitly supported shared ownership over Discounted Market Sale. I note no mention of shared equity, although I think that absence is acceptable.	
6.10 Affordable Housing, Para 163 (Page 45)	Housing Enabling Officer: Again, there is a reference to there being 'no pressing local need'. Please see comments on 6.10. I suggest deleting this phrase.	Phrase deleted
6.10 Affordable Housing, Para 164 (Page 45)	Housing Enabling Officer: Would the preference for social rent accommodation take precedence over later HNA evidence at the District level? Note that Mid Suffolk would negotiate for 3 parishes, and their evidence might differ from Greater Norwich's and Mid Suffolk's. Similar query in relation to the wish for bigger discounts for discounted sale.	More recent evidence would prevail
Policy 3: Affordable Housing (Page 46)	Place Shaping Team: To meet the Neighbourhood Plan ambition and to ensure that the plan meets the basic conditions, the Council would recommend that paragraph 168 is included within the policy. In respect of the third paragraph of the policy, the Council would note that the Government issued guidance on 24 May 2021 setting out that a minimum of 25% of all affordable units secured through	Agree This is national policy, include reference to this in supporting text

Section	Comments	DDNP Response
	<p>developer contributions should be First Homes, which are a discounted home for sale product.</p> <p>Housing Enabling Officer: What are the practical implications of the preference for Social Rent? How would it influence negotiations with developers?</p>	
6.10 Affordable Housing, Para 168 (Page 46)	<p>Housing Enabling Officer: Diss Housing Needs Assessment – Having looked at the research (footnote 15), it does distinguish between Social Rent and Affordable Rent in its analysis. I did not see an explicit conclusion about the relative need for Social Rent, but I might have missed it.</p>	<p>Section 1.4 of the HNA, main findings for tenure and affordability, that ‘future provision should focus on social rather than affordable rented housing where possible’.</p>
Community Policy 1 (Page 47)	<p>Place Shaping Team: On the subject of the Community Policies in general, it is noted that para. 73 refers to these as ‘Community Actions’, so there is an inconsistency in how these are titled throughout the document. We feel that ‘Community Actions’ is a more suitable title, as it is less misleading than ‘Community Policy’, which implies that these may have the same statutory weight as the other planning policies throughout the document.</p> <p>Housing Enabling Officer: This is based on prior discussion with the NP consultants. It is recognised that we have a formally-adopted cascade that does not include parishes</p>	<p>Amended so all ‘community actions’.</p>

Section	Comments	DDNP Response
	outside South Norfolk. I note the August 2020 comments from South Norfolk Council regarding this issue.	
6.11 Design (Pages 48-51)	Place Shaping Team: The Council recommends that the Neighbourhood Plan group considers the content of this section in light of the revisions to the NPPF published on 20 July 2021, and in particular the amended reference to design codes.	Reviewed
Policy 4: Design	Senior Heritage & Design Officer: Policy 4a and Para 189 refer to site specific design codes. However they do not state when they should be required; simply for 'larger sites'. It may be useful to quantify this to give some clarity - say above 10 units, for example, or perhaps even larger sites such as 20+? Smaller sites can be designed in accordance with the National Design Guide, Place Making Guide, Diss guide and National Model Design Code. Perhaps it could also be added that the level of design code requirements should be proportionate to the size of the site, as detailed design codes for smaller sites would be quite a cost?	Policy updated to reflect major development Smaller sites can be designed in accordance with national design guide etc, added to supporting text directly following the policy. Wording added to the supporting text to reflect proportionality.
Table 2 (Page 52)	Place Shaping Team: The Council would recommend that specific infrastructure schemes to be delivered through development should be specifically referred to in this	This is not a policy, decision not to do this.

Section	Comments	DDNP Response
	<p>table. For example, the new east-west link road to be delivered as part of DDNP01; the cemetery extension; the extension to the riverside walk/new park (referred to be delivered as part of DIS2); and the more general contributions towards recreational open space/children’s play. It may also be beneficial for the NP to set out any specific priorities within this table e.g. the extension of the riverside walk to the bridge at Denmark street. Clearly articulating the Neighbourhood Plan’s infrastructure ambitions is likely to help future infrastructure funding bids or negotiations.</p>	
<p>Policy 5: Green Corridors (Page 58)</p>	<p>Place Shaping Team: To help ensure that it is evident how a decision maker should react to a development proposal the Council would recommend that the Neighbourhood Plan clarifies what an “appropriate” net gain in biodiversity is for the purposes of the policy and whether it is intended to exceed the 10% net gain required by the emerging GNLP policy.</p>	<p>Amended to specify measurable net gains in biodiversity which exceed national or local policy requirements</p>
<p>Figure 6 (Page 59)</p>	<p>Place Shaping Team: The numbers listed included on the GI map do not seem to be explained.</p>	<p>Numbers removed</p>
<p>Policy 6: Road Traffic Improvements (Page 61)</p>	<p>Place Shaping Team: The Council would welcome further joint working with the Town Council to try and address highway</p>	<p>Amended, improvements need to be aligned with growth, to avoid a severe impact on the road network</p>

Section	Comments	DDNP Response
	<p>constraints. However, to help ensure that it is evident how a decision maker should react to a development proposal the Council would recommend that the Neighbourhood Plan clarifies what it considers to be “Significant Growth” in addition to the Total Housing Commitment listed in Table 1. The Council would note that it will be obliged to take account of the most recent evidence available in making decisions about the level of growth to be planned for any particular location. The Council notes that paragraph 111 states that “development should only be prevented or refused on highway grounds if there would be unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”. This sets a high bar for the scale of impact needed to resist development due to its impact on the highway network in the absence of highway safety issues.</p>	
Map 7 (Page 64)	<p>Place Shaping Team: The Council welcomes the Neighbourhood Plan’s identification of a walking and cycling network and proposed improvement. The Council recommends that consideration be given to identifying a link, probably using Heywood Road, to the DDNP01 allocation as part of the Walking and Cycling Network and also give consideration as to whether improved walking and cycling links to Diss Sports Ground (that should be</p>	<p>Added a new cycle link connecting the new development north of the cemetery and a long Heywood Road</p>

Section	Comments	DDNP Response
	facilitated through the DDNP01 allocation) should also be reflected.	
Map 8 (Page 65)	Place Shaping Team: The Council welcomes the identification of a rural walking and cycling network and the potential benefits to neighbouring villages, and the facilitation of active and sustainable transport, that could result from its implementation.	
Policy 8: Diss Leisure Centre (Page 68)	Place Shaping Team: The Council welcomes the inclusion of a criteria based policy for the relocation of Diss Leisure Centre.	
Policy 10: Funding and Delivery of Infrastructure (Page 70)	Place Shaping Team: Taking account of paragraph 257, the Council would recommend that the policy specifically requires that developers with major development proposals submit an infrastructure impact statement which assesses the impact of the proposed development on local infrastructure. This will help ensure clarity around the requirements of the policy.	Added to policy
Community Policy 5 (Page 73)	Place Shaping Team: The Council welcomes the proposal to develop a Town Centre Action Plan to help facilitate improvements to the town centre and maintain/enhance its vitality.	

Section	Comments	DDNP Response
Policy 11: Strategic Gap between Diss and Roydon (Page 74)	<p>Place Shaping Team: The Council welcomes the Neighbourhood Plan's intention to maintain visual separation and the distinctiveness of Diss and Roydon village. The Council does however question why reference is included to wildlife value in a strategic gap policy, the primary purpose of which is maintaining physical and visual separation? Is this issue already covered by the Green Infrastructure Policy? The Council would recommend that the Neighbourhood Plan elaborates on why this designation would not prevent Diss and Roydon meeting future development needs.</p>	Policy amended to remove reference to wildlife value and text added with respect to the gap not preventing future development needs from being met.
Policy 12: Local green Space (Page 77)	<p>Place Shaping Team: Recognising that the plan only allows the development of local green space in exceptional circumstances, to help ensure that it is evident how a decision maker should react to a development proposal the Council would recommend that the Neighbourhood Plan clarifies whether the policy seeks to maintain local green space of equal quantity or whether qualitative enhancements could compensate for loss of local green space. This is currently unclear in the policy.</p> <p>In addition, to ensure the policy reflects the significant weight that is afforded to the protection of Local Green Spaces (equal to that of Green Belts), we would advise that the word 'clearly' in the first sentence of</p>	<p>LGS policy and supporting text updated. Replacement clause removed from the policy.</p> <p>Policy updated and this comment is no longer relevant.</p>

Section	Comments	DDNP Response
	<p>paragraph 2 is replaced by 'significantly' or 'substantially'.</p> <p>In addition, one of the proposed LGS is the Diss High School Playing Fields. The NPPF states that local planning authorities 'should give great weight to the need to create, expand or alter schools through the preparation of plans', and the designation of the playing fields as a Local Green Space would place limitations on the possible future expansion of the school. Officers are aware, through the examination of the Taverham Neighbourhood Plan, of school playing fields being removed from lists of potential Local Green Spaces for this reason. In addition, South Norfolk Council would not support a designation that would restrict the leisure centre being able to potentially relocate to this site.</p>	<p>Diss Town Council and the community feel strongly that this should be included. We will leave this to be tested at examination</p>
<p>Policy 13: Protection of Important Views (Page 87)</p>	<p>Place Shaping Team: The Council welcomes the identification of important local views.</p>	
<p>Community Policy 6 (Page 96)</p>	<p>Place Shaping Team: The Council welcomes the Town Council's intention to work with key partners to promote and enhance the Heritage Triangle.</p>	

Section	Comments	DDNP Response
Policy 14: Designated and Non-Designated Heritage Assets (Page 105)	Place Shaping Team: The Council welcomes the Neighbourhood Plans recognition of the important of both designated and non-designated heritage assets.	

Mid-Suffolk District Council

Section	Comment	DDNP Response
Ref' to the ... 'Babergh & Mid Suffolk Joint Local Plan'	<p>The DDNP contains a factual error at paragraph 41 and, elsewhere, it uses various descriptions for the emerging Babergh & Mid Suffolk Joint Local Plan (the BMSJLP). At para 41 (including the footnote):</p> <ul style="list-style-type: none"> • The BMSJLP end date should read 2037 (not 2036 as stated), • Only Brome, Palgrave and Stuston are identified as Hinterland Villages. Oakley is identified as a Hamlet (see Table 03, BMSJLP, pg 37 - 38). <p>The most recent version of the BMSJLP is the Pre-submission (Reg 19) document dated November 2020. This was submitted to the Secretary of State in March 2021. The Examination Hearing Sessions are due to reconvene in September 2021. We ask that all references to the BMSJLP be consistent throughout. We have found the following variations:</p> <ul style="list-style-type: none"> • para 79: "Babergh and Mid-Suffolk Joint Local Plan (JLP)" • para 144: "Regulation 19 version of the Joint Local Plan (JLP) for Babergh and Mid-Suffolk" • para 148: "the emerging Babergh and Mid Suffolk Joint Local Plan (November 2020)" <p>[Nb: References to the BMSJLP, including the Plan end date, should also be checked and updated in supporting documentation as appropriate.]</p>	<p>All references updated to read BMSJLP which is also included within the glossary</p> <p>Other inconsistencies rectified</p>

<p>References to District Level Planning Policy etc. (e.g., Section 5.1)</p>	<p>This following on from our comment above and is applicable to all references to district and wider level planning policy documents and how these are referred to throughout the DDNP. Our colleagues at South Norfolk may also suggest something similar, and you should also be aware that, across both local planning authority areas, this will remain an evolving situation.</p> <p>To provide context and act as a reference point, it would be helpful to include a list or table; either at section 5.1 or as an Appendix to the DDNP, that identifies all the relevant adopted and emerging Local Plans. We have carried out our own search and, at the end of this response, include a table of the documents we found being referred to.</p> <p>We remind you also that, for Mid Suffolk, the Development Plan that is applicable to this NP Area currently comprises:</p> <ul style="list-style-type: none"> • the saved policies in the Mid Suffolk Local Plan (1998); • The Mid Suffolk Local Plan First Alteration: Affordable Housing (2006); • The Mid Suffolk Core Strategy Development Plan Document (2008); <i>and</i> • The Mid Suffolk Core Strategy Focused Review (2012). <p style="text-align: center;">Once adopted, all of the above will be replaced by BMSJLP.</p>	<p>Thanks, but decision not to include this</p>
<p>Para 58</p>	<p>The Area Designation consultation was run jointly by South Norfolk Council and Mid Suffolk District Council.</p>	<p>Amended</p>
<p>Figure 4 (pg 17)</p>	<p>Para 73 explains that the DDNP includes Community Actions, and that these are not strictly ‘planning’ related, i.e., they do not perform the same function as the Neighbourhood Plan Policies.</p> <p>To maintain that distinction, the title of the table image (inserted as Figure 4) should be amended to read: “ ... <i>Community Actions Matrix</i>”.</p> <p>The same should apply to any copy of this table in other documentation.</p>	<p>Amended</p>

Section 5.2 – The NPPF	<p>The DDNP Group could not have foreseen the publication of the revised National Planning Policy Framework (NPPF) on 20 July 2021. Also, and while not specifically stated, it is taken that all references to the NPPF within the DDNP are to the February 2019 document.</p> <p>The DDNP should be updated as necessary. For the most part, this may just mean changing a paragraph cross-reference, but the Group should also be mindful of the more detailed changes to the NPPF, e.g., in Chapter 12, which call for creation of high quality, beautiful and sustainable buildings and places.</p> <p>Nb: You may also want to first establish and then use the ‘NPPF’ acronym for convenience throughout the DDNP.</p>	References updated
Para 79	<p>For context, it would be helpful to clarify the base date of the BMSJLP: “Of these, a total of 49 already had planning permission <u>at the base date of the plan (1 April 2018)</u>, which leaves a requirement for 15 to be allocated.”</p>	Added
Table 1	<p>For Brome & Oakley etc., the column titled ‘Allocation on the Local Plan’ is technically incorrect. The BMSJLP (Nov 2020) allocates under Policy LS01, two sites in Oakley which, when combined, account for 15 net additional dwellings. These allocations are acknowledged at para’s 144 and 147.</p>	Updated to reflect current position of the JLP being split into two halves
DDNP 11	<p>The proposed site lies outside of but adjacent to the settlement boundary in the emerging BMSJLP (Nov 2020). We note the DDNP does not propose to establish a new settlement boundary for Brome to include this site, but we do recognise that the principle of development on this site is established.</p> <p>The policy should include similar wording to DDNP 12 & 13 with regard to requiring the applicant to submit a Heritage Statement, and consideration of mitigation strategies as appropriate. Development here has the potential to affect various designated heritage assets.</p>	Settlement boundaries have now been identified in the policy maps that accompany the DDNP
DDNP 12 & 13	<p>See also our comment above re Table 1.</p>	Noted

	The Council's Heritage Team welcome the reference to considering the impact of development on either plot on the significance of Weavers Cottage (Grade II) and requesting mitigation strategies in this regard but feel that there may be limited scope for mitigation.	
DDNP 11- 13:	On a note of caution, the Council's Strategic Housing Team have advised that these sites are unlikely to deliver any affordable housing on-site due to their size. Those that are large enough (0.5ha+ or 10+ dwellings) will not deliver sufficient affordable housing that they would be confident that a Registered Provider would take them on.	Noted
Para 159	It is disappointing that no reference is made to the policy position on affordable housing in Mid Suffolk, although we note para 160 refers to the Mid Suffolk Local Plan 2006 Alteration in the context of Rural Exception Sites.	Added further context in relation to this
Para 161	The first sentence should be deleted. The term 'overwhelming' is subjective, the sentence adds nothing to the Plan, and it could be used by developers to argue against affordable housing provision.	Deleted
Para 164 & Policy 3	Our Strategic Housing Team have commented that it is difficult to commit to delivering social rent. Due to changes in the way in which affordable housing is funded, Registered Providers are less likely to deliver/take on social rent properties, although they endeavour to make rents as low as they can.	This is already covered in the policy
Policy 3	Have the Group considered including within policy text a requirement that access to affordable housing is linked to households have a 'registered' need?	This is housing policy not planning policy
Para 175, 212 (etc.)	It would be helpful to clarify that, where the DDNP refers to the Joint Core Strategy, in these instances, it means the Joint Core Strategy for Broadland, Norwich and South Norfolk.	ok
Policy 4	Criterion b. requires new development to deliver significant biodiversity enhancements but does not explain what 'significant' might look like. As a starting point, we suggest ...	Policy now amended

	<p>b. delivering demonstrable net ecological gain to meet statutory requirements and, where appropriate, linkages to Green Corridors (Policy 5)</p> <p>Criterion c. makes no reference to connecting new developments to existing footpath and cycleway networks. We suggest ...</p> <p>c. ensuring good quality and safe access for people walking and cycling, including creating safe linkages to existing walking and cycling networks</p>	
Para 196	<p>Para 196 states that: “ ... <i>the local plan has green space requirements for new developments.</i>” Is this a particular local plan or should it read “... the neighbourhood plan has ...” ?</p>	Amended
Para 204	<p>Fourth bullet refers to Policy 3. This should read: “Policy 5 will help deliver ...”</p>	References updated
Policy 5: Green Corridors Figure 6	<p>Green Corridors form a key component of the Plan. They are discussed in detail in Section 7 (e.g., para’s 219 - 221) and in Policy 5. They are show in Figure 6 and are numbered 1 to 13.</p> <p>Question: Does each corridor have a name or descriptive title? If so, could these be included in the Plan either as a list or table to accompany Figure 6?</p>	The corridors are indicative at this time, the numbers have also been removed to avoid confusion.
Para 232	<p>Given this is meant to be a 15+ year plan, it might be better to say, ‘Coronavirus’ pandemic’ rather than ‘ current pandemic’. [Nb: we note that, in para 250, you specifically use the term Covid-19].</p>	Amend all references to say Coronavirus pandemic
Para 252	<p>What about Better Broadband for Suffolk? Are they doing / have they done anything worth mentioning for the residents of Palgrave, Stuston, and Brome & Oakley?</p>	Added reference to Suffolk
Policy 12: Local Green Spaces (LGS)	<p>The objectives of the policy are clear. We also welcome the desire to see connected local green spaces.</p> <p>Taking the requirements of the NPPF into consideration and having read the individual assessments in the evidence document, we support the allocation of the sites identified in the Mid Suffolk parishes as Local Green Spaces.</p> <p>Informally, we have spoken about our experiences of how LGS policy wording is being considered at the examination stage. This may differ from elsewhere. Para 282 provides an explanation for why the policy is worded as it is and, it will be</p>	LGS policy and supporting text updated to clarify the distinction from national policy on Green Belt

	interesting to see what, if any, modifications are proposed through the examination process.	
Map 10	A minor point. We recognise that the scale of Map 10 means it is not possible to show all 55 LGS. For sites that fall into this category (for us, they are LGS 22 and LGS 55) it might be sensible to add an explanation to the title of Map 10 along the lines of ... <i>(Nb: For the smaller Local Green Spaces identified here, please refer to Maps 11 to 17)</i>	The maps have been updated to ensure all LGS are visible
Policy 13 Maps 18 - 25 Key Views Supporting Doc	<p>Within the Mid Suffolk parishes, the identified views seem reasonable. The phrases 'Important Views', 'Important Local Views', 'Key Views' and, 'special views' are used variably across the DDNP and in the Supporting Document. It would be helpful to stick to one consistent description.</p> <p>There is a discrepancy between the locations / numbering of the views on Maps 18 to 25 in the DDNP and their counterparts in the Supporting Document. Para 285 in the DDNP also states that there are 44 views whereas the Supporting Document is titled 'Key Views (45)'.</p> <p>Assuming that the Supporting Document is correct, the error begins with View 2 (Oakley Park House from Oakley Park Drive). That would mean that Maps 18 to 25 in the DDNP all need updating.</p> <p>Table 2.1 (page 5) of the Supporting Document also incorrectly states that there are 7 views in Stuston whereas 9 are listed.</p>	<p>Updated to consistently refer to important local views</p> <p>Inconsistencies rectified</p>
Chapter 11: Historic Environment Policy 14 NDHA Supporting Evidence Report	<p>General:</p> <ul style="list-style-type: none"> • Para 301 Third line: 'Appraisals' • Footnote 30: Hyperlink does not appear to work. Amend to read: https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/ 	Typo rectified and link amended

	<ul style="list-style-type: none"> It is noted that there a relatively low number of NDHA inclusions for Palgrave and Stuston, and none for Brome and Oakley. Is this a true reflection of the situation in these parishes? <p>Policy 14</p> <ul style="list-style-type: none"> Para 301 refers to Policy 14 as ‘Non-Designated Heritage Assets,’ but we see that the title of the policy is given as ‘Designated and Non-Designated Heritage Assets.’ This reference therefore needs correcting. Last para’: Instead of ‘proposals that are adjacent non-designated heritage assets’ it may be better to say, ‘proposals for works to or adjacent to non-designated heritage assets’. The things on the list are equally applicable whether the proposal is for works to the asset or within the setting of the asset and the absence of reference to the former here seems odd. <p>Palgrave NDHAs</p> <ul style="list-style-type: none"> Wortham Common/Ling – This appears to be a reasonable inclusion. However, the maps should clearly define its extent. [Nb: It is a shame that Wortham Parish is not part of the designated NP area as that would have afforded an opportunity to identify the entire common as a single NDHA, rather than what will now become a fragmented area]. Land & Buildings either side of Lion Rd / Rose Lane, Priory Rd and Continuation of Lowe’s Lane – This appears to be an identification of an area and all buildings within it. The extent of the area is not clearly defined, but it all appears to be within the existing Conservation Area here. The area is thus already formally designated, so it should not therefore also be identified as a NDHA. Similarly, adding all buildings in this area would include buildings already formally listed. Formally designated assets should not be on a Local List. This allocation is also inadequate to cover any unlisted buildings within this area that are desired to be added to the list. The Councils Heritage Team 	<p>The same process was followed in each of the parishes to identify and assess NDHAs, it just so happens that fewer were identified and agreed in the Suffolk parishes.</p> <p>Updated</p> <p>Updated</p> <p>Point considered.</p> <p>This is a useful point, the NDHA has been removed.</p>
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	<p>would instead be happy to consider any amendments or additions to the Conservation Area, including the appraisal, that were put forward, plus entries into the Local List for individual unlisted buildings/structures within this area.</p> <p>Stuston NDHAs</p> <ul style="list-style-type: none"> • Roman Remains & Site of a Roman River Crossing – This does not raise any immediate concerns, although again, the maps should clearly define its extent. SCC Archaeology may be better placed to comment on the suitability of this identification. <p>NDHA Supporting Evidence Report</p> <ul style="list-style-type: none"> • In section 8.5, in the last box for this entry, the phrase ‘<i>as shown on</i>’ is duplicated. Also, in the same line, the word ‘<i>and</i>’ appears to be missing between the two historic maps referred to. 	<p>Point considered.</p> <p>Amended</p>
Monitoring and Review ?	It may be helpful to include an explanation that the DDNP will be subject to periodic review and, as necessary, modification because of changes to guiding planning policy. The logical place would seem to be a new paragraph inserted into Chapter 2.	Added

Statutory Consultee	Key points	DDNP response
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<p>Bidwells (on behalf of GN Rackham & Sons Ltd)</p>	<ul style="list-style-type: none"> • Object to proposed designation of Local Green Space Meadow and Wooded area north of Roydon Fen Track (No 39) on the basis that: <ul style="list-style-type: none"> ○ It is agricultural land, not a meadow and wooded area ○ The majority of the site is in private ownership ○ Part of the site is owned by Diss Parochial Church Council and they have not been notified of the intention to allocate the land as LGS ○ Whilst it is acknowledged there is wildlife associated with the site, the location of this is not accessible to the public and is only a small proportion of the site, so it would not hold particular significance to the local community. ○ The evidence document states that the site ‘provides a semi-natural buffer between the built-up area of Roydon village and Roydon Fen’ which is not consistent with the NPPF. ○ No justification has been provided as to how the boundaries of the proposed LGS have been identified. It is not clear why adjacent land, which includes a meadow has not been allocated. ○ The policy wording for Policy 12 is onerous and gives LGS the same designation as Greenbelt land, by requiring ‘very special circumstances’ to be demonstrated. This reverses the presumption in favour of development. It should be amended. • Object to inclusion of the Tower House as a NDHA on the basis that a heritage assessment undertaken to support the objection raises concerns that there is a lack of explanation/evidence as to how the Tower House fulfils the criteria. The Heritage Assessment provides detail with respect to each criteria, and indicates that it fails to meet it. Error identified in the NDHA assessment – reference to Natural England. Would like to see the site South of the High Road, Roydon allocated for residential development in preference to DDNP06. The Heritage Assessment concludes that there is potential to provide residential development without negatively impacting on the Tower House’s heritage significance. • Object to the allocation of DDNP06 south of Roydon Primary School on the basis that it is unsuitable for development: 	<p>Decision to remove Meadow and Wooded area north of Roydon Fen Track as an LGS from the plan.</p> <p>The NDHA supporting evidence assessment has been updated to reflect the points made.</p> <p>DDNP supporting documents including the SOA and SEA provide evidence to substantiate the allocation of land south of Roydon Primary School</p> <p>We consulted on an early version of the gap which subsequently changed. The Reg 15 submission version is the final plan not earlier consultations.</p> <p>The points about coalescence and maintaining gaps is correct, but DDNP is required to allocate to meet the indicative housing requirement in Roydon and</p>
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Statutory Consultee	Key points	DDNP response
	<ul style="list-style-type: none"> ○ There are a number of constraints relating to habitat, landscape, character, visual impact, highways and coalescence. ○ The strategic gap between Diss & Roydon reduced in size between community consultation and Regulation 14 to allow for the allocation. 80% of respondents to the community consultation strongly agreed that it was important to protect the gap, and therefore it is argued that views of residents have not been taken into account when allocating DDNP06. ○ The SEA states ‘development in this location will contribute to the coalescence with Diss’ ○ It is contrary to the JCS Policy 2 which requires that proposals respect local distinctiveness including ‘the historic hierarchy of the city, towns and villages, maintaining important strategic gaps’. ○ The allocation will result in additional pressure on the highway network at peak times ○ A land registry search indicates there are multiple owners with an interest in the site, which means the deliverability of the scheme is questionable. ○ In terms of visual amenity, a report prepared by Wynne Williams Associates, indicates that the visual effects of developing the site south of Roydon Primary School would be more significant than developing the land south of High Road. ● Land south of High Road, Roydon should be allocated with its suitability demonstrated through a range of submissions. It is also available, achievable and viable. ● Concerns raised about the SEA assessment of reasonable alternatives for Roydon. Eg. The SEA refers to a lack of clarity on whether direct access can be achieved from the A1066 to the site yet this evidence has been provided. 	<p>the site identified on balance was the best location for this.</p> <p>With respect to land ownership for land south of Roydon Primary School, due diligence has been carried out, assurances sought and given.</p>

Statutory Consultee	Key points	DDNP response
Bidwells (on behalf of GN Rackham & Sons Ltd)	<ul style="list-style-type: none"> • Object to Policy 1 due to the approach taken in relation to the proposed housing allocation sites in Scole. The preference of DDNP09 to land south of Bungay Road (GNLP0527R) is considered unjustified and unreasonable on the basis that: <ul style="list-style-type: none"> ○ Evidence was provided to address potential constraints identified in the 2019 SOA ○ There are fewer constraints relating to GNLP0527R than the proposed site allocation DDNP09 ○ The SEA considers GNLP0527R as a reasonable alternative, but in justification for the decision not to identify it as a preferred approach the SEA erroneously refers to it receiving less community support at consultation, but GNLP0527 has not been included in any public consultation. ○ No justification has been provided as to why GNLP0527 was not consulted upon. 	<p>It is not necessary to allocate the site with fewest constraints if it doesn't best fit with the growth strategy for the village.</p> <p>The text in the SEA with respect to consultation was a mistake and has been rectified.</p>
Bidwells (on behalf of HR Restoration Ltd)	<ul style="list-style-type: none"> • Support for inclusion of DDNP02 	Noted
Diss Team Ministry	<ul style="list-style-type: none"> • Would like to remove St Mary's churchyard from the list of local green spaces 	Decision that this will remain

<p>Eleanor Havers, on behalf of Mr & Mrs Havers of Poplar Farm</p>	<ul style="list-style-type: none"> • Request that DDNP reconsider the allocation of land off Factory Lane, Diss. • Request that Poplar Farm is removed as a NDHA on the basis that : <ul style="list-style-type: none"> ○ There are inconsistencies as Boundary Farm (constructed at the same time as Poplar and Sturgeons) is not listed ○ Poplar Farm is an important building within Brewers Green and the existing planning system provides an effective consultation and permission system prior to any changes being made to properties, therefore the designation is unnecessary and will cause additional complication and expense ○ The proposed inclusion of Poplar Farm as an NDHA is a duplication of the protection arising from the protection of 'Views in all directions over Brewers Green'. 	<p>The reasons for non-allocation of this site are given in the SEA. In summary, the large site falls partly within the identified strategic gap and extends beyond the DDNP area to the north. Whilst the site could deliver in excess of the housing requirements, development connected to the settlement at Factory Lane (within the strategic gap) would lead to direct coalescence with Roydon. Locating development at the northern extent of the site (within the DDNP area) could connect with Shelfanger Road; however, it would need to be brought forward alongside GNLP0362 or GNLP0606 to effectively connect with the existing settlement area. The potential level of housing this would introduce in this area of countryside would be significantly in excess of the housing target. For these</p>
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Statutory Consultee	Key points	DDNP response
		<p>reasons, the site is not considered as a suitable site to progress.</p> <p>Boundary Farm is not within the DDNP area. Although important at present the building has no particular planning status. Protection of views is different</p>

Statutory Consultee	Key points	DDNP response
Eye Town Council	<ul style="list-style-type: none"><li data-bbox="436 282 739 311">• No matters of note	Noted

<p>Gladman</p>	<ul style="list-style-type: none"> • The housing requirement set by the district councils should be clarified, this is a 'minimum requirement' • Detailed point about the HNA not setting the housing need. • DDNP states that a number of potential sites have been put forward to the DCs and DDNP during development of the plan and these have been assessed. The site that Gladman are promoting has not been included within this or SEA. • Concern that the DDNP has carried forward sites from the previous SNLP as these have not been delivered over the last 6 years. Indicating that we need to demonstrate that the land is 'considered deliverable'. • Two sites cannot be considered allocations as they have existing uses and therefore not currently available. • Policy 2. Policy relating to self-build would not work in practice, more flexibility is required – ie if not taken up within 12 months of initial promotion they revert back to house builder. • Policy 4 design. Significant biodiversity enhancements considered too subjective. • Policy 5 Green Corridors. Suggest second para reworded to say 'development proposals for new development within or adjacent to a green corridor will be supported where they are able to demonstrate how they deliver appropriate net gains in biodiversity or qualitative improvement to the corridor'. • Detailed information provided on the site they are promoting. Land at Burston Road. 	<p>It is necessary to use the indicative housing requirement provided by the planning authority, as per PPG.</p> <p>The carry forward sites have been included in an updated version of the SOA, as has the site being promoted by Gladman. This has also been included within the SEA Environmental Report assessment of alternatives.</p> <p>The SNLP runs to 2026, so we are well within the plan period still. DDNP has assurances from the landowner/agent that the sites are available, a planning application is expected on one.</p> <p>The two sites in question have been dropped by the GNLP</p> <p>12 month period added with respect to self-build</p>
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Statutory Consultee	Key points	DDNP response
		<p>Reference in the plan to significant biodiversity enhancements has been removed.</p> <p>Disagree with wording suggestion with respect to green corridors. The policy has since been updated to reflect various comments received through this process.</p>

Statutory Consultee	Key points	DDNP response
Historic England	<ul style="list-style-type: none"> No capacity to provide specific comments 	Noted
Hopkins Homes	<ul style="list-style-type: none"> Policy 2: The evidence to support a particular requirement for additional one-bed dwellings is weak. The HNA indicates a greater need for 3, 4 and 5 bed properties. One-bed dwellings are disproportionately more expensive to build and less efficient in their ground coverage, hence why 2-bed dwellings represent entry-level for the majority of households. Policy 3: the focus towards social rent is at odds with the NPPF which requires at least 10% of affordable housing to be provided for affordable home ownership. Policy 10: First para unnecessary and relevant statutory undertakers will be consulted on for all major residential development proposals. DDNP09 is unavailable for development and should therefore be removed from the DDNP. Recommended that DDNP09 is replaced with an alternative site, land east of Norwich Road, for a minimum of 75 dwellings together with open space. Allocation of this site would deliver the following benefits: <ul style="list-style-type: none"> Provision of construction access to DDNP08 Contribution towards new traffic calming measures on Norwich Road Logical extension to the village Provision of a footpath to the playing fields Provide a range of house types incl affordable housing 	<p>The HNA sets out that the greatest need is for 3 bed, 50% of new homes should be this, with a smaller proportion of 1, 2 and 4+ bed. The document has been amended accordingly.</p> <p>Policy amended.</p> <p>Land at Rose Farm (previously DDNP09) has been removed from DDNP. The alternative allocation land east of Norwich Road has been identified for 50 dwellings.</p>
National Grid	<ul style="list-style-type: none"> Identification that a range of National Grid assets fall within the DDNP area. Provision of guidance in relation to development close to National Grid infrastructure. 	Guidance reviewed and noted.

Statutory Consultee	Key points	DDNP response
Norfolk Constabulary	<ul style="list-style-type: none"> • Reference to the Secured by Design initiative which seeks to improve the security of buildings and their immediate surroundings. • Concern that additional 494 new homes will result in an unfunded requirement on police resources. Recommend that additional provision / infrastructure requirements are referenced in policy. • Suggestion of additional aim – create and maintain a safer community and reduce crime and disorder • Add principles of crime prevention into design policy, with specific reference to all new developments conforming to the ‘secured by design’ principles • Policy 10 on infrastructure should include delivery of local initiatives to create safer communities. 	<p>Decision not to include the aim suggested.</p> <p>Reference to Secured by Design added to the Design Policy supporting text</p> <p>Decision not to include provision of police services as a local priority in relation to infrastructure funding</p>

<p>Norfolk County Council</p>	<ul style="list-style-type: none"> • Ecology: the term ecology could be changed to ‘natural environment’. Policy 4 recommended that significant biodiversity enhancement is quantified and that the DEFRA biodiversity metric (or similar) is used to demonstrate net gains. Amend terminology so that it is consistent – currently refers to ‘significant biodiversity enhancements’, ‘BNG’ and ‘positive impact on ecology’. Policy 5 welcomed but guidance on how ‘maximising habitat opportunities’ should be provided as it will be hard to assess applications against this otherwise. • Landscape: Thorough and detailed review of green infrastructure and good to see joined up working in relation to LGS and green corridors. Policy 5, 7 & 8 supported. • LLFA: No specific section on flooding, which could be a comprehensive way to cover all the issues. Flooding elements of the allocation policies appear unevidenced/unjustified as they appear out of context. There is no reference to SuDS. The following amendments are recommended: <ul style="list-style-type: none"> ○ There are some references to flooding and drainage as a whole within the submitted report. References are somewhat generic in scope with minimal information. We advise there is scope to develop upon this. ○ The policy wording for DDNP05 should be amended. The final paragraph of the policy should be deleted: <i>‘The drainage layout must be agreed with the Lead Local Flood Authority. The approved scheme will be implemented prior to first occupation.’</i> ○ We advise that there could be further scope to incorporate references to water quality management, local amenity and biodiversity benefits through sustainable drainage implementation. ○ We would advise reference to Norfolk County Council (NCC) – Lead Local Flood Authority (LLFA) Statutory Consultee for Planning: Guidance Document is included within the Neighbourhood Plan. <p>Additional evidence is provided in relation to flood incidents and the risk of flooding on the allocated sites. Furthermore, the following is recommended for inclusion: Any new development or significant alteration to an existing building within the Neighbourhood Plan area should be accompanied by an appropriate assessment which gives adequate and appropriate consideration to all sources of flooding and proposed surface water drainage. Any application made to a local planning authority will be required to demonstrate that it would:</p> 	<p>Terminology reviewed to ensure consistency and appropriate use</p> <p>Application required to be accompanied by an ecology report which demonstrates how habitat opportunities will be maximise.</p> <p>Included a new section on flood and water management</p> <p>Included the recommended text from the LLFA, although it is recognised that much of this is already set out in local and national policy.</p> <p>Recommended policy amends made to include Minerals & Waste safeguards</p> <p>With respect to highways comments on the former Infant School, the allocation will remain but the policy specifically requires that</p>
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Statutory Consultee	Key points	DDNP response
	<ul style="list-style-type: none"> • Not increase the flood risk to the site or wider area from fluvial, surface water, groundwater, sewers or artificial sources. • Have a neutral or positive impact on surface water drainage. • Proposals must demonstrate engagement with relevant agencies and seek to incorporate appropriate mitigation measures manage flood risk and to reduce surface water run-off to the development and wider area such as: <ul style="list-style-type: none"> • Inclusion of appropriate measures to address any identified risk of flooding (in the following order or priority: assess, avoid, manage and mitigate flood risk). • Where appropriate undertake sequential and /or exception tests. • Locate only compatible development in areas at risk of flooding, considering the proposed vulnerability of land use. • Inclusion of appropriate allowances for climate change. • Inclusion of Sustainable Drainage proposals (SuDS) with an appropriate discharge location. • Priority use of source control SuDS such as permeable surfaces, rainwater harvesting and storage or green roofs and walls. Other SuDS components which convey or store surface water can also be considered. • To mitigate against the creation of additional impermeable surfaces, attenuation of greenfield (or for redevelopment sites as close to greenfield as possible) surface water runoff rates and runoff volumes within the development site boundary. • Provide clear maintenance and management proposals of structures within the development, including SuDS elements, riparian ownership of ordinary watercourses or culverts, and their associated funding mechanisms. • Minerals & Waste: Minor policy amendments recommended for DIS2, DIS3, DIS6, DIS7 and DIS9 to ensure conformity with NPPF. • Transport: DDNP02, not clear how adequate access can be achieved. DIS9, add 'carriageway widening to a minimum of 5.5m and provide a 3.0m wide shared use footway/cycle way for the full extent of its frontage at Sandy Lane, to connect with the existing facilities to the west and south'. DDNP09, will need to see the further assessment work and data to ensure adequate access can be achieved. 	<p>suitable access is established. It is recognised that this will require additional land from the car park for delivery, any permission would therefore be dependent on this being achieved.</p>

Statutory Consultee	Key points	DDNP response
Norfolk Wildlife Trust, Mike Evans	<ul style="list-style-type: none"> • Thank you very much for consulting Norfolk Wildlife Trust on the draft Neighbourhood Plan. We are pleased to see a plan with strong biodiversity policies. We support the inclusion of support for green infrastructure provision and enhancements to the wider countryside around the County Wildlife Sites in the plan area and the green corridor network, in both the housing allocations and the wider plan area policies. We are also encouraged to see reference to Norfolk Wildlife Trust’s Claylands Living Landscapes programme. • One recommendation for addition to the plan would be for direct reference to the adjacent Diss Cemetery CWS in the policy text, in line with the references to nearby CWS in other allocation policies in the draft plan. 	Included reference to Diss Cemetery CWS in DDNP1
NPS Property Consultants (on behalf of the Ling family)	<ul style="list-style-type: none"> • Land should be allocated for development in Palgrave. There has been no assessment of sites submitted by the Ling family or public consultation on their inclusion in the DDNP. • Palgrave is a more sustainable location for growth than Brome and Oakley. • There is a need for a new school in Palgrave, infrastructure which has not been pursued in the DDNP. The existing school site is constrained and cannot be expanded. • The Ling family has worked with the school and put forward land to provide a new / expanded school as part of developing land north of Lion Road for approx. 45 properties. This should be considered more fully in the plan. 	<p>There is no requirement to allocate housing in Palgrave. The local planning authority have confirmed that the allocation of 12 homes is sufficient to meet the indicative housing requirement. In addition the community were not in favour of allocating in Palgrave.</p> <p>These sites have been included in the updated SOA.</p>

Orbit Homes	<ul style="list-style-type: none"> • Land east of Norwich Road, Scole – supportive of re-allocation. Confirm that the site is deliverable. Number of homes – would like to promote 35 dwellings to make most efficient use of land. • Do not support inclusion within the policy of requirement for construction traffic to go an alternate route as this renders the site undeliverable and creates a ransom. Suggest a construction management plan setting out mitigation measures for existing residents. • Housing mix not currently correct as per AECOM HNA • Objects to the requirement for self-build in policy 2, setting out that we have not assessed the need for self build locally. Suggestion that it is unlikely that self-builders will want to build on major development sites, more likely on smaller sites. Suggest that DDNP includes a policy that allows single plots to come forward for self-build dwellings where they are suitably located within or adjoining development boundary. 	<p>35 dwellings will not meet the 25dph requirement of policy 2.</p> <p>The policy includes text that vehicular access will be onto Norwich Road through DDNP10, unless it can be demonstrated this is unfeasible.</p> <p>The requirement for a construction management plan has been included to demonstrate how impacts on existing residents of Flowerdew Meadow will be mitigated.</p> <p>In relation to self-build within the Design policy, we've added text to reflect that once completed and available for development, the serviced plots should be marketed for a period of not less than 12 months. If following this period any of the serviced plots remain</p>
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Statutory Consultee	Key points	DDNP response
		unsold they may be built out by the developer.

Statutory Consultee	Key points	DDNP response
<p>Pigeon Investment Management (in partnership with Thelveton Estate)</p>	<ul style="list-style-type: none"> • There is an opportunity to allocate additional sites over and above the minimum requirement. Land at Walcot Green Lane (GNLP1044) is promoted on this basis, for 120 homes. • The Aecom SOA refers to highway constraints at GNLP1044, following this assessment Pigeon has secured necessary land to address these issues. This is detailed in accompanying Delivery Statement for Land at Walcot Green Lane. Highways are no longer a constraint in relation to the land being developed. • DDNP04: The requirement to deliver improved connections to the Railway Station are dependent on Greater Anglia accommodating such changes and therefore the policy requirement should be amended. • Policy 2: A blanket requirement for self-build plots is not appropriate. Their experience shows that people wish to build their own home within or close to their existing community and seek individual plots in either village or semi-rural locations. Land at Walcot Green Lane would include such provision. • Policy 6: May wish to consider opportunities for wider road infrastructure improvements beyond those set out in Policy 6. The new link road (proposed as part of DDNP01) could be extended east between Walcot Green Lane, Walcot Road and Burston Road, creating a northern link road. The feasibility of this could be explored in relation to land at Walcot Green Lane coming forward. 	<p>Yes, but decision not to do this.</p> <p>The additional evidence in relation to highways was considered as part of the SOA review in 2022.</p> <p>Amended supporting text for DDNP04 to reflect this</p> <p>Text updated around self-build to reflect concerns, as per other stakeholder comments also.</p> <p>Wider road infrastructure improvements to be considered at the DDNP's first review.</p>

Statutory Consultee	Key points	DDNP response
Planning Issues, on behalf of Churchill Retirement Living	<ul style="list-style-type: none"> • Support for Policy H2 with a request that further emphasis is placed on provision of specific housing for older people • Policy DIS 6 is unsound as its evidence base is not justified nor are the requirements reasonable or practical on the basis that: <ul style="list-style-type: none"> ○ The site does not appear in the Site Options and Assessment, instead DDNP relies on historic evidence from the adoption of the SNLP, 2015. There is no reasoned justification for the housing requirement of 5 homes. ○ Whilst the site is undeveloped it does have a planning history of applications over the last 10 years. Recent pre-application advice indicates SNC no longer wish to see the site allocated in line with the historic policy and historic consents on which the Neighbourhood Plan is based. ○ The DDNP evidence base fails to provide any evidence to support the allocation for a hotel. A Review of Hotel Market Needs in Diss (Lichfield) is provided to demonstrate there is no evidence of need for a hotel. ○ The requirement in DIS6 for the primary access point to be off the roundabout with Morrisons Supermarket is unreasonable as it is in the ownership/control of a third party ○ Request that the DDNP should allocate the site for 73 Specialist Retirement dwellings to address the identified housing need. 	Site has been removed from the plan as it has now received planning permission for a retirement development.
Revd Nigel Tuffnell	<ul style="list-style-type: none"> • Would like St Andrew's churchyard to be removed from the list of Local Green Spaces. 	Amended the policy to reflect concerns and ensure conformity with the NPPF.
Revd Sarah Walsh	<ul style="list-style-type: none"> • Would like to remove St George's churchyard from the list of local green spaces 	Amended the policy to reflect concerns and ensure conformity with the NPPF.

<p>Savills on behalf of Norwich Diocesan Board of Finance Ltd</p>	<ul style="list-style-type: none"> • The results of the survey (summer 2020) appear to have been the predominant factor in determining the allocation of sites. Only 52 people responded from Burston & Shimpling, which is a very small number. Concern that the community was not given enough information to determine which site they favoured. • Concern that no or inadequate information has been published to show how full consideration was given to inclusion of part of the land at Rectory Road for housing. • Object to the inclusion of DDNP07 Land west of Gissing Road on the basis it will have an unacceptable impact on the character and appearance of the village and that land at Rectory Road could deliver 25 homes with lesser impact. • Recommendation that the extent of DDNP07 is reduced or deleted, and an allocation at be made in relation to the north-western section of Rectory Road. <p>This is what the SOA says about Rectory Road adjacent to ford and therefore the access road is subject to flooding; currently there is no pavement; access could be made but could be problematic as the site is located on a bend; ; policy 16 states that only very limited infill development or housing to provide for local needs is acceptable; If allocated, would therefore recommend at most allocating part of site for a smaller number of dwellings at north western end of site where adjacent to settlement,</p> <p>The SOA makes the same recommendation with respect to policy 16 and only allocating a small number of dwellings on the site and also about changing the character of the settlement. Also an issue of potential coalescence with Audley End.</p>	<p>It is down to the representatives on behalf of the community to take the decision on which site to allocate. This is a judgement based on engagement with the community, site assessment work (SOA) and the SEA.</p> <p>The SOA identifies similar constraints for land at Rectory Road as it does for land west of Gissing Road. In each case it refers to the potential for development to change the character of the settlement and extend it into the open countryside. Land at Rectory Road also has the added potential to increase coalescence between Burston and Audley End and the access road is subject to flooding and being situated on a bend, establishing a suitable access is a potential constraint.</p>
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Statutory Consultee	Key points	DDNP response
		Site selection is also based on SEA assessment of reasonable alternatives.

<p>Scott Properties</p>	<ul style="list-style-type: none"> • Promoting Parish Fields for the allocation of 24 single-storey properties designed for people aged 55 and over, including unlocking the private and currently inaccessible space for public use. This aligns with Policy 2 which identifies a need to provide housing for older people. The site was previously identified as a reasonable alternative in the GNLP. The Conservation Area Appraisal is supportive of public access to Parish Fields. Without a site allocation there is no incentive for the landowner to enable public access or repair the wall or railings on the Mount Street frontage. Partial development of the site could be controlled through a suitably worded policy within the DDNP. The current intention to designate Parish Fields as a LGS and non-designated heritage asset is not consistent with the aspiration to enable public use. • Suggests that DDNP does not include sufficient land to meet identified development needs: <ul style="list-style-type: none"> ○ DDNP01 is under the control of Scott Properties and although allocated for 200 dwellings, the site is only capable of accommodating c 180 dwellings. ○ DDNP03 is allocated at a density of 60dw /ha and there is no evidence to support this. ○ DIS1, DIS2, DIS3 and DIS6 together will contribute 92 homes and are carried forward from the SNLP2015. What evidence exists that these remain suitable, available and achievable given they have not come forward before now? ○ Delivery of DDNP03 is dependent on delivery of DIS7 which is the preferred site for the Diss Leisure Centre. The viability of this is questioned. ○ There is a lack of evidence in relation to the site selection and assessment process • The landowner of Parish Fields has not been contacted at an early stage in relation to LGS designation which is required. There is a lack of clarity when landowners were contacted in the DDNP or supporting evidence relating to LGS. • Parish Fields does not meet the LGS criteria: <ul style="list-style-type: none"> ○ It holds no recreational value. ○ Neighbouring uses – public car park, medical facilities, roads etc means it is not tranquil. 	<p>Decision to designate Parish Fields as an LGS and NDHA despite the objection. Evidence of how it meets the criteria for designation is given in the LGS & NDHA Assessment documents.</p> <p>DDNP is confident that it is meeting the housing requirement. This is outlined in Policy 1.</p> <p>All sites submitted as part of the plan making process have been subject an SOA and SEA assessment of reasonable alternatives.</p> <p>In relation to contacting the landowner about LGS designation, a letter was posted by Diss Town Council to the landowner 8 February 2021, prior to Regulation 14 consultation in June 2021.</p> <p>The LGS evidence base sets out how Parish Fields meets the criteria for designation.</p>
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Statutory Consultee	Key points	DDNP response
	<ul style="list-style-type: none"> ○ A Preliminary Ecological Appraisal they have undertaken does not support the site as an area which could be considered as rich in wildlife, instead confirms the site suitable for development. ○ The historic significance of the site is disputed, the site was twice assessed by Historic England upon receipt of applications to register it as a Historic Park and Garden, most recently August 2020, both applications were rejected. This was on the basis that the site lacked national significance and secondly because of a lack of design interest and lack of survival. ○ The site is located within the conservation area, which already affords it significant protection. ● The Supporting Views Evidence Report is incorrect in its description of Parish Fields, the site has not been used as a parkland since 1906 and was used as such for a relatively short period of time. ● Two key views of Parish Fields are identified in DDNP, there is a discrepancy in numbering of these views in the DDNP and the supporting evidence doc. View 12 in the evidence doc (11 in the DDNP) is entirely dependent on vegetation and maintenance of this, which is outside of the DDNP's control. ● The evidence for identification of NDHAs is insufficient and Parish Fields should be removed as a NHDA: <ul style="list-style-type: none"> ○ Whilst the assessment is based on the Historic England criteria the assessment for each site proposed is not been undertaken in sufficient detail, instead conducted as a tick box exercise without detailed commentary. ○ Parish fields does not fulfil the criteria for Historical Association (no evidence of this) or Community Value (given that it is not publicly accessible) ○ The consultation with Norfolk Historic Environment Service is not referred to in the Evidence Report 	<p>Conservation area status is not the same level of protection as Local Green Space designation.</p> <p>Numbering has been reviewed.</p>

<p>Strutt & Parker on behalf of Scott Properties Ltd</p>	<ul style="list-style-type: none"> • Policy DDNP01: Objection to the requirement for safeguarding a 1.2ha extension to the cemetery. 40 years of burials remain, so there is no additional need during the plan period and there is no strategic requirement to safeguard land for cemetery use. It is considered that the inclusion of land for an extension to the cemetery is based on future convenience rather than actual need. The need to identify land for market and affordable housing is more significantly acute and immediate. This element of DDNP01 is considered to be a strategic objective, and therefore not appropriate to be included within the neighbourhood plan. • Should a cemetery extension be justified, this should not be at nil cost to the Town Council. • Provision of 1.2ha would make it impossible for the site to deliver approximately 200 dwellings. • An area extending 0.7ha along the southern boundary of the site has been included in an illustrative masterplan as cemetery extension. This, taking into account root protection zones would allow for a 0.5ha extension which could provide c 1,125 burial plots. This would represent a proportionate and deliverable area of land which would be gifted to the town to be safeguarded as future burial space. • The sixth bullet of the policy requires the safeguarded land is used as informal recreation land until the point at which the cemetery extension is required. It would be unreasonable for the developer to retain and maintain this land if it isn't going to be available to new residents in perpetuity. Recommended arrangements are made as part of the S106 Agreement for the land to be fenced off and transferred to the Town Council prior to occupation of the first dwelling. The new owner should be responsible for maintenance. • DDNP01 boundaries should be amended to include GNLP0291, GNLP0342 and GNLP0250. GNLP0119 is no longer available. The boundary of GNLP0291 and GNLP0342 need amending slightly. This results in the site reducing to 8.4ha and Policy 1 should be amended accordingly. References to four sites should be amended to three sites. 	<p>The requirement for the cemetery extension has been reviewed and updated. This is identified in the supporting text rather than the policy.</p> <p>Amendments to the site details have been made as recommended and agreed between the agent/landowner and DDNP group.</p> <p>The public footpath data for the maps comes from Norfolk County Council, it is unclear why these are not showing on the maps if designated public rights of way.</p>
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Statutory Consultee	Key points	DDNP response
	<ul style="list-style-type: none"> • The site title should be amended to 'east of Shelfanger Road and west of Heywood Road to correctly describe its location. • Based on technical work and pre-application advice from South Norfolk Council the allocation should be amended to approximately 180 dwellings. • Highlighted that footpaths / right of ways FP7/FP26 and RB25 are missing off maps included within the plan. • Ecological Network basemap identifies the western parcel of the site to have a woodland, this is incorrect and should be amended. 	

<p>Suffolk County Council</p>	<ul style="list-style-type: none"> • Inconsistent numbers referenced in the document for the housing requirement. Clarity sought • Archaeology: welcomes the mention of historic assets. Suggested that reference is added to the Historic Environment Record maintained by SCC Archaeological Service which contains further information about the history of the parishes. Section 11/Policy 14 could encourage early consultation with SCC Archaeological Service for developing a planning application. DDNP11, 12 & 13 – Will require a condition to secure a programme of archaeological investigation given potential recorded in the HER for all three sites. Could be added to the policy and developers may wish to commission the evaluation before submitting a planning application to reduce unknowns. • Education: The new allocations in B&O are unlikely to have a significant impact on capacity at the catchment schools as they are under 10 dwellings. It should be noted that Local Plan growth has already been accounted for and both primary and secondary schools are forecast to exceed 95% capacity and two schools will need to expand to accommodate this. • Flooding: Recommend the following is added to DDNP11,12&13: ‘Give appropriate consideration to drainage and water management, with solutions appropriate to the low-lying nature of the site’. Community Policy 2 is welcomed, but it would be beneficial to reference SCC’s Riparian Ownership Guide and Working on a Watercourse. No mention of SuDS in the plan, should add a reference into Section 7, para 194 onwards acknowledging the links between SuDS and Green Corridors, biodiversity, green spaces, recreation and multifunctional benefits of them. Suggested that the following amendment is made to Policy 4 ‘h. housing developments that do not result in water run-off that would add to or create surface water flooding, shall include the use of above ground open Sustainable Drainage Systems’. • Health & Wellbeing: suggest the plan includes the desire for smaller homes that are adaptable and accessible, which meets the requirements of older residents and younger people and families. The following wording is recommended for Policy 2: ‘support will be given for smaller 2 and 3 bedroomed homes that are adaptable (meaning built to optional M4(2) standards), to meet the needs of the ageing 	<p>Housing requirement numbers have been checked and updated.</p> <p>Requirements for an archaeological investigation have been added to appropriate policies.</p> <p>Capacity forecast detailed in the supporting text.</p> <p>Added a new flood section which SCC has reviewed. Specific text for the B&O sites not required as this is reflected in surface water management policy.</p> <p>Added to surface water management policy.</p> <p>Suggested policy wording with respect to smaller homes added to the Design policy.</p> <p>Amendments to the Green Corridors and Biodiversity</p>
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	<p>population, without excluding the needs of the younger buyers and families’. Suggested there could be further consideration for the needs of residents living with dementia in the community, and the potential to make some parishes more dementia friendly. RTPI has guidance on Town Planning and Dementia. Para 207 could be expanded to include ‘improving the mental and physical health and wellbeing of local people’. Recommend inclusion of the need to make green spaces and facilities accessible to residents with limited mobility (inclusion of benches and well-maintained paths etc), into Policy 12.</p> <ul style="list-style-type: none"> • Minerals & Waste: No concerns regarding the proposals in DDNP • Natural Environment: Recommended that Policy 5 (green corridors) is renamed to ‘Green Corridors and Biodiversity Enhancement’. Amendment to second and final para of Policy 5 suggested. <ul style="list-style-type: none"> “New development proposals must recognise the identified green corridors (shown in Figure 6) Proposals for new development within or adjacent to a green corridor will be resisted unless they are able to demonstrate how they <i>must</i> deliver <i>measurable</i> appropriate net gains in biodiversity or qualitative improvement to the corridor. This should relate to quality of habitat or its ability to facilitate movement of fauna or flora.” “All developments in the plan area must maximise habitat opportunities, making provision for local wildlife (e.g. incorporation of bird boxes, swift bricks and bat boxes into structures etc.) and promoting the freedom of movement of wildlife through development sites (e.g. incorporating hedgehog highways between gardens etc.). <i>Existing natural features of a site should be retained. These include existing hedgerows, trees, water courses and water bodies.</i>” <p>Para 276 and Section 2 of the LGS Assessment misses an ‘and’ from the end of the second bullet point. Policy 13 supported.</p> <ul style="list-style-type: none"> • Public Rights of Way: Section 7.2 could reference The Angles Way, a long distance trail between Gt Yarmouth and Thetford, which passes through and links a number of natural attractions (incl Roydon Fen) with Diss and in the surrounding parishes. Suggested that Policy 12 could be expanded: 	<p>policy made as recommended.</p> <p>LGS policy updated to better conform with the NPPF. Linkages are no longer included in the policy as a result.</p> <p>Added reference to other strategies in the supporting text as recommended.</p> <p>Wording with respect to secure and safe cycle storage added to the Design Policy.</p> <p>DDNP now includes policy maps for each parish.</p>
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Statutory Consultee	Key points	DDNP response
	<p>“Opportunities to create linkages between Local Green Space, for example through the creation of new, <i>and improvement of existing</i>, rights of way, may be considered favourable where it creates a network of green spaces or ecological corridor. Where <i>sites contain or are adjacent to Public Rights of Way</i>, development should ensure these are retained and enhanced.”</p> <p>There could be reference to other strategies that support DDNP – SCC Green Access Strategy which sets out SCC’s commitment to enhancing PROW, including new linkages and upgrading routes. There is support for planning policies which seek to improve access to the countryside and PROW.</p> <ul style="list-style-type: none"> • Transport: DDNP12 & 13 are remote from the village footway network and may require provision of a new footway connection approx. 100m in length. Community Policy 3 supported. Policy 6 is supported but very Diss centric. Reference to cycle storage in Policy 7 is welcomed. Suggested that the following is added to Policy 4 (design) ‘proposals should include provision for safe and secure cycle storage, in accordance with adopted cycle parking standards’. • General: Recommended policy maps are added. The numbering of the policies is confusing, with the site allocations being different – more logical to have Policy 1 then Policy 1a etc. Recommend community policies are amended to community actions. Recommended amendment to Policy 4 ‘high quality design is can be demonstrated defined by’. Typo p63, should be community policy 4 instead of 3. Plan should be updated to take into account the updated NPPF. 	

Statutory Consultee	Key points	DDNP response
Suffolk Wildlife Trust	<ul style="list-style-type: none"> • No specific policy relating to biodiversity and BNG, recommend additional policy. New policy should reference safeguarding protected species as well as priority species from future development. New policy should state that development will be resisted where it impacts upon CWS. • Add reference to BNG in the Green Corridors policy. 	<p>This is reflected in Policy 8 on Green Corridors and Biodiversity Enhancement. The NPPF already identifies that all new development should protect and enhance biodiversity, including to promote the conservation, restoration and enhancement of priority habitats, ecological networks and protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains in biodiversity. There is also reference in the NPPF to locally designated sites which covers CWS.</p>

Statutory Consultee	Key points	DDNP response
UK power networks	<ul style="list-style-type: none"> Any new development can apply to connect to the local distribution electricity network. If the electricity network is required to be upgraded to facilitate new electricity demand, under Ofgem’s regulations the developer may be required to pay towards the necessary upgrade costs. We would encourage any developer to engage with us with as early as possible to assess any potential impact on the electricity network from their proposed development. We would like to specifically comment on the proposal for development at sites Dis 2,6 and 7, as these sites are located directly next to a major electricity substation. As such major electricity equipment emits a low frequency hum, any development should ensure measures are in place to mitigate against this noise for future residential occupants. We would strongly recommend that in any future planning applications the local planning authority consults with us to discuss noise mitigation measures for the developer to install by condition, before planning permission is granted.” 	Added reference to mitigating noise impact for the allocation south of Park Road
Waveney, Lower Yare and Lothingland Drainage Board	<ul style="list-style-type: none"> Support community policy 2 relating to management of drainage ditches. Recommend reference to government guidance. Particular reference to DIS2, DIS6, DIS7, DIS9 DDNP04, DDNP05 and DDNP12 all within the IDB boundary. Points made re surface water drainage. 	<p>Included reference to guidance in supporting text within the new flood and water management section.</p> <p>Text included within the flood and water management section outlining that a number of allocations fall within the IDD and that consent will be required.</p>

Statutory Consultee	Key points	DDNP response
<p>Williams Gallagher (representing the landowners of DIS1 and DIS3)</p>	<ul style="list-style-type: none"> • DIS1 should allow for access to be taken from Vince’s Road or Prince William Way to ensure flexibility in the access strategy. • The cascade system for affordable housing nominations will need to be assessed with the housing officer at South Norfolk Council to determine if it is suitable and allows sufficient flexibility • Criteria d) of Policy 4 must recognise there are specific highways requirements to allow roads to be adopted. • Policy should be clarified to state that allocations such as DIS1 and DIS3 can come forward in advance of significant network improvements. If it is demonstrated that contributions need to be secured to support highway works then these should be part of a pooled pot or via CIL. • Policy 10 should be clear that where infrastructure by statutory providers is required it does not delay delivery of housing schemes. 	<p>It is not appropriate for the access to be from Vince’s Road given the additional pressure this would add to the junction with Victoria Road. This has been explained in the supporting text.</p> <p>The cascade system was identified working with the housing officer at SNC.</p> <p>It is recognised that there are highways requirements to allow adoption of roads.</p> <p>We have amended the infrastructure policy to reflect the cumulative impacts of growth.</p>

Summary of feedback from residents

Summary of comments on the Growth and Housing Policies

1. The level of growth is seen by many as too high.

There are quite a lot of comments specifically about the level of growth being delivered. Diss was felt to have accommodated its fair share of housing growth over the last 5 years and some respondents felt passionately about it not increasing in size any further. There is particular concern about Diss losing its uniqueness or small heritage market town feel. Some respondents referenced climate change and the principle of house building being at odds with the climate emergency. There was a lack of understanding about why so many new homes are coming forward as part of the DDNP – to quote one comment ‘why are 745 dwellings going to be built when the minimum requirement stated is almost 300 less’. A few respondents indicated that they support the level of growth, including one who commented that they are actively looking to buy/rent in the Diss area and finding it difficult.

DDNP has to deliver the indicative housing requirement set out by the district council as a minimum. If DDNP didn't deliver this growth it would be delivered by the local plan. DDNP is an opportunity for the community to influence where it goes and how it comes forward. We have clarified and made this position including the housing numbers clearer.

2. Many comments relate to the growth strategy.

There is a general lack of support for house building on green open space or land currently in agricultural use. Some respondents said that the strategy should be to concentrate all new homes in Diss and not the surrounding villages. The opposite view was also voiced with some people indicating that there was additional housing need in Roydon and Palgrave which is not being met in the DDNP. There was objection to housing being built in Roydon parish counting towards meeting the Diss housing requirement. There is divided opinion on whether growth should be concentrated in the town or on the outskirts, with some respondents indicating that the town centre should be the location for services not housing. Some respondents are not in favour of the allocations near to the River Waveney due to potential flood risk and impact on river quality. The risk of flooding is seen to be increasing due to climate change and there is concern about any impact on existing property, some of which flooded in December 2020. A few respondents specifically objected because they will be located near to new development, which will affect their quality of life or impact on the perceived value of their home. There are a few comments in support of the growth strategy, with one recognising that growth in principle is unpopular, but the spatial strategy seems to be as fair and equitable as possible. Others reference the need to balance the necessary housing development with the protection of green space and leisure facilities.

Where possible the strategy has been to develop previously developed land / brownfield or land within the built-up area but this on its own is insufficient to deliver the housing requirement, whilst protecting important green spaces and the heritage. The distribution is part of the housing requirement, there is a set requirement to deliver 25 new homes in each of the South Norfolk villages for example. The distribution of growth is a strategic policy from the district council and DDNP has needed to work within this framework.

The urban area of Diss has encroached into Roydon parish and whilst we ensure that Roydon village doesn't contribute towards the Diss housing needs, it's inevitable that the growth of Diss town will rely in part on land within Roydon parish. This is also part of the strategic approach, whereby part of Roydon is included within Diss settlement.

The changing nature of town centres means that housing will become part of the mix of land use over time. We have kept this to a minimum by just allocating the old infant school in the town centre, which has remained empty for many years.

The allocations near to the River Waveney will need to take account of flood risk and surface water run-off, they will be required to manage their own flood risk, in accordance with national policy. The level of housing is limited on these sites to take account of their nature and situation next to the Waveney.

3. Inadequate infrastructure is the top issue for respondents who disagree with the housing policies.

Infrastructure is already considered by many respondents as inadequate or in need of investment, and this is expected to worsen because of the proposed level/location of growth. Specific reference is made to medical facilities already being overstretched, bus services not being adequate, lack of parking in Diss town centre, lack of activities for older people or children, shops in the town centre closing, schools being over capacity, the sewage system not coping, updates being required to the high school and the need for more footpaths. Various impacts of infrastructure not keeping pace with development were given with the main concern being that a lack of infrastructure locally will cause more people to drive elsewhere, having a negative environmental or traffic-related impact. A few respondents asked for more infrastructure requirements to be included in the allocation policies.

New housing will result in infrastructure improvements. Each site will deliver some infrastructure improvements, such as access, sewage, walking and cycling. Larger scale or cumulative infrastructure needs can be partly met through CIL. New residents will support the viability of existing facilities such as shops. But housing will not address all existing infrastructure issues and some infrastructure requirements are strategic and need to be met through external bodies such as the Integrated Care System.

Additional text has been added to clarify the role of the Neighbourhood Plan and strategic providers in the delivery of infrastructure improvements.

4. Respondents feel there is a lack of connection between the housing plan and traffic management plan.

Traffic levels in the town and congestion on Victoria Road are an issue now and will be worsened through development, especially that proposed north of the cemetery. A few respondents feel Diss should have a bypass. Questions were raised about the benefits of the new link road and whether it will be able to cope with the extra traffic and all the additional houses. There is concern about additional traffic pressure on routes through Diss adding to the number of people using the backroads through surrounding villages.

We have consulted the Highway Authority as part of the plan making process and they have not raised any issues about undue traffic impacts of the proposed development. There is a network management plan which we have drawn on. Each development will be required to mitigate its own highway impacts and the Highway Authority will have a responsibility to ensure this happens. Cumulative impacts of growth and major infrastructure improvements will be delivered through CIL and other external monies, led by the Highway Authority. This plan helps to set the priorities and guide this investment.

There is also direction in DDNP about rural routes and traffic calming.

5. There is significant support for high quality design and some respondents felt there should be more emphasis on this.

There is strong feeling that recent development in Diss lacks good design and is out of character with existing buildings and there is support for policy that ensures the design of future development will be better. There is concern about the practice of some householders and their ability to amend the design following planning consent. Some comments supported sustainable design principles for new development contained in the design policy but questioned whether this could be extended to existing properties, to influence retrofitting to make them more sustainable / energy efficient. On sustainable building practices, some respondents commented that there should be more on this in response to climate change. An inconsistency in language in the Design policy and supporting text was identified by one respondent who also had detailed comments about the Design Codes developed by AECOM. One respondent asked if the design policy could specify minimum sizes for rooms in new homes. A few respondents commented on lighting. There was a request for more control on external lighting once a property has been purchased, to ensure the dark skies policy can be achieved in rural villages. There was also caution from one respondent that the approach to street lighting in Diss affects the night sky in surrounding villages.

This is why there is a DDNP policy on design and there is a design guide. This is concerned with future development, retrofitting existing properties is dealt with under permitted development rights. A lot of sustainable building practices is dealt with under building regulations rather than planning policy. There is also something in the revised NPPF (July 2021) on high sustainability standards which is reflected in the DDNP.

Regarding the Design Codes, AECOM produced these according to a standard methodology. AECOM have since revised the Design Codes document to incorporate the detailed feedback received in relation to this.

Policy is not able to specify minimum sizes for rooms, there are nationally prescribed space standards, which is already a material consideration.

It is not possible to control external lighting once a property has been purchased.

6. There is significant support for affordable housing.

Some respondents said there needs to be more emphasis in the DDNP on supporting younger local people to get on the housing ladder and there was disappointment that not more of the planned homes will be affordable. Dedicated affordable housing development was supported. There is general support for the affordable housing cascade policy, but questions about whether there can be any further local policy on affordable housing that can be added to DDNP.

The level of affordable housing is a strategic policy in the local plan – requiring affordable housing to be delivered on all sites for 5 or more dwellings (or 0.2ha or more). Our policy aims to influence the type of affordable housing coming forward. There will be a national requirement for 25% of affordable homes to be First Homes, mostly for younger people aiming to get on the housing ladder, this has been added to the supporting text.

7. The density of new development seems high to people:

There is some concern about housing density being too high, especially on sites that are edge of settlement. Within the town there was also concern that very high-density development will be out of character and car parking will be an issue.

It is national policy to make efficient use of land. Lower density would result in the loss of more green space, so there is a balance to be had here. 25dw /ha is typical for edge of settlement or village development.

8. A few responses relate to housing type / size.

There is support for more specific reference to self-builds as these are seen to enhance variety and can be built quickly. More smaller homes are seen to be a good thing. There is concern about the use of 'viability' in the Housing Mix policy as they is considered to be a get out clause for developers. There are mixed views on whether there should be more or less homes for older people, including supported housing and care homes.

The Housing Mix Policy includes a requirement for self-build plots to be included in all major development, 10 homes or more. It important for schemes to be viable, there is a national method for looking at viability, which would need to be used to demonstrate a particular housing mix is not viable. The policy reflects the evidence in the Housing Needs Assessment. There are already a lot of smaller homes in the DDNP area which would allow people to downsize but there may be a need for more supported accommodation.

9. The allocation north of the cemetery in Diss (DDNP01) is the site with the most individual comments of objection.

Of those commenting on this site specifically, the main concerns relate to the principle of building 200 new homes on agricultural land on the edge of Diss, some distance from local services, and the impact this will have on traffic. In terms of local services, there are very few shops and amenities nearby, making it an unsustainable and car dependent development. Some respondents queried whether the policy could include the requirement for local infrastructure, such as a shop or green open space. There is a lack of confidence in the new link road alleviating traffic pressure, with views that the development will result in more people entering the town via narrow roads like Mount Street and Sunnyside, which are difficult to navigate, or leading to further traffic on country roads leading to Walcot Green and the Rail Station. There is some concern that the adjacent burial ground will be impacted, with some respondents indicating that they object to the burial ground being built on.

The principle, ie the housing requirement, is set by the Local Planning Authority. We have tried to accommodate as much as possible within the town or on previously developed land, but it is not possible to accommodate all in this way. The number on the site has been reduced to 180. There will be green open space delivered as part of the development, and some land gifted for the cemetery which can be used for recreation in the short term, and walking and cycle links. The existing Burial Ground should not be impacted as additional land adjacent the development will be safeguarded. The Highway Authority has not raised concerns and feel that the link road will be sufficient.

Other allocation specific comments were made about Land west of Gissing Road, Burston; Rose Farm, Scole; the former infant school, land south of Roydon primary school and land behind Thatchers Needle, Diss.

- **Land west of Gissing Road, Burston:** The proposed scale of development in Burston was seen to be out of proportion with the size of the village and it was perceived to have a negative environmental impact including that on nearby listed buildings. Flooding is an issue in Burston and there were concerns that this would be worsened by the development. A further comment was made about necessary infrastructure not being available in the village

to support a development of 25 homes, including highway infrastructure. *Requirement to deliver a minimum of 25 dwellings is set by the Local Planning Authority. The AECOM SOA assessed a range of constraints, including flood risk and heritage impact, but this will be looked at in more detail at the planning application stage. Flood risk will be dealt with as part of scheme design. The point about infrastructure is addressed above.*

- **Rose Farm, Scole:** Respondents were concerned about road safety, with speeding already an issue on Bungay Road, which is often used as a rat run between the A143 and A140. There is also concern about surface water flood risk, with the development considered likely to increase water pooling across the road by the Gables then running downhill towards existing homes. *Rose farm has been removed as an allocation in the DDNP.*
- **Former infant school, Diss:** There was support for bringing this back into use, though disappointment that it wasn't going to be used for a community facility, healthcare or council offices. Design and is considered particularly important for this site given its heritage and there was a request for this and emphasis on retaining the character of the building to be strengthened in policy. A question was asked about how access and parking will be achieved and the likely impact this will have on surrounding land use. *The design aspect has been strengthened within the policy. There is no prospect of the building being used for a community facility. Access and parking will be considered as part of the detailed design and layout.*
- **South of Roydon Primary School:** Some people indicated they felt this reduced the strategic gap between Roydon and Diss, therefore conflicting with Policy 11. There were views that allocating all 25 homes on one site would create an excessively urbanised estate and it would be a better strategy to allocate a small number of homes on a few sites. *The Strategic Gap Policy excludes the site allocation and there will be a belt of trees planted on the eastern boundary which offers screening and reduces the visual impact of the development. Other sites were considered as part of the Plan's development, but were not feasible for providing the full 25 dwelling requirement.*
- **Land behind Thatchers Needle:** A couple of comments were received relating to this being a better location for housing and there not being demand for a new hotel. There is also concern about this being located close to the river, with implications for future flood risk and potential for river pollution. *This site has been removed as an allocation in the plan as it has since received planning permission.*

10. Some respondents referred to matters outside of the DDNP's control or proposals not being made in the DDNP.

Examples include reference to South Norfolk Council's planning department and decisions they make in relation to planning applications; proposed development on Parish Fields; and sites identified within the VCHAP consultation for Scole which are not taken forward in the DDNP.

Summary of infrastructure comments

11. There is a general feeling that infrastructure is currently inadequate or at capacity and that DDNP does not address this.

This includes the ask that there are more detailed requirements for infrastructure improvements in the allocation policies, or a 17-year infrastructure plan that accompanies the growth strategy. There were a few comments on policy 10, including a request to include the Corn Hall and traffic management improvements within the list of priorities, and a request that requirements from statutory providers are referenced, in particular in relation to not holding up housing delivery schemes. *Additional text has been included in the plan to provide clarity on the influence DDNP has*

on infrastructure improvements, including strategic infrastructure such as healthcare. All suggestions for improvements have been reviewed. Policy 13 relates specifically to the funding and delivery of infrastructure and identifies local priorities for Community Infrastructure Funding.

12. There is support for relocating and improving the leisure centre and regeneration of the Waveney Quarter.

A request was made for the new leisure centre to be disabled friendly, with disabled people involved in the design of new facilities. *There are national requirements with respect to public facilities being DDA compliant.*

13. Broadband availability is a concern for a few.

Suggestions were made that more should be done to enhance the status of B4RN and policy should cover all new properties having broadband connectivity. *Additional text has been added in relation to Broadband improvements, including reference to B4RN and where this has been delivered in the DDNP area. Policy 12 requires developers to ensure broadband infrastructure is provided for new developments.*

14. There is strong support for improved walking and cycling links, with many indicating that this should be a key priority.

There were a few detailed comments about the proposed network in relation to: the link from Palgrave – Victoria Road; link to Scole; measures at Morrison’s roundabout; and crossing on the A140 from the Old Bury Road. There were general comments about the need for more footpaths in Brome & Oakley and safe walking routes in Stuston. *Detailed suggestions considered. Additional text added into Policy 10 setting out that the delivery of safe off-road walking/cycle improvements as part of development proposals will be considered a benefit.*

15. There’s strong support for the introduction of green corridors and other measures to protect wildlife.

A few comments were received in relation to the location of individual corridors, including a request that the corridor from the Mere up to the Cemetery in Diss is extended into the proposed new development, to support mitigation of any impacts. There was a request for Fair Green to be included within a corridor. Some respondents felt there should be more green corridors, others were concerned that corridors would run over people’s private land. In relation to Policy 5 there was a suggestion that no new garden fences should be provided without leaving a gap for hedgehogs to move between gardens.

Each of the Green Corridors are strategic in nature and indicative at this point. Work to identify exact routes and improve biodiversity / habitat will take place with local landowners. Even if corridors do run into private land, it doesn’t impose any requirement on the landowner beyond the planning system. Policy 8 on Green Corridors and Biodiversity Enhancement promotes freedom of movement for wildlife through development sites and specifically references hedgehog highways.

16. Questions were asked about why there is no mention of medical infrastructure in the plan.

Many respondents would like to see an expansion of NHS services. *The local council would have identified the need for strategic infrastructure such as medical facilities in their growth infrastructure strategies. This wasn’t identified for Diss. Added a new paragraph explaining this within the DDNP.*

17. There were a few comments about car parking.

There was a request for a parking policy for new development, to include EV charging points and the number of car parking spaces to be provided. A detailed point was made about DDNP06, requesting improved parking for Roydon Primary School. A suggestion was made that parking should be banned in the Market Place in Diss, 1hr free parking provided and there should be additional parking at the rail station. *Parking standards for new developments are already set by the Highway Authority, when developing DDNP there was no evidence that requirements in the DDNP area should be different from those already in place. The requirement for EV charging points is now required through building regulations. The allocation policy for the site south of Roydon Primary School requires that appropriate highway access is created onto Old High Road, taking into account the close proximity to school traffic, the development will not however include additional provision for parking for the school. The point about car parking in Diss is not a Neighbourhood Plan issue.*

18. There is a lot of concern about the traffic impacts of new development.

Many respondents felt that the plan underplayed the level of current congestion and that the measures identified to provide additional capacity within the network were inadequate. Detailed comments were provided about the Diss Network Improvement Strategy and in relation to issues at Morrison's roundabout, Mount Street and Sunnyside. A bypass was requested. There were a few comments about the traffic section being Diss centric, and not addressing the impact of traffic in Roydon on the A1066 which is also an issue. A detailed point was made about development at DIS1 and DIS3 coming forward in advance of significant network improvements, the need for which may hamper development. There was concern about the proposed link road north of the Cemetery and the impact this will have on traffic using other routes through the town. There were a few comments about a lack of 30mph signs in Diss. *South Norfolk Council will have looked at the scale and location of growth and the impacts on traffic and whether strategic infrastructure such as a bypass is required. The Network Improvement Strategy did not identify a requirement for a bypass and that considered the delivery of 2,000 homes around Diss. The Highway Authority provided comments on the allocations and didn't identify the requirement to deliver any further strategic infrastructure improvements.*

[Summary of comments related to Protection Policies](#)

There is strong support for protecting as much green space as possible, protecting the rural feel and allowing space for nature. Some comments related to there being less housing growth and more focus on maintaining / improving what we've already got.

19. Designation of Local Green Spaces is seen to be a good thing.

Questions were asked in relation to the landowner's responsibility and whether designated LGS would be opened to the public. There is significant support for inclusion of Parish Fields, other LGS mentioned specifically included Quaker Wood, Louis's Lane Allotments and Frenze Beck. Additional green spaces were suggested for designation, including Brewers Green, Roydon Fen, Chapels at the Cemetery, Fair Green and play spaces. A request was made for Quaker Wood to be extended to create a community woodland. *LGS designation doesn't require any responsibility on the landowner to allow public access. Many more green spaces were considered when developing DDNP, but they failed to meet the national criteria for designation.*

20. Concern was raised about the designation of churches / churchyards as LGS.

It was suggested that this would obstruct the proper function and amenity of the church or prevent churches from developing overtime to provide facilities such as toilets or parking. A suggestion was made that should churches remain then they be exempt from the land replacement requirement in

Policy 12. *Amended the Local Green Space Policy so that development which supports or enhances the current function of the spaces is allowed. The requirement to deliver replacement land of equal value has been removed from the policy.*

21. Protection of key viewpoints was supported.

Some felt protection should be extended to more views including the Mere and view of the church, view of the southern side of the Waveney Valley, the view up towards the village in Palgrave, view from the Old Bury Road towards the church in Palgrave, view from the old Post Office towards Denmark Bridge. There were a few detailed comments about the views identified. A suggestion was put forward that public benches should be erected at the key viewpoints, and this could be included as a community action. *Many potential views were considered for identification in DDNP, those included were considered to be the most special and received greatest support at public consultation. Policy 13 sets out priorities for Community Infrastructure Funding, actions such as erection of benches could fall within the priorities identified.*

22. There is support for the identification of non-designated heritage assets.

The Old Infant School in Diss was put forward by several respondents as another NDHA. There was some confusion about the process that had been followed to identify NDHAs and how some assets which were consulted upon were not included. Some concern was raised about the implications for owners of the buildings identified. *A range of potential NDHAs were considered, with those meeting criteria set out by Historic England identified within DDNP. The principle of identifying NDHAs is to protect those heritage assets for future public benefit and in doing so there may be additional restrictions in relation to planning applications.*

There is support for a strategic gap between Roydon and Diss, but questions raised by a few about whether other gaps can also be protected, including between Diss and Palgrave and Diss and Scole. Some respondents felt that Policy 13 was compromised by the allocation of DDNP06 and others made a case for the gap being extended further northwards. *It is more difficult to justify identification of other strategic gaps. DDNP06 is not within the strategic gap.*

Second Regulation 14 Consultation on Major Modifications to the Plan

Following on from the first Regulation 14 consultation exercise and new information now available, it was decided that a second, more focussed consultation was required. This was called the 'Major Modifications' Regulation 14 consultation.

An identical approach to that adopted in the first consultation (see above) was taken, with the consultation being online, and promoted via banners, posters, Facebook posts and local parish displays. A booklet and accompanying summary was produced giving specific information on the major modifications.

The same group of consultees were contacted for a second time, and where specific individuals had replied on behalf of an organisation, they were directly contacted. We were also now in a position to also contact specific individuals who had taken part in the first consultation and had consented to us using their data to contact them again. This comprised 115 individuals.



Diss and District Neighbourhood Plan
'Major Modifications' Reg 14 Consultation
is NOW OPEN!

www.ddnp.info

There have been some significant changes to some key policy areas of the draft DDNP, including scale and location of housing growth, surface water and flood management and Local Green Spaces. Go online to read more and comment on these modifications prior to the Plan's submission.

Printed copies of the Major Modifications Consultation Document are available, please contact your local Parish Council to request a copy.

This consultation will close May 5th 2022

Image 1 Banners were utilised to promote the 'Major Modifications' Reg 14 consultation

Responses received from Stakeholders

Stakeholder	Summary of Key Points Raised	DDNP Response
Natural England	No comments	
Williams Gallagher on behalf of Inside Land Group	<ol style="list-style-type: none"> <li data-bbox="495 288 1279 863">1. Objection in relation to the proposed deletion of the allocation of Land at Vince’s Road, Diss (formerly DIS1) for residential development. The client will be submitting a planning application for development of 39 affordable homes on the site. The site remains fully capable of and is appropriate for development and is deliverable within the original local plan timeframe – which runs to 2026. Requested that the deletion of the site as an allocation is reversed. Unless there are justifiable and evidenced reasons to the contrary, it is considered that sites currently allocated for development in extant local plans should be carried forward as a first priority. This site was rated ‘green’ in the DDNP SOA, which compares to ‘amber’ of the new site allocated in Scole which is a lower order settlement. <li data-bbox="495 874 1279 1289">2. Objection in relation to the proposed reduction in the number of dwellings allocated at Land off Denmark Land, Diss (DDNP6, formerly DIS3). The site is one of several draft allocations proposed to have their capacity reduced, at the same time a new housing allocation is introduced in Scole. Unless there are justifiable and evidential reasons to the contrary sites currently allocated for development in extant local plans should be carried forward as a first priority. A new/larger site is being allocated in Scole which is a lower order settlement than Diss. 	<p data-bbox="1305 288 2020 472">DIS1 has been reinstated in the plan, as allocation DDNP7. Based on evidence in the SOA the allocation is for 10 dwellings, rather than 35 as previously allocated under the SNLP. Clear reasoning is set out in the DDNP for this.</p> <p data-bbox="1305 520 2036 863">This site is being carried forward within the DDNP. The context for its allocation has changed however, as the site lies directly adjacent the strategic gap between Roydon and Diss, which should be characterised by openness, and growth is being concentrated elsewhere within Diss, including on Brownfield sites. The allocation in Scole has no bearing on allocations in Diss as each settlement received its own indicative housing requirement.</p>

Stakeholder	Summary of Key Points Raised	DDNP Response
Suffolk County Council	<ul style="list-style-type: none"> • We have amended our records to include the modifications to the housing numbers in the Suffolk parishes, which will likely lead to a reduction in anticipated children arising from development. Both the primary and secondary schools are forecast to exceed 95% capacity and the strategy for managing this is via future expansion of existing provision. • Recommended that the final sentence of Policy 7 (Surface Water Management) is removed as it applies to housing development that does not cause an increase in surface water runoff. • The supporting text for Policy 15 (Local Green Space) is thorough and welcomed. It is suggested that the protected LGS are listed in the policy, with an indication of which parish they fall into. Suggested that the text between the first and final para are deleted as this duplicated NPPF. 	<p>DDNP Response</p> <p>Noted, thank you.</p> <p>Removed as suggested</p> <p>Decision not to list all LGS, these are clearly identified in the maps which are referred to in the policy.</p> <p>The exceptions are subtly different from the NPPF policy on Green Belt.</p>

Stakeholder	Summary of Key Points Raised	DDNP Response
<p>Norfolk County Council</p>	<p>Lead Local Flood Authority</p> <ul style="list-style-type: none"> • Welcome that majority of comments provided at initial Reg 14 have been taken on board. • Advise specific reference to NCC planning guidance • Update evidence with respect to records of internal and external flooding • Recommend removal of references within policies to sites requiring to submit details to the LLFA • Recommend inclusion of Environment Agency maps <p>Minerals and Waste</p> <ul style="list-style-type: none"> • Additional text is required in Policy 2 to state 'Norfolk minerals and Waste Core Strategy Policy 16 (or any successor policy) applies, as this site is underlain by safeguarded mineral resources. <p>Transport</p> <ul style="list-style-type: none"> • Object to proposed allocation DDNP2 as it is not clear how the site would be safely accessed from the highway. The site is therefore unlikely to be deliverably. 	<p>Reference added to guidance provided by LLFA and evidence in relation to flooding events has been updated.</p> <p>References within the allocation policy have been removed.</p> <p>Decision not to include the Environment Agency maps these are a snap shot in time and will become out of date.</p> <p>The requirement for safeguarding of minerals and waste is referenced in the site-specific allocation policies for DDNP14 and DDNP15, but have added it into Policy 2 also.</p> <p>We have worked with the agent for DDNP2 to determine a solution that would allow for adequate access. This involves a reconfiguration of the car park, subject to South Norfolk Council's approval. This would need to be demonstrated at the planning application stage. We are particularly keen to include this allocation within the plan as it is brownfield, with the old school having sat empty and in a poor state for a long time. Improvement in this area is needed, and this is an opportunity for the building, which is an important heritage asset to come back into use.</p>

Stakeholder	Summary of Key Points Raised	DDNP Response
Gladman Developments Ltd	<ul style="list-style-type: none"> • Do not consider the suite of SEA documents present a robust assessment as includes no comparative assessment against the baseline or against other development options. This should be rectified. • It may be necessary for Diss to accommodate further growth and land south of Burston Road is suitable for this. Gladman are open to discussions about the scale of land being promoted at land south of Burston Road and the community benefits the site could deliver. Suitable vehicle access can be taken off Burston Road with pedestrian access from the south to encourage trips into the center without private car. The proximity to Diss High School is a significant positive. 	<p>The SEA is sufficiently robust to meet the requirements.</p> <p>DDNP is meeting the indicative housing target for Diss.</p>
Hopkins Homes	<ul style="list-style-type: none"> • Confirm the site is deliverable and available. 	Noted, thank you
Savills on behalf of the Norwich Diocesan Board of Finance	<ul style="list-style-type: none"> • It is not clear that representations provided at the first Regulation 14 have been considered. 	Our consideration of all the representations received is within this Consultation Statement

Stakeholder	Summary of Key Points Raised	DDNP Response
<p>Strutt & Parker on behalf of M Scott Properties Ltd</p>	<p>In relation to Policy 15</p> <ul style="list-style-type: none"> • Previous representations objected to the removal of Parish Fields as a Local Green Space, which has not been reflected in the Major Modifications consultation. The site continues to be promoted for residential-led development specifically designed for those aged 55 and over. This proposal would unlock a private and currently inaccessible area for public use. • The representation seeks the inclusion of Parish Fields as a new additional residential allocation under Policy 1 to meet the housing needs of the elderly and those with disabilities. This would include public open space. • The housing numbers should not be considered a target but a minimum level to be delivered. Opportunities to increase supply of housing should be welcomed, especially in sustainable locations. It is noted that an additional 50 units are being allocated in Scole, which is a less sustainable location than Diss. • Parish Fields should be removed as a Local Green Space from Policy 15. Designation must not be used as a way that undermines planning for sustainable development. • The justification for the differences between Green Belt and LGS is not robust enough to determine a deviation from national green belt policy. 	<p>There is strong community support for designating Parish Fields as a local green space, this is detailed within the DDNP Local Green Space Assessment document. There is a lack of public support for development on this site.</p> <p>It is accepted that Diss is a sustainable location for growth. However, in relation to the spatial strategy, indicative housing requirements have been considered on a settlement by settlement basis, rather than across the DDNP as a whole. This was the requirement of the local authority, therefore the allocation in Scole, was to meet the indicative requirement for Scole, which would stand regardless.</p> <p>With respect to the justification for differences between Green Belt and LGS, this will be for the Examiner to consider.</p>

Stakeholder	Summary of Key Points Raised	DDNP Response
Strutt & Parker on behalf of M Scott Properties Ltd	<p>In relation to DDNP1: Land east of Shelfanger Road and west of Heywood Road</p> <ul style="list-style-type: none"> • With reference to the representation made at Regulation 14 – the requirement to safeguard, at nil cost to the Town Council, a 1.2ha extension to the Cemetery – should be removed. • The approximate site area and number of dwellings more closely reflects the extent of the site and upper limit of 179 – ref application 2021/2782. Other corrections supported. 	<p>Reference to safeguarding the cemetery has been removed, see response to earlier representation at Regulation 14 for further details.</p> <p>Thank you.</p>
Avison Young on behalf of National Grid	<ul style="list-style-type: none"> • No assets are currently affected by proposed allocations within the NP area. 	<p>Noted thank you</p>

Stakeholder	Summary of Key Points Raised	DDNP Response
Waveney, Lower Yare and Lothingland Drainage Board	<ul style="list-style-type: none"> • Allocations DDNP10, DDNP3, DDNP4 and DDNP5 are within the IDBs Watershed Catchment. If surface water from these new developments is to be disposed of via infiltration we would recommend the proposed strategy is supported by ground investigation to determine infiltration potential of the site and depth to groundwater. If infiltration is not viable and surface water discharge is proposed to a watercourse it is requested that this is in line with SuDS. • Sites DDNP14 and DDNP15 are within the IDB. Therefore, the Board's Byelaws apply. • Should any development take place within the Diss Business Park then the Board's Byelaws will apply • Strongly support the introduction of Surface Water Management policy. We would advise infiltration testing in line with BRE Digest 365 (or equivalent) is undertaken. For developments where SuDS methods are not viable and discharge is proposed to a watercourse or sewer we recommend this is in line with the non-statutory technical standards for SuDS, specifically S2 and S4. 	The supporting text has been updated to highlight the requirement to consult the IDB and with respect to Byelaws.

Stakeholder	Summary of Key Points Raised	DDNP Response
Norfolk Wildlife Trust	<ul style="list-style-type: none"> • With respect to DDNP14, open space proposed to buffer new housing from the river is welcomed. We recommend the policy wording is updated to ensure that this corridor is a necessary part of any future consent – as opposed to existing phrasing of expected and considered favourably, and that any built development element is delivered as far away as possible from the river corridor. • Recommend that any open space elements of this allocation are added to the Local Green Space list in Policy 15 to ensure its long term retention. 	<p>Added the requirement that built elements are delivered as far away as possible from the river corridor.</p> <p>The policy requires delivery of an area of open space, habitat improvement for local wildlife and a riverside walk. It is also required to include habitat improvement and creation that specifically enhances the function of the adjacent green corridor and buffers the river corridor.</p> <p>LGS addition would be considered at a future review of the plan.</p>
Mid-Suffolk District Council	<ul style="list-style-type: none"> • No objection to removal of site allocation on land north of B1118, Lower Oakley or reduction in the number of dwellings on land south of B1118, Lower Oakley. • The allocated green space should be named in the Local Green Space policy. In addition from our experiences a succinct policy that reads ‘Development in the local green spaces will be consistent with national policy for Green Belts’ is preferred by examiners. 	<p>Great, thank you for confirming this with respect to the site allocations.</p> <p>Decision not to list all the LGS within the policy, these are clearly set out in the maps that follow. Noted, but we feel that there are justifiable deviations that are required for LGS, which we have set out in the Appendix.</p>

Stakeholder	Summary of Key Points Raised	DDNP Response
Historic England	<ul style="list-style-type: none"> • Welcome the positive approach taken to conserve Diss's NDHAs, specifically through the requirement to preserve and convert the disused Victorian School on the Causeway as part of DDNP2. • The two sites in the Waveney Quarter border the conservation area and development has the potential to impact this. It is recommended that Policy 2 could be strengthened by requiring developers to prepare a Masterplan in conjunction with local stakeholders. • In relation to new active travel infrastructure the text make reference to the need for development in such a sensitive location to be in line with national design guidance LTN 1/20. 	<p>Great, thank you</p> <p>Decision not to add the requirement for a masterplan to Policy 2.</p> <p>With respect to travel infrastructure, this requirement has been added to Policy 10 on Cycle and Walking Network.</p>

Stakeholder	Summary of Key Points Raised	DDNP Response
<p>Armstrong Rigg Planning on behalf of Orbit Homes</p>	<ul style="list-style-type: none"> • From the figures within the Major Modifications Consultation Document it appears that DDNP will not be meeting the indicative housing requirement. • Object to the requirement that vehicular access to site allocation 'Flowerdew meadow, Scole' DDNP9 is through 'Land east of Norwich Road' DDNP10 as this land is not in ownership of the client. This will create a ransom situation where neighbouring landowners could demand a significant proportion of the receipts from the development, which would render the proposal unviable. DDNP9 is ready to be delivered now and cannot reasonably be expected to wait until an unknown date before proceeding with a planning application, especially as the site is an existing allocation in the local plan. • 35d/ha is a reasonable density for DDNP9 given it will no longer be an edge of settlement site. • Object to 50 dwellings being allocated on DDNP10. DDNP9 relates far better to the settlement boundary and deliver 10 more dwellings than currently proposed. Recommended that the number of dwellings on DDNP10 be reduced to 40 and the site area be amended accordingly. 	<p>This is incorrect the indicative housing requirement is being met and this is clarified in section 7 of the plan.</p> <p>We have amended the policy wording so that access is required through DDNP10, unless satisfactorily demonstrated this is unfeasible. We have added the requirement for a construction management plan that minimises any impact on existing dwellings.</p> <p>A density of 35dw/ha on the site would conflict with Policy 6 on design which sets out that housing density outside of Diss should aim to achieve 25 dwellings per hectare, which is in keeping with the prevailing rural character of the area, unless it can be demonstrated that this significantly harms viability or is at odds with the local character of the immediate area.</p> <p>Decision not to reduce DDNP10 to 40 dwellings, our strategy is for 50 dwellings on this site, which will enable complementary infrastructure to be delivered.</p>

Stakeholder	Summary of Key Points Raised	DDNP Response
Waveney Rivers Trust	<ul style="list-style-type: none"> • Policy 2 makes no reference to impacts on biodiversity or opportunities for enhancement at DNP14. They consider regeneration of the Waveney quarter needs to include net gain for biodiversity, as required in the NPPF section 174(d), because DNP14 adjoins the River Waveney and is significant as part of a valley ecological corridor and think this has been overlooked. There is an opportunity to enhance ecological connectivity here by recreating wetland alongside the river. This has already been created in an enclosure on the SW side of Morrisons car park at the eastern edge of DNP14. • Policy 7 surface water management. No new home or building should have any clean rainwater connections to the mains sewerage network without exception. This is to ensure that no clean water from new developments ever enters the sewers leading to a further contribution of rainwaters causing sewage overflows into our river. The River Waveney in Diss suffers from almost continual discharge of raw sewage into the river from the treatment plant and this MUST NOT be added to by new developments.” 	<p>Additional text added to Policy 2: ‘Given its proximity to the River Waveney corridor opportunities should be taken to enhance biodiversity and strengthen ecological networks’.</p> <p>Biodiversity net gain is already required as part of national policy and as part of Policy 8 which requires all developments in the plan to maximise habitat opportunities and make provision for local wildlife.</p> <p>With respect to sewage overflows, there is currently no evidence that this is a problem within the plan area, it’s not something that has come out strongly in engagement with the community, therefore decision not to include this.</p>

Stakeholder	Summary of Key Points Raised	DDNP Response
AAH Consultants on behalf of Land Allocation Ltd	<ul style="list-style-type: none"> • DDNP should be delivering a higher level of housing growth than proposed, with the current strategy providing insufficient flexibility to meet local need. This is a vulnerable strategy. • Object to Walcot Hall Meadow as this seeks to sterilize a site which has development potential and are concerned that its inclusion has been influenced by objections to residential development on the proposed land. There has not been effective engagement with Land Allocation Ltd the landowner as part of the process. There is no clear evidence that the meadow is demonstrably special. 	<p>DDNP is meeting the housing requirement set out by the local planning authorities. It is not for the DDNP to set the housing requirement.</p> <p>The DDNP Local Green Space Assessment document provides the justification for inclusion of Walcott Hall Meadow. The landowner was consulted as part of development of the plan on 8 February 2021, which AAH Consultants responded. The landowners was also given the opportunity to formally respond as part of the Regulation 14 Consultation and Major Modifications Consultation.</p>
Scole Engineering	<ul style="list-style-type: none"> • Having submitted a site to the last SNC call for sites I was disappointed to see that it has not been included as a site allocation. 	<p>This site was considered when determining final allocations for the plan. It was included in SOA3. Whilst the site is brownfield and adjacent an existing allocation it falls within Scole Conservation Area. A previous application on this site gave rise to concerns about heritage impact prior to being withdrawn. The decision was made therefore not to include it within the plan, which was already delivering in excess of the indicative housing requirement in Scole.</p>
Bidwells on behalf of G N Rackham & Sons Ltd	<ul style="list-style-type: none"> • Object to the removal of DIS1 from the plan. The reason for removal that there is a 'lack of confidence that the development would be realized in the plan period' is unsubstantiated. A planning application is currently being prepared for this site. The site should be reinstated in the plan. 	<p>DIS1 has been reinstated in the plan, as allocation DDNP7. Based on evidence in the SOA the allocation is for 10 dwellings, rather than 35 as previously allocated under the SNLP. Clear reasoning is set out in the DDNP for this.</p>

Summary of Key Points Raised	DDNP Response
<p>HRA/SEA</p> <ul style="list-style-type: none"> The HRA and possibly the SEA should reference the issue of nutrient pollution into the River Wensum SAC and Broads SAC/Ramsar, considering any indirect implications. 	<p>The SEA and HRA have been updated to reflect this.</p>
<p>MM1: Scale & Location of Growth</p> <ul style="list-style-type: none"> The Council does not agree with the rationale for removal of DIS1. Whilst the site is yet to come forward, the extant plan runs to 2026. The developer has confirmed intention to submit a planning application and the Council continues to forecast the sites delivery before the end of 2026. There is clear evidence the site remains deliverable. The indicative housing target should not be seen as a ceiling, but rather within the context of the NPPF, which provides an objective of significantly boosting the supply of homes. The Council recommends that DDNP take the opportunity to set out a positive framework for the development, to secure local requirements for its delivery. The Thatchers Needle development contributes 49 homes for the purposes of the NP Further detail could be included within the Regulation 16 version of the plan to explain how the housing allocation in Brome & Oakley continues to meet the housing target of 15 homes, given that it delivers just 12 homes. 	<p>DIS1 has been reinstated in the plan, as allocation DDNP7. Based on evidence in the SOA the allocation is for 10 dwellings, rather than 35 as previously allocated under the SNLP. Clear reasoning is set out in the DDNP for this.</p> <p>The housing calculations have been updated to reflect this point.</p> <p>Mid Suffolk Council has confirmed that they are comfortable with quantum and location of development being allocated in the mid-Suffolk parishes.</p>
<p>MM2: Regeneration of the Waveney Quarter</p> <ul style="list-style-type: none"> Concern about the viability of what the NP aims to achieve. The policy and supporting text doesn't go far enough to articulate the Town Council's overall vision for the area in relation to improved connections, future use/relocation of the bus station and redevelopment of the John Grose land / adjacent buildings. There could be specific reference to surface water/fluvial flooding requirements 	<p>Diss Town Council are happy with the vision and policy for the Waveney Quarter.</p> <p>Decision not to include specific reference to flooding here as there is now an overarching surface water management policy within DDNP.</p>

<p>MM3: Diss Business Park</p> <ul style="list-style-type: none"> • Include a map that sets out the extent of the Diss Business Park • The use classes listed are quite rigid and we could consider inclusion of wording that allows for other appropriate employment related development that might be suitable. 	<p>Map now included on Diss Business Park</p> <p>Added allowance for other appropriate employment related development in the policy.</p>
<p>MM4: Surface Water Management</p> <ul style="list-style-type: none"> • Clarity on the type and scale of development this policy applies to should be provided • Not clear how this policy materially adds to existing policy and guidance in this area, for eg the policy could refer to specific locations that are prone to surface water flooding 	<p>The policy applies to all development proposals. It reflects local context, for example the low-lying nature of the area and requires SuDS that are an integral part of green infrastructure.</p>
<p>MM5: Local Green Space</p> <ul style="list-style-type: none"> • The Council objects to the identification of Diss High School Playing fields as a LGS. • The NPPF states that ‘planning authorities should give great weight to the need to create, expand or alter schools through the preparation of plans’. The Council remains concerned that the designation would place inappropriate limitations of the future expansion of the school. • It is noted that the Taverham NP examiner removed school playing fields from the list of LGS. • Whilst the Council does not envisage there would be housing growth on the site, but this designation would restrict the site being used for a future leisure centre/complementary uses. Should locations within /near to the Waveney Quarter be undeliverable for a new leisure centre, further development on the Diss High School site may be the only opportunity for delivering such facilities within Diss. • Para 101 of NPPF sets out that designating LGS should be consistent with local planning of sustainable development and complementary infrastructure, and this designation would not be. 	<p>There is strong local support for the inclusion of Diss High School Playing Fields as a LGS, with the LGS Assessment document setting out how it meets the required criteria.</p>

Summary of feedback from residents

In total there were 36 responses by members of the community.

Responses in relation to Policy 1: Scale and location of housing growth

There was general support for the amendment to this policy and proposed growth strategy.

Individual concerns were raised about the detail of specific allocations, including:

- DDNP2- preference is for regeneration of this site and alternative uses such as retail warehouse should be considered as part of the Retail / Heritage Triangle offer within Diss
- DDNP6 &7- concerns on the environmental and landscape impact of development in this location
- DDNP10 - the allocation is 3 times the minimum figure set by South Norfolk. Also, a concern on the size of site DDN10 (2.6ha) being for the delivery of 50 dwellings when 2.6ha could usually deliver 70 dwellings.

There was a comment that it is a mistake for the DDNP to adopt housing plans imposed by the GNLP planning process and the opportunity for residents to propose a flexible plan with regard to the vision of the parish residents instead of a top-down approach has been denied.

Concerns were raised about strategic infrastructure being in place to support development, in particular doctors, public transport, schools and police.

The distribution of growth across the DDNP is a strategic policy set by the local planning authority and local plans, it has not been within the gift of DDNP to determine the spatial distribution.

Infrastructure will be delivered alongside allocated growth, which may include walking/cycle and public transport infrastructure, though infrastructure such as medical services and schools is considered at a more strategic level than the DDNP.

The level of growth being delivered at DDNP10 will enable infrastructure improvements, including traffic calming to be achieved along Norwich Road, which will be of significant benefit to the village.

Regarding DDNP2, the site which has been derelict for some time already sits within the development boundary for Diss, which means that the principle of development here would already be acceptable, but no development has come forward. The allocation for residential will enable the site to be brought back into use.

The environmental and landscape impacts of DDNP6/7 have been considered in the SOA and SEA assessment of reasonable alternatives.

Responses in relation to Policy 2: Regeneration of the Waveney Quarter, Diss:

Positive comments were received about this policy, including that it will make walking to the shops better, good footpaths/cycleway connections, good use of brownfield land, protection for existing trees, development would enhance this area of the town.

Suggestions for strengthening the policy included:

- Public access to the Waveney Quarter should link with Denmark Bridge permissive footpaths, with a new footbridge built at the eastern end of the site.
- The area should be enlarged to encompass Diss Bus Station and the Grose sites, coming across Park Road and south of the river into Palgrave, which would provide greater opportunity for habitat/green infrastructure improvement or a riverine park.
- Improve pedestrian access between the park and the River Waveney

Decision has been made at this point to retain the current Waveney Quarter boundary, extending this could be considered at the DDNP first review. Improving pedestrian links between the park and the river is already reflected in Policy 2, where it considers opportunities to enhance pedestrian and cycle links between the Waveney Quarter and the town centre favourably. The priorities in relation to walking and cycling are set out in Policy 10 on the Walking and Cycling Network, this includes improvements linking Denmark Bridge as suggested.

Responses in relation to Policy 3: Diss Business Park

There was general support for this policy with respect to securing local employment opportunities. There were a few comments relating to green infrastructure and protecting wildlife in Frenze Beck. There were also comments in relation to the traffic impacts of further development in this area.

The importance of protecting wildlife nearby to the business park is reflected in the policy, which requires any development to enhance the function of the nearby Green Corridor and Frenze Beck County Wildlife Site, demonstrating how any significant harm to wildlife using this will be mitigated. The traffic implications of particular development proposals at the Business Park will be considered as part of the planning application process.

Responses in relation to Policy 7: Surface Water Management

Concern was raised about possible flooding due to overflow of the River Waveney. Some respondents commented that commitment is needed from the local authority and farming community with respect to maintaining ditches.

There was support for use of SuDS including comments such as:

- They like the rainwater harvesting, storage features and green roofs
- Agree with the introduction of a surface water management plan,
- Essential to cope with the increasing extremes of weather and climate change,

Other comments were raised on surface and foul water which has been disposed into the River Waveney and the issues of leaking in Scole. There is concern that additional homes could overwhelm the system.

Community Action 2 considers the maintenance of drainage ditches, with the town and parish councils making a commitment to work with local landowners with the aim of preventing flooding.

The management of foul drainage will need to be considered as part of any planning application.

Responses in relation to Policy 15: Local Green Space:

Broad support for this policy area and the protection of green space generally. Various comments supporting particular LGS designations, including Parish Fields. Some reflection that there is a good balance between protection of the green space and what landowners can reasonable achieve – ie small scale development. Several people commented that that is not enough green space being protected, with a few comments about specific green spaces that have not been designated, such as Brewers Green in Roydon.

A large number of green spaces were considered for designation as LGS. These were reviewed, assessed and consulted upon as part of the plan making process. Only those which meet the criteria for designation in the NPPF and with significant community support have been designated in DDNP. The Local Green Space Assessment document provides further context and detailed assessments for each of the designated LGS.

Appendix A: Issues and Options Consultation Summary Report

Below is the summary report arising from the initial 'vision and themes' consultation undertaken in early 2018. It informed the subsequent development of the plan's vision, themes and aims.

DISS & DISTRICT NEIGHBOURHOOD PLAN STEERING



Public Consultation February-March 2018 Draft Vision and Themes (Scope and Objectives) Summary Report

Background

In recent years a number of proposed developments have been of a scale that would inevitably impact on Diss and its surrounding villages, simply because they would result in increased traffic through outlying villages and Diss itself when accessing shops, businesses and services in the town. The presence of Diss has been sufficient to justify the approval of smaller developments in neighbouring Mid Suffolk, simply on the assumption that Diss makes those developments sustainable, even when they may not be.

As residents know only too well, traffic congestion on the A1066 through Diss and pressures on local services such as healthcare and education are known problems before any more growth takes place.

This led to representatives from Diss Town Council and surrounding parishes, in South Norfolk and Mid

Suffolk, to get together later in 2016 to discuss the potential benefits of co-operating by developing a Neighbourhood Plan. These Plans, introduced in the Localism Act 2011, are intended to let local communities have a say on the way the places where they live will develop in the future.

Discussions continued between the town and surrounding parishes to agree how they could work together, how decisions will be made and how each community can still retain its own identity. In the end, The Heywood, Thrandeston and Wortham & Burgate parishes decided not to take part. That left seven parishes - Diss, Burston & Shimpling, Roydon and Scole in South Norfolk and Brome & Oakley, Palgrave and Stuston in Mid Suffolk - to make the application to have their combined Area designated for a single Neighbourhood Plan. A Steering Group was formally set up to oversee the process.

As part of the application process, Mid Suffolk required each community to be consulted and to agree to proceed with a Neighbourhood Plan. It was decided that this should apply to the South Norfolk parishes as well and a year ago, through the individual annual town/parish meetings, each community did agree.

The Area was formally designated in July 2017. Since then the Steering Group has collated the various issues that have been raised over time and grouped them into the draft Themes.

Using these as a basis, the Steering Group has also responded to the regulation 18 public consultations on the Babergh Mid Suffolk Joint Local Plan and Greater Norwich Local Plan, to

government White Papers on Housing and the Planning Framework, and to planning applications that may affect our Plan.

This Public Consultation was to find out whether the Steering Group had correctly identified the issues and ways of dealing with them, together with how future growth might be planned for and managed.

Methodology

The consultation document was designed to present an engaging and clear format to appeal to the widest potential audience and encourage responses. Accepting that not all households have internet access or are comfortable with responding on-line, the printed version included a pre-printed pull-out response form and a separate pre-paid reply envelope.

An on-line survey format was developed using Survey Monkey and it, with a copy of the consultation document, were made available on the dedicated website: www.dndneighbourhoodplan.co.uk

Respondents were classified either as a 'A Resident', for which their parish and postcode of residence were required, or another class that included Business, Landowner, Statutory Body, or Agent/Other, for which the address and reason for responding were sought.

For the Draft Vision and for each Theme and the Local Issues the response options were:

'Strongly Agree', 'Agree', 'No Opinion', 'Disagree', 'Strongly Disagree'

There was a free-form text box provided for any comments that respondents wish to make.

In both formats the obligatory equal opportunities monitoring questions were included.

On-line responses, which provided for multiple responses from an address, were encouraged as Survey Monkey provides for automatic analysis of the data. Postal responses were registered and transcribed into Survey Monkey, to simplify and speed up the overall analysis.

The consultation document was hand-delivered to approximately 6,800 addresses across the seven parishes by an agent who provides that service for local leaflet campaigns. These addresses included private dwellings, businesses and various organisations.

The first consultation documents were delivered from mid-February and a closing date was set for Friday 16th March. The on-line survey was closed early the following day but a further week, until Friday 23rd March, was allowed for postal responses to be delivered to Diss Town Council offices.

Summary Tabulations

A total of 830 valid responses were received, of which 768 (92.53%) were from residents.

10 responses from residents omitted to identify their parish and postcode. The distribution by parish of the identifiable responses was:

Parish	Number of Responses	Percent of Overall Responses	Number of Registered Electors (3/2018)	Responses as percent of Registered Electors
Brome & Oakley	32	4.22%	193 + 204	8.06%
Burston & Shimpling	41	5.41%	477	8.60%

Diss	359	47.36%	6325	5.68%
Palgrave	85	11.21%	739	11.50%
Roydon	149	19.66%	1962	7.59%
Scole	70	9.23%	1153	6.07%
Stuston	22	2.90%	162	13.58%

The number of responses is compared to the number of Registered Electors as at March 2018.

Only Registered Electors in the Area can vote in any future Referendum on the Draft Plan.

The Draft Vision - the Steering Group had some difficulty in developing appropriate wording. It wanted to express the inter-dependence between Diss as the market town and the surrounding villages without sounding too pretentious, or copying an existing one, and eventually arrived at the simple form of words

"A vibrant community centred around a thriving market town"

intended to create the sense of a single community in and surrounding Diss having a positive outlook.

Although some alternative wording was proposed none really altered the essence of the draft version, although the Steering Group will review this before committing to the final wording of our Vision.

Responses can be summarised as:

	Agree	No Opinion	Disagree
Vision	672 (85.71%)	90 (11.48%)	22 (2.81%)

The Nine Themes were not intended to detail each topic but to provide broad examples of the types of action that could be taken. Not all of these are within the scope of a Neighbourhood Plan but they do have a very close relationship to its success; typical examples are highways, education and healthcare.

The purpose was to establish the strength of feeling associated with each Theme, so that the Steering Group could assess whether it had 'read the runes' correctly and also to have the weight of community opinion behind it in discussions with the agencies responsible for the infrastructure and services.

The responses are re-ordered from the consultation document and ranked by strength of agreement:

Rank	Theme	Agree	No Opinion	Disagree
1	Community, Leisure & Wellbeing	733 (93.50%)	35 (4.46%)	16 (2.04%)
2	Getting About	730 (93.11%)	30 (3.83%)	24 (3.06%)
3	Environment, Heritage & Landscape	712 (90.82%)	57 (7.27%)	15 (1.92%)
4	Shopping	706 (90.05%)	53 (6.76%)	25 (3.19%)
5	Digital Connectivity	689 (87.88%)	87 (11.10%)	8 (1.02%)
6	The Bigger Picture	680 (86.73%)	89 (11.35%)	15 (1.92%)
7	A Place to Live	679 (86.60%)	55 (7.02%)	50 (6.38%)
8	Sustain Local Identities	669 (85.34%)	94 (11.99%)	21 (2.68%)
9	Business & Employment	659 (84.06%)	110 (14.03%)	15 (1.91%)

Note: Due to rounding errors, results may not equal exactly 100%

It is interesting that the traffic issues in 'Getting About' are, marginally, relegated to second place but then 'Community, Leisure and Wellbeing' includes medical and healthcare provision. The high ranking of 'Environment, Heritage & Landscape' suggests strength of feeling for protecting and preserving it and perhaps making more of the River Waveney, while 'Digital Connectivity' is clearly of major concern.

Surprisingly housing and place, together with business, rank the lowest. Curiously, the greatest level of disagreement is with 'A Place to Live' and this will be examined in greater detail to establish why.

With the lowest level of agreement being 84%, the Steering Group can be reassured that the initial identification of issues and suggested ways forward have clearly been accorded substantial support.

Local Issues

A separate question was allocated to each of the parishes to gauge feeling on a range of issues more specific to each. However, responding was open to all since even local issues can be of relevance to others, two clear examples being rat-running/road closures and the future of specific locations.

The responses represent the overall strength of opinion for each Parish; the substantial number having 'No Opinion' is probably due to respondents acknowledging their lack of interest in the local proposals.

Parish	Agree	No Opinion	Disagree
Brome & Oakley	308 (57.04%)	218 (40.37%)	14 (2.60%)
Burston & Shimpling	281 (51.65%)	244 (44.85%)	19 (3.49%)
Diss	596 (85.76%)	65 (9.35%)	34 (4.89%)
Palgrave	356 (64.14%)	180 (32.43%)	19 (3.42%)
Roydon	390 (67.59%)	171 (29.64%)	16 (2.77%)
Scole	329 (60.26%)	205 (37.55%)	12 (2.20%)
Stuston	297 (55.62%)	214 (40.07%)	23 (4.30%)

Note: Due to rounding errors, results may not equal exactly 100%

Further analysis may be appropriate to distinguish the parish-based levels of support for individual proposals. Given sufficient time and capacity, it is possible to establish the patterns of support from surrounding parishes, but only for those key proposals that may benefit from further evidence.

Given the support shown, some of the local issues can and should be taken forward by the appropriate town or parish outside the Neighbourhood Plan process in order to ensure early progression. Others can be progressed independently or more information gathered to clarify responses. The copious free text comments may prove enlightening in this regard too.

Written Responses

A substantial number - nearly 500 - freeform text comments and written responses were received and it was obvious that many people had devoted a lot of thought to them.

A few of these questioned the process, methodology or means of financing and are noted.

Quite a few used the opportunity of contact with 'the council' to complain or raise specific issues that are outside the scope of the Plan. These will be collated and passed on to the appropriate authority or agency. Where certain issues, such as obstructive parking on pavements and littering, affect the quality of life a note will be made to investigate ways of addressing the causes and solutions in the Plan.

The substantial and meaningful remainder are being analysed and will be related to the Themes and individual objectives within them. They will inform and guide the approach to future work on the Plan.

Equal Opportunities Monitoring

Public bodies are required by law to include this and most respondents answered the questions. The distribution of gender and ethnic origin accords with the local profile. Respondents were aged from 18 to 85+ with the greatest number falling within the 65-74 age group.

7. Summary - Where Next?

A year has passed and the round of annual town and parish meetings is again under way. Publication of this Summary Report will enable the electors attending those meetings to be brought up to date on the work of the Steering Group and especially to be informed of the outcomes from this public consultation. Individual parishes are asked to ensure that any further comments and feedback concerning this consultation and future development of the Plan are passed back to the Steering Group.

The Steering Group wishes to thank all of the individuals, businesses and other organisations which took the time and trouble to respond with special thanks to those who put so much effort into their written responses. Thanks are also due to the organisations, especially the local media, that promoted the public consultation and by doing so drove up the response rate three-fold in the closing week.

The outcomes confirm the initial assessments of the issues raised. The Steering Group now has the confidence and weight of public opinion when working with the organisations and authorities that are essential to take development of the Plan forward. Discussions are in hand with the county and district councils and approaches have been made to other providers such as the NHS. A traffic study should soon be underway and that will provide the evidence of where traffic comes from and where it goes to. That information is essential to understanding how much through traffic could be diverted off the A1066 instead of travelling through Diss and the most appropriate direction in which to send it.

The Business Summit, chaired by Richard Bacon MP, has been rescheduled and local businesses and other interested parties will be separately invited to attend this. There was a low level of response from local businesses so they really need to get engaged and involved with development of the Plan.

Now that the Steering Group has your guidance and endorsement, work can proceed in a number of key areas. The contents of the written comments will help inform and direct that work.

Local residents and representatives of organisations who are interested in any aspect of the Plan are reminded and encouraged to visit the website for progress reports and to sign up for updates. Any one of those individuals who took so much time and trouble to set their thoughts down in writing will be very welcome to assist with aspects of the Plan development that interest them or where they have the appropriate experience or expertise - it is after all a community-led plan.

The Steering Group will keep you informed and there will be more opportunities for you to have a say...

Appendix B: Stakeholder Email for Regulation 14

Dear Sir/Madam

Diss and District Neighbourhood Plan Pre-submission Regulation 14 Consultation update

Please note this email supercedes any previous correspondence you may have received from us regarding the Regulation 14 Consultation for the Diss and District Neighbourhood Plan.

The DDNP Regulation 14 consultation dates are now confirmed as: Wednesday 23rd June 2021 through to 5pm Wednesday 18th August 2021.

Dear Sir/Madam

Consultation under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

We are contacting you because you are a statutory consultee, or because you have previously expressed an interest in our emerging Diss and District Neighbourhood Plan (DDNP).

On Wednesday 23rd June 2021, Diss Town Council, as the lead council for the seven parishes involved in the DDNP commences formal consultation on its Regulation 14 Pre-submission draft Diss and District Neighbourhood Plan. **The consultation will run for eight weeks, and is expected to close on Wednesday August 18th 2021.**

A copy of the pre-submission DDNP draft and other supporting documents can be found on the DDNP website: www.ddnp.info

Printed copies are also available for inspection at Diss Town Council offices.

Written representations should be via the online feedback form available on www.ddnp.info, or via email to ddnp@diss.gov.uk

Please note, representations must be received by the above deadline of August 18th 2021.

Acknowledgement of delivery of this email would be appreciated, thank you.

Appendix C: Stakeholder Letter Major Modifications Consultation

Email sent out to stakeholders, landowners, agents, and members of the public who'd consented to being contacted again. This was sent 24 March 2022.

Dear Sir/Madam

'Major Modifications' Consultation under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

We are contacting you because you are a statutory consultee, or because you have previously expressed an interest in our emerging Diss and District Neighbourhood Plan (DDNP) and given your consent to be contacted regarding future consultations.

On Thursday 24th March 2022, at 12 noon, the Diss and District Neighbourhood Plan Steering Group begins formal consultation on the Regulation 14 Pre-submission draft (Major Modifications only). The consultation will run for six weeks, and will close on Thursday 5th May 2022 at 12 noon.

A copy of the Major Modifications Consultation document and its supporting documents can be found on the DDNP website: www.ddnp.info.

Printed copies are also available for inspection at Diss Town Council offices.

Written representations should be via the online feedback form available on www.ddnp.info, or via email to ddnp@diss.gov.uk

Please note, representations must be received by the deadline of Thursday 5th May 2022.

Acknowledgement of receipt of this email would be appreciated, thank you.