



Diss & District Neighbourhood Plan

Reg. 16 Consultation Responses

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Consultation Response Form

Diss & District Neighbourhood Plan 2021 - 2038

Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

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Printed copies of the DDNP have also been deposited at the following locations, where they can be viewed on request during normal opening hours:

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- **Scole Village Stores**, Assett House, The St, Scole, Diss IP21 4DR
- **Stuston - Place Farm Shop**, Place Farm, Old Bury Rd, Stuston, IP21 4AD
- **South Norfolk Council – The Octagon**, 40 Mere Street, Diss, Norfolk, IP22 2AH

HOW TO SUBMIT YOUR COMMENTS

All comments on this Plan must be submitted in writing and be received by no later than **4:00pm on Friday 16 December 2022**.

- **Complete Section One** in full so that your representation(s) can be considered at the Examination stage.
- **Complete Section Two**, identifying which paragraph / policy your comments relate to. You may comment on more than one part of the Plan but must make this clear. Use separate forms if necessary.
- **E-mail your comments to:** neighbourhoodplans@southnorfolkandbroadland.gov.uk
- **Post your comments to:** DDNP Consultation, c/o Place Shaping Team, South Norfolk Council, Thorpe Lodge, 1 Yarmouth Road, Thorpe St. Andrew, Norwich, NR7 0DU

It will not be possible to accept late representations

At the end of the consultation period, all comments received will be collated and then be forwarded on to the appointed Examiner. You should not assume that there will be further opportunities to introduce new information, although the Examiner may choose to seek clarity on certain matters.

Data Protection: All information collected and processed by South Norfolk Council and Mid Suffolk District Council at this stage is by virtue of our requirement under the N'hood Planning (General) Regulations 2012. All comments received will be made publicly available and may be identifiable by name / organisation. All other personal information will be protected in accordance with the Data Protection Act 2018. For more information on how we do this and your rights with regards to your personal information, and how to access it, please visit our websites or contact us at data.protection@southnorfolkandbroadland.gov.uk (SNC) or at customer.services@baberghmidsuffolk.gov.uk (MSDC).

<https://www.southnorfolkandbroadland.gov.uk/data-protection/south-norfolk-council-data-protection>

<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

For Office use only: DD-001

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	Mrs Bronwen Moran
Job Title (if applicable):	
Organisation / Company (if applicable):	Resident of Diss
Address:	
Postcode:	
Tel No:	
E-mail:	

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

For Office use only: DD-001

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	6.3	Policy No.	DDNP1
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input type="radio"/>	Oppose	<input checked="" type="radio"/>
Support with modifications	<input type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

180 houses will increase traffic along Heywood Road considerably. Parking is permitted on Heywood Road and visibility is already compromised in various places. Heywood Road leads to Mount Street where parking leads to in effect one way traffic with others giving way. This will become very difficult. Similarly Sunnyside parking leads to one way traffic alternating in direction with motorists giving way.

Entrance to the estate should not be permitted from the south via Heywood Road. Also exit from the estate should not be permitted onto Heywood Road going south. Other estates in Diss only have one access road.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

Entrance to the estate should not be permitted from the south via Heywood Road. Also exit from the estate should not be permitted onto Heywood Road going south. Other estates in Diss only have one access road.

(Continue on separate sheet if necessary)

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I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

The agreement to these 180 houses was by a very small majority. This is not really a mandate. A hearing would give residents a chance to express their opinion

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed: **B A Moran**

Dated: **2/11/22**

From: [Ann Hughes](#)
To: [Neighbourhood Plans](#)
Subject: Consultation response form Diss & District Neighbourhood Plan 2021 -2038
Date: 02 November 2022 16:42:08

My Representation:

Paragraph No. 123, Policy No. DDNP7

Reason for opposition.

The paragraph states ' Vehicular access via Prince William Way'. This is not the best route.

Modification suggestion.

Vehicular access should be via Vince road to Victoria Road.

Reason for modification.

The Vince Road to Victoria Road traffic lights improvements, are well on their way to completion and therefore access via Vince road would avoid sending the traffic through a well used play area on Prince Willaim Way.

There is already a mix of residential and industrial traffic using Vince Road.

Thank you.

please give me a call, if you need any further information.

Ann Hughes



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<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

For Office use only: DD-03

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	Mr CM Warwick
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	
Postcode:	
Tel No:	
E-mail:	

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

For Office use only: DD-003

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	Bursto and Shimplin	Policy No.	DDNP Cycle Track
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input type="radio"/>	Oppose	<input type="radio"/>
Support with modifications	<input checked="" type="radio"/>	Have Comments	<input checked="" type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

I support a pure pedal/electric cycle track but I am concerned that this could turn into a track for motorbikes and trail bikes by youths coming from Diss to Burston and back. The resulting noise if regularly used would be very unpleasant in what is now a very quiet single track road.

Currently the designated track is regularly used by dog walkers and farm vehicles so groups of motor bikes travelling at speed could be dangerous.

There is about 75 yards of narrow track at the end of the Lane before it disappears into the fields and it is that bit that is a concern because it is used by the Farmer's vehicles, dog walkers and horse riders. Any cycle track will be churned up over time by this traffic. Abuse by motorcyclists will make things even worse and you could have another BOAT on your hands one day.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

Signs need to be erected at both ends of Market Lane indicating that the cycle track is only for pedal cyclists not motorbikes. Barriers or posts need to be placed on the track to make it difficult for motorbikes to speed through.

Consideration might also be given to a speed bump at the end of Market Lane as it merges into the field track.

The cycle track if built needs to be of a design that can only accommodate pedal cycles. ie soft gravel not tarmac

(Continue on separate sheet if necessary)

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I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

As indicated above it would be helpful to have a on site meeting of residents and the Farmer to avoid misunderstanding

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed: CM Warwick	Dated: 3rd NOVEMBER 2022
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From: [Planning Central](#)
To: South Norfolk Council
Subject: 2022 Diss & District Neighbourhood Plan
Date: 11 November 2022 08:38:23

Thank you for consulting Sport England on the above neighbourhood plan. Government planning policy, within the **National Planning Policy Framework** (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important. It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Parts 98 and 99. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Part 99 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy

lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours sincerely

Planning Administration Team

Planning.Central@sportengland.org

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/> If you have any queries about Sport England's handling of personal data you can contact Gaile Walters, Sport England's Data Protection Officer directly by emailing DPO@sportengland.org



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For Office use only: DD-005

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	
Job Title (if applicable):	
Organisation / Company (if applicable):	Norfolk Constabulary
Address:	Estates and Facilities Dept Jubilee House Falconers Chase Wymondham Norfolk
Postcode:	NR18 0WW
Tel No:	(01953) 425540
E-mail:	

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	NPS Property Consultants Ltd
Address:	5 Anson Road Norwich
Postcode:	NR6 6ED
Tel No:	07512 193279
E-mail:	andy.scales@nps.co.uk

For Office use only: DD-005

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	N/A	Policy No.	Aims
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input type="radio"/>	Oppose	<input type="radio"/>
Support with modifications	<input checked="" type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

Central Government place great emphasis on the role of the Police. Furthermore National Planning Policy Framework (NPPF) gives significant weight to promoting safe communities (in section 8 of the NPPF). This is highlighted by the provision of paragraph 92 which states

Planning policies and decisions should aim to achieve healthy, inclusive and safe places which.....

b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas;

In the light of NPPF advice, the Neighbourhood Plan should include within its aims to 'create and maintain a safer community and reduce crime and disorder'. This is an important consideration (based on NPPF advice) and it is considered that scope exists to incorporate this community safety consideration in either Aim 2 or 9 of the Neighbourhood Plan.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

The Neighbourhood Plan should include within its aims to 'create and maintain a safer community and reduce crime and disorder'. This is an important consideration (based on NPPF advice).

Scope exists to incorporate this key community safety consideration in either Aim 2 or 9 of the Neighbourhood Plan.

In view of the scale of growth envisaged in the Neighbourhood Plan, the proposed change will provide the necessary policy focus on reducing the opportunities for crime and disorder (and also help reduce the fear of crime in the Neighbourhood Plan area). This will ensure that the Plan is consistent with the emphasis that the NPPF places on creating safer communities.

(Continue on separate sheet if necessary)

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Signed: Andy Scales	Dated: 14/11/2022
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Data Protection: All information collected and processed by South Norfolk Council and Mid Suffolk District Council at this stage is by virtue of our requirement under the N'hood Planning (General) Regulations 2012. All comments received will be made publicly available and may be identifiable by name / organisation. All other personal information will be protected in accordance with the Data Protection Act 2018. For more information on how we do this and your rights with regards to your personal information, and how to access it, please visit our websites or contact us at data.protection@southnorfolkandbroadland.gov.uk (SNC) or at customer.services@baberghmidsuffolk.gov.uk (MSDC).

<https://www.southnorfolkandbroadland.gov.uk/data-protection/south-norfolk-council-data-protection>

<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

For Office use only: DD-006

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	
Job Title (if applicable):	
Organisation / Company (if applicable):	Norfolk Constabulary
Address:	Estates and Facilities Dept Jubilee House Falconers Chase Wymondham Norfolk
Postcode:	NR18 0WW
Tel No:	(01953) 425540
E-mail:	

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	NPS Property Consultants Ltd
Address:	5 Anson Road Norwich Norfolk
Postcode:	NR6 6ED
Tel No:	07512 193279
E-mail:	andy.scales@nps.co.uk

For Office use only: DD-006

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	6
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input type="radio"/>	Oppose	<input type="radio"/>
Support with modifications	<input checked="" type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

Central Government place great emphasis on the role of the Police. Furthermore National Planning Policy Framework (NPPF) gives significant weight to promoting safe communities (in section 8 of the NPPF). This is highlighted by the provision of paragraph 92 which states

Planning policies and decisions should aim to achieve healthy, inclusive and safe places which.....

b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas;

Nationally the Police have sought to provide advice and guidelines to support and create safer communities, most notably reflected in their Secured By Design initiative. Whilst reference is made in the supporting text to policy 6 to Secured by Design, it is considered that Policy 6 (or its supporting text) should place greater emphasis on issue and include specific reference in the Neighbourhood Plan to maintaining / improving community safety.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

Whilst reference is made in the supporting text to policy 6 to Secured by Design, it is considered that Policy 6 (or its supporting text) should place greater emphasis on community safety and include specific reference in the Neighbourhood Plan to maintaining / improving community safety (to support the NPPF aim to 'create and maintain a safer community and reduce crime and disorder').

In view of the scale of growth envisaged in the Neighbourhood Plan, the proposed change will provide the necessary policy focus on reducing the opportunities for crime and disorder (and also help reduce the fear of crime in the Neighbourhood Plan area). This will ensure that the Plan is consistent with the emphasis that the NPPF places on creating safer communities.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed: Andy Scales	Dated: 14/11/2022
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Consultation Response Form

Diss & District Neighbourhood Plan 2021 - 2038

Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

Diss Town Council have submitted a Neighbourhood Plan (the 'DDNP') to South Norfolk Council and Mid Suffolk District Council. The Plan, which covers the Town and several surrounding parishes sets out a vision for the area and contains policies which it intends will be used to help determine planning applications where relevant. The submitted plan etc. can be found online at:

- www.southnorfolkandbroadland.gov.uk/ddnp
- www.midsuffolk.gov.uk/DissandDistrictNP

Printed copies of the DDNP have also been deposited at the following locations, where they can be viewed on request during normal opening hours:

- **Brome & Oakley Village Hall**, The Street, Brome, IP23 8AE (Contact Parish Clerk to arrange viewing –07554 733621)
- **The Burston Crown**, Mill Rd, Burston, Diss IP22 5TW (Open 12:00-22:30 Wed-Sat)
- **Diss Library**, Church Street, Diss, IP22 4DD
- **Diss Town Hall**, 11-12 Market Hill, Diss, IP22 4JZ
- **Roydon - St. Remigius Church**, Roydon, Diss IP22 5RG
- **Scole Village Stores**, Assett House, The St, Scole, Diss IP21 4DR
- **Stuston - Place Farm Shop**, Place Farm, Old Bury Rd, Stuston, IP21 4AD
- **South Norfolk Council – The Octagon**, 40 Mere Street, Diss, Norfolk, IP22 2AH

HOW TO SUBMIT YOUR COMMENTS

All comments on this Plan must be submitted in writing and be received by no later than **4:00pm on Friday 16 December 2022**.

- **Complete Section One** in full so that your representation(s) can be considered at the Examination stage.
- **Complete Section Two**, identifying which paragraph / policy your comments relate to. You may comment on more than one part of the Plan but must make this clear. Use separate forms if necessary.
- **E-mail your comments to:** neighbourhoodplans@southnorfolkandbroadland.gov.uk
- **Post your comments to:** DDNP Consultation, c/o Place Shaping Team, South Norfolk Council, Thorpe Lodge, 1 Yarmouth Road, Thorpe St. Andrew, Norwich, NR7 0DU

It will not be possible to accept late representations

At the end of the consultation period, all comments received will be collated and then be forwarded on to the appointed Examiner. You should not assume that there will be further opportunities to introduce new information, although the Examiner may choose to seek clarity on certain matters.

Data Protection: All information collected and processed by South Norfolk Council and Mid Suffolk District Council at this stage is by virtue of our requirement under the N'hood Planning (General) Regulations 2012. All comments received will be made publicly available and may be identifiable by name / organisation. All other personal information will be protected in accordance with the Data Protection Act 2018. For more information on how we do this and your rights with regards to your personal information, and how to access it, please visit our websites or contact us at data.protection@southnorfolkandbroadland.gov.uk (SNC) or at customer.services@baberghmidsuffolk.gov.uk (MSDC).

<https://www.southnorfolkandbroadland.gov.uk/data-protection/south-norfolk-council-data-protection>

<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

For Office use only: DD-007

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	
Job Title (if applicable):	
Organisation / Company (if applicable):	Norfolk Constabulary
Address:	Estates and Facilities Dept Jubilee House Falconers Chase Wymondham Norfolk
Postcode:	NR18 0WW
Tel No:	(01953) 425540
E-mail:	

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	NPS Property Consultants Ltd
Address:	5 Anson Road Norwich Norfolk
Postcode:	NR6 6ED
Tel No:	07512 193279
E-mail:	andy.scales@nps.co.uk

For Office use only: DD-007

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	13
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input type="radio"/>	Oppose	<input type="radio"/>
Support with modifications	<input checked="" type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

Central Government place great emphasis on the role of the Police. Furthermore National Planning Policy Framework (NPPF) gives significant weight to promoting safe communities (in section 8 of the NPPF). This is highlighted by the provision of paragraph 92 which states

Planning policies and decisions should aim to achieve healthy, inclusive and safe places which.....

b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas;

The Neighbourhood Plan infrastructure policy (Policy 13) fails to include clear reference to the use of developer contributions and CIL monies (or any subsequent replacement provision) to deliver local initiatives that create safer communities (and reduce crime). It is considered that this omission should be addressed.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

The Neighbourhood Plan infrastructure policy (now Policy 13) fails to include clear reference to the use of developer contributions and CIL monies (or any subsequent replacement provision) to deliver local initiatives that create safer communities (and reduce crime). This omission should be addressed.

In view of the scale of growth envisaged in the Neighbourhood Plan, the proposed change will provide the necessary emphasis on supporting the police in their role to reduce crime and disorder (and also help reduce the fear of crime in the Neighbourhood Plan area). This will ensure that the Plan provisions focus on creating safer communities, consistent with the NPPF provisions.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed: Andy Scales	Dated: 14/11/22
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Diss & District Neighbourhood PlanSouth Norfolk Council Reg.16 Consultation Response

No.	Section	Response
1	6. Delivering Growth; paragraphs 79-84 (pp.29-30)	<p>Paragraphs 79 to 84 set out information on the housing requirement for the D&DNP area. Paragraph 80 refers to there being 122 new homes within existing commitments in Diss. There is no explanation of how the Plan arrives at this figure. The Council expects that this figures relates to the expected number of homes to be delivered through allocations DIS1, DIS2, DIS3, DIS6 and DIS7 as of 1 April 2020.</p> <p>If this is correct, then it appears that no adjustment has been made in the Neighbourhood Plan's calculation of commitment, taking account of the recent permission on DIS6 (referred to elsewhere in paragraph 80), or the reduced numbers that would be delivered on allocations DIS1, DIS2, DIS3 and DIS7 if the sites were developed in accordance with the proposed policies of the Neighbourhood Plan. The consequence of this is that the numbers outlined in the table under paragraph 83 would be incorrect and the table therefore misleading.</p> <p>As such, if the Council is correct in its assumption, the Plan should be modified to reflect the correct position in order to comply with paragraph 31 of the NPPF, which states that policies should be underpinned by relevant and up-to-date evidence.</p> <p>There would also be consequential amendments to paragraph 90 as a consequence of the above.</p> <p>In addition, the Council has previously advised that only 49 net additional new homes could be counted from the former Hamlin site (DIS6). On review, the Council notes that these are permitted as C3 dwellings, not as a C2 institutional use. Therefore this site can be considered to contribution 60 net additional dwellings, not 49 as previously advised.</p> <p>It should be noted that the Council makes further comments in relation to a number of policies that would have a consequential impact on the number of homes delivered within the plan.</p>
2	Policy 1 – Scale and Location of Housing Growth	<p>Whilst the Council is generally satisfied that the proposed allocations are appropriate, for newly promoted allocations within the D&DNP the Council would recommend that Neighbourhood Plan group seek statements of common ground with the respective landowners, site promoters or developers which confirm that the allocations is deliverable/developable in line with the definitions set out within the glossary to the NPPF.</p>

No.	Section	Response
3	Policy DDNP1 - Land east of Shelfanger Road and west of Heywood Road (p.36)	<p>The Council supports the allocations of the site. In respect of criteria (e) the Council would recommend that it is reworded as follows:</p> <p>“Development to be designed to include pedestrian and cycle links that improve connections to the existing network and connectivity to Diss Sports Ground. Pedestrian and Cycle links should not be limited to the east-west link road but should effectively integrate with existing public rights of way to provide the most direct links possible.”</p>
4	Policy DDNP4 - Land west of Nelson Road and east of Station Road, Diss; paragraph 111 (pp.38-39)	<p>Paragraph 111 refers to the employment allocation not being taken forwards in the Greater Norwich Local Plan (GNLP). The GNLP does not specifically allocate sites in Diss, relying on the D&DNP to make these decisions. However, policy 7.2 of the GNLP does refer to the availability of 10.8ha of land for employment purposes. This relates to the retention of allocations DIS8, 9 and 10 of the South Norfolk Site Allocations Plan 2015.</p> <p>Whilst the Council has not previously raised an objection to the reallocation of the site, the Council does not consider that it has agreed to the reallocation of the site, per se. Such a resolution could only be formally made through an agreement of the relevant Council committee.</p> <p>Whilst accepting that (with residential development or proposed allocation to the north and east of the site) a residential use of the site would not be inappropriate in general terms, the site would, however, also be appropriate for employment uses of a type consistent with the neighbouring residential development.</p> <p>The Council is, on reflection, concerned about the loss of this site for employment purposes. The retention of the allocation DDNP17 (previously DIS9) and the specific employment Policy 3 for Diss Business Park (previously DIS10) goes a substantial way to providing for the long-term strategic employment growth in Diss. However, there are limited additional employment opportunities and, given the importance of Diss as a Main Town, the Council considers that the retention of a variety of sites for employment is important to ensuring that policies create the conditions in which businesses can invest, expand and adapt in accordance with paragraph 81 of the NPPF. The Council therefore considers that this site should be retained as a strategic employment allocation for uses compatible with neighbouring development.</p> <p>The Council recognises that this will reduce the overall number of homes provided for within the plan. However, this will not prevent the Neighbourhood Plan meeting its indicative housing requirement provided that the other amendments to sites DDNP6 and DDNP7 that the Council considers necessary are incorporated as recommended.</p>

No.	Section	Response
5	DDNP5 - Land north of Nelson Road, Diss; Paragraph 115 (p.40)	Paragraph 115 includes a factual error. The first sentence correctly identifies the recent planning permission for 77 apartments on the site. However, applying the ratio of 1:1.8 to derive the equivalent number of standard dwellings results in a figure of 43. The fourth sentence states 'The equivalent number of dwellings we can equate this to is 10...' The figure '10' therefore needs amending to '43'.
6	Policy DDNP6; paragraphs 117-120 (pp.40-41)	<p>Paragraph 118 sets out that the SOA identifies the site as Amber, on the basis that it is suitable for allocation subject to certain constraints being overcome.</p> <p>The Council has reviewed the SOA conclusions report. Paragraph 4.4. of the SOA report sets out that DIS3 is suitable for allocation, without caveat. The reference to DIS3 in table 3 of the SOA (page 73) then rates the site as green deeming the allocation of 42 dwellings as appropriate to carry forwards. The overall rating for the site in the SOA as set out in Appendix A - Site Assessment Proforma of the SOA (page 183 - 188) rates the site as green stating that the "site is suitable for development and allocation in the neighbourhood (plan) subject to confirmation of availability" on the basis of an expected development capacity of 42 dwellings.</p> <p>On the basis of the information that the Council has identified, it is unclear why the policy has deemed it necessary to reduce the allocation from 42 homes to 25. This is a low density and the Council is concerned that it does not represent an efficient use of land, which may mean that actual levels of development will significantly exceed this level. The Council considers that the policy should be amended to state approximately 40 homes in line with the current allocation. This is to ensure the efficient use of land in accordance with section 11 of the NPPF.</p> <p>It is also unclear on what basis the Neighbourhood Plan has resolved that a 20m landscape belt is needed along the western boundary of the site. Whilst the boundary of the proposed Strategic Gap (Map 20) is currently difficult to identify precisely, the site appears to sit outside of the Strategic Gap, is bounded by existing allotments and setting the development back eastwards by 20m from the site boundary would not reflect the extent of the development to the immediate north. The boundary proposed is also double the buffer proposed in the current DIS3 policy.</p> <p>On this basis the Council would recommend that criteria (b) of Policy DDNP6 is reworded to reflect the principle of what is attempting to be achieved rather than the precise boundary i.e. "Provision of landscaping along the western boundary to provide a clear visual demarcation between the edge of Diss and the defined strategic gap as set out in Policy 14." This approach is considered to protect the valued landscape buffer in a manner commensurate with its identified quality without potentially, unduly restricting the efficient use of land.</p>

No.	Section	Response
7	Policy DDNP7; paragraphs 121-123 (pp.41-42)	<p>The Council supports the reallocation of the Land North of Vince’s Road.</p> <p>The Council notes that the Policy allocates the site for approximately 10 homes. The SOA (page 63) estimates the capacity of the site to be 14 dwellings. It is unclear why the Policy refers to the lower figure of 10 homes. This appears inconsistent with the evidence that underpins the Neighbourhood Plan.</p> <p>Moreover, the conclusion of the SOA is that it is important to retain the treed area to the east of the site on the basis of its ecological value and function as a noise buffer.</p> <p>This conclusion is clearly different to that previously reached by the Council. It is unclear on what basis the SOA has concluded that the treed area is of particular ecological importance that requires its retention or that it will be necessary to substantively retain the trees in order for future development to achieve compliance with appropriate standards in respect of noise.</p> <p>Whilst it may be appropriate to retain an element of the treed area for the purposes of noise abatement, it is not clear from the evidence the Council has identified that all of it would be necessary for these purposes. Moreover, it is unclear whether there is proportionate evidence that would justify the conclusion of the importance of the trees for their own value or for the purposes of ecology.</p> <p>To ensure that undue restrictions are not placed on the land, restricting its efficient use in accordance with section 11 of the NPPF and its potential contribution to government’s objective of significantly boosting the supply of land for housing, the Council considers that the following amendments should be made to the policy:</p> <p>The site should be allocated to accommodate at least 14 homes. This reflects the findings of the SOA but also the apparent uncertainty in terms of the evidence supporting the need to retain the treed area.</p> <p>Criteria a) and c) of Policy DDNP7 should be aggregated. This should require an arboricultural and ecological assessment to support any planning application to establish the need to retain the area in part or in whole on the basis of the arboricultural or ecological value of the trees. It can reasonably be expected that any future development will be subject to the need to achieve 10% bio-diversity net gain in accordance with the emerging GNLP and/or implementation of the Environment Bill.</p> <p>Given its position and relationship to Frenze Beck. It is somewhat unclear how development can realistically achieve functional connectivity to green infrastructure along Frenze Beck. The Council notes that the site does not lie along a Green Corridor as defined under Policy 8. At the moment it is therefore unclear why this specific criteria is justified. This is distinct from the current Local Plan policy criteria of contributing toward the protection and enhancement of the CWS and adjacent land.</p>

No.	Section	Response
8	Policy DDNP8, Land south of Roydon Primary School, Roydon (p.43)	The Council welcomes the inclusion of an allocation policy within Roydon. This policy meets the indicative housing requirement for Roydon, is consistent with the Government's objective of significantly boosting the supply of home and is in general conformity with the emerging policies for Greater Norwich.
9	Policy DDNP9, Land west of Gissing Road, Burston. (p.45)	The Council welcomes the inclusion of an allocation policy within Buston. This policy meets the indicative housing requirement for Buston, is consistent with the Government's objective of significantly boosting the supply of home and is in general conformity with the emerging policies for Greater Norwich.
10	Policies DDNP10, Flowerdew Meadow, Scole. Policy DDNP11, Land east of Norwich Road, Scole. Policy DDNP12, Former Scole Engineering Site, Diss Road, Scole. (pp.47-49)	The Council welcomes the inclusion of an allocation policies within Scole. These policies meets the indicative housing requirement for Scole, is consistent with the Government's objective of significantly boosting the supply of home and is in general conformity with the emerging policies for Greater Norwich.
11	Policy DDNP16 – The Feather Mills Site, Park Road, Diss (p.59)	Given the recent news regarding the Norfolk Feather Company going into administration it may be worth reflecting this point in the supporting text to Policy DDNP16.
12	Policy 4 – Housing Mix (p.64)	The Council is unclear where the reference to 64 plots has been derived from, although it suspects that this has been calculated on the basis of the expected contribution from allocated sites. Given the potential for actual development numbers to vary, and for further windfall development to occur during the timeframe of the D&DNP the Council consider that the number "64" is removed from the policy. This avoids ambiguity that would otherwise be contrary to paragraph 16 (d) of the NPPF.
13	Section 6.13 – Affordable Housing; paragraph 189 (p.65)	The Council recognises the explanation for the focus on social rent properties and would simply note that the tenure is unlikely to be financially viable in many situations (although developments by Housing Associations may be in a better position to achieve this).
14	Policy 5 – Affordable Housing; paragraph 193 (p.66)	The Council re-iterates its recommendation that paragraph 193 should be incorporated into Policy 5. This will ensure that the policy can continue to be applied in an appropriate and proportionate manner rather than risk becoming out-of-date on the publication of more recent evidence.
15	Community Action 1 – Affordable Housing Cascade; paragraph 198 (p.67)	The Council has concerns about the achievability of the suggested housing cascade. It is suggested that the following wording (highlighted in bold) is added to paragraph 198: <i>'This, however, will be a decision in due course for South Norfolk Council, which will need to come to a view bearing in mind many other considerations including, but not limited to, potential reciprocal arrangements thus mitigating any net loss of provision to the residents of South Norfolk.</i>

No.	Section	Response
16	Section 7 – Growth and Infrastructure Policies; Para. 226 (p.74)	The Council considers that it may be useful to clarify here whether the different parish/town councils in the DDNP area have any aspirations to pool a proportion of their future neighbourhood CIL monies for any local infrastructure projects which will benefit residents in the wider area.
17	Policy 8 - Green Corridors and Biodiversity Enhancement (p.81)	The Council does not object to this policy but notes that the Neighbourhood Plan is seeking net gains in excess of local or national standards. Unless there is specific local justification, this policy may be difficult to apply through the development management process. In addition, the Council would also note that only a nominal increase above national and local policies would result in compliance. Therefore, the Council is uncertain how, in practical terms, this policy is likely to effect meaningful change beyond existing policies.
18	Policy 9 – Road Traffic Improvements (p.84)	The Council will assess the impact on the highway network in connection with the determination of planning applications. Where interventions are secured through development these will need to be fair and reasonably related to the development and what is necessary to make a development acceptable may not be consistent with the current Network Improvement Strategy, although this will be considered in decision making.
19	Section 7.5 Leisure Centre; Para 276 (p.92)	<p>Reference is made within this paragraph to the Greater Norwich Indoor Sports Facilities Strategy (2014). However, a more recent strategy has been published – the Greater Norwich Physical Activity and Sports Strategy (2022), which was commissioned by the Greater Norwich Growth Board. This is underpinned by specific evidence, including a Built Facilities Strategy for South Norfolk which discusses the demand for an indoor sports facility in Diss. These documents are available to view at www.greaternorwichgrowth.org.uk/reports/pass.</p> <p>In order to ensure that the Neighbourhood Plan is referencing the most up-to-date evidence, the Council would suggest that paragraph 276 is updated to reflect the most recent strategy and its key findings as regards Diss.</p>

No.	Section	Response
20	Policy 15 – Local Green Space (p.103); Map 23 – Designated Local Green Space in Diss (p.106)	<p>The Council has previously expressed its in principle support for the identification of Local Green Spaces within the Neighbourhood Plan. However, the Council would repeat it’s objection (raised during the Regulation 14 stage) to the identification of the Diss High School Playing fields as Local Green Space.</p> <p>As set out previously, 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’. The Council remains significantly concerned that the designation of the playing fields as a Local Green Space would place inappropriate limitations on the possible future expansion of the school. Whilst criteria (b) of the policy goes some way to addressing this concern, the Council believes that criteria such as only allowing further expansion where it preserves the openness of the land is an example of an inappropriate restriction, about which the Council is concerned.</p> <p>As noted in earlier comments, the Council is aware of several examples of Neighbourhood Plans, developed locally (including Taverham Neighbourhood Plan and Redenhall w. Harleston Neighbourhood Plan), that have had school playing fields removed from their lists of potential Local Green Spaces due to concerns about their potential impact on school provision.</p> <p>Whilst the Council cannot foresee that it would support the development of the school site for uses such as housing, South Norfolk Council has also previously set out that it would not support any designation that would restrict the leisure centre and other complementary uses being able to potentially relocate to this site. Whilst South Norfolk Council will continue to engage with the Town Council about alternative locations for leisure facilities consistent with the Town Council’s aspiration for the Waveney Quarter, it is not yet certain that such locations are deliverable.</p> <p>Should locations within or nearby the Waveney Quarter be undeliverable, the restriction on further development on the Diss High School site may undermine the ability to deliver such facilities within Diss as a whole. As such, the Council also objects to the designation of Diss High School of Local Green Space on the basis that it is inconsistent with paragraph 101 of the NPPF which sets out that designating Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential infrastructure.</p>

Please note that the following are additional comments that have been approved by officers and portfolio holders at this stage, and which will be reported to South Norfolk Council's Cabinet in due course:

No.	Section	Response
21	Policy 2 – Regeneration of the Waveney Quarter (p.56)	<p>The Council welcomes the inclusion of an overarching policy relating to the Waveney Quarter. The Council notes that the final policy is silent in respect of the Neighbourhood Plan group's aspirations for the quarter, including in respect of the re-use or re-provision of the bus station, redevelopment of the John Gross land and adjacent vacant building and improved links between Fair Green and the Waveney Valley.</p> <p>However, the Council accepts that the scope of the policy is to be determined by the Neighbourhood Plan group and does not consider that the omission of references to these considerations leads to a direct and significant conflict with the basic conditions.</p>
22	Policy DDNP16 – The Feather Mills Site, Park Road, Diss (p.59)	<p>The Council is concerned that 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, and such evidence has not been found with the submission documents. As such, the Council is concerned that, whilst the allocation is positively worded, there is not proportionate evidence that it is deliverable in accordance with the requirements of paragraph 16(b) of the NPPF.</p> <p>The Council are of the opinion that the Policy should be 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). This will help ensure that the policy does not act as a barrier to the appropriate redevelopment of this site and would also help create the conditions within which businesses can invest, expand and adapt in accordance with paragraph 81 of the NPPF.</p>

Mr Richard Squires
582746

Direct Dial: 01223

Senior Community Planning Officer

South Norfolk Council
PL00752405

Our ref:

16 November

2022

Dear Mr Squires,

Ref: Diss and District Neighbourhood Plan Regulation 16 Consultation

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

We would be grateful if you would notify us on eastplanningpolicy@historicengland.org.uk [<mailto:eastplanningpolicy@historicengland.org.uk>](mailto:eastplanningpolicy@historicengland.org.uk) if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

Edward James
Historic Places Advisor, East of England

Edward.James@HistoricEngland.org.uk



Consultation Response Form

Diss & District Neighbourhood Plan 2021 - 2038

Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

Diss Town Council have submitted a Neighbourhood Plan (the 'DDNP') to South Norfolk Council and Mid Suffolk District Council. The Plan, which covers the Town and several surrounding parishes sets out a vision for the area and contains policies which it intends will be used to help determine planning applications where relevant. The submitted plan etc. can be found online at:

- www.southnorfolkandbroadland.gov.uk/ddnp
- www.midsuffolk.gov.uk/DissandDistrictNP

Printed copies of the DDNP have also been deposited at the following locations, where they can be viewed on request during normal opening hours:

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- **The Burston Crown**, Mill Rd, Burston, Diss IP22 5TW (Open 12:00-22:30 Wed-Sat)
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- **South Norfolk Council – The Octagon**, 40 Mere Street, Diss, Norfolk, IP22 2AH

HOW TO SUBMIT YOUR COMMENTS

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- **Complete Section One** in full so that your representation(s) can be considered at the Examination stage.
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It will not be possible to accept late representations

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<https://www.southnorfolkandbroadland.gov.uk/data-protection/south-norfolk-council-data-protection>

<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

For Office use only: DD-010

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	Jim Bootman
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	
Postcode:	
Tel No:	
E-mail:	

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

For Office use only: DD-010

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	321	Policy No.	15 LGS designation
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input checked="" type="radio"/>	Oppose	<input type="radio"/>
Support with modifications	<input type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

Protection of green, open spaces within the Diss Parish area (and across all DDNP Parishes) is essential for ecological/biodiversity reasons, as well as the wellbeing of residents. In particular, Diss Parish Fields forms an important part of the identified green corridor running North from the river Waveney, through Diss Park to the Diss Town Cemetery. This and other sites identified for LGS designation in the Diss & District Neighbourhood Plan Policies Maps require protection from development.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

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I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed: **Jim Bootman**

Dated: **22/11/2022**



Consultation Response Form

Diss & District Neighbourhood Plan 2021 - 2038

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<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

For Office use only: DD-011

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	Paul Macbay
Job Title (if applicable):	Arboricultural worker
Organisation / Company (if applicable):	
Address:	
Postcode:	
Tel No:	
E-mail:	

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

For Office use only:

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	15
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input checked="" type="checkbox"/>	Oppose	<input type="checkbox"/>
Support with modifications	<input type="checkbox"/>	Have Comments	<input type="checkbox"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

Parish Fields support for it becoming a publicly owned local green space. I often when in Diss think it would be well appreciated being away from the A1066 unlike the Mere park. It's (parish Fields) a beautiful little spot and wish it was publicly accessible.

I would to support any of the proposed green space enhancements around the town to lend itself to greening the town as much as is possible.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?*Please be as brief and concise as possible ..**(Continue on separate sheet if necessary)*

If you are including additional pages these should be clearly labelled and referenced.

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I consider that a hearing should be held because ...*Please be as brief and concise as possible ..**(Continue on separate sheet if necessary)***Please indicate (tick) whether you wish to be notified of:**

The publication of the recommendations of the Examiner	
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	

Signed: Paul macbay**Dated: 28/11/2022**

I have concerns with the new development DDNP10 for 50 dwellings in Norwich road Scole. The parish of Scole is one of the 48 villages that form part of the South Norfolk Village Cluster Allocation Plan (VCHAP) bearing this in mind my understanding is that South Norfolk council have set a minimum target of 25 new houses for the parish of Scole (made up from sites of 12 and over dwellings). The current proposed DDNP for Scole is for 75 dwellings which is 3 times this minimum figure set by South Norfolk and this seems excessive.

The other concern is the size of the DDNP 10 site that being 2.6 hectares to deliver 50 dwellings. A development of 2.6 hectare would normally deliver 70 dwellings, whereas a 50 dwelling development would normally be achieved on a 2 hectare site.

I fully except that the natural area for future development within Scole is the DDNP 9 site behind Flowerdew Meadow along with the partial development of the DDNP 10 site. With the development of site DDNP 9 delivering 25 dwelling and the partial development of site DDNP10 to possibly deliver a further 15 dwelling this would give 40 in total and this would easily meet the housing target for Scole for the next 15 years.



Consultation Response Form

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Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	Mr J O'Sullivan
Job Title (if applicable):	Head Of Planning
Organisation / Company (if applicable):	AAH Consultants
Address:	1 Bar Lane York
Postcode:	YO1 6JU
Tel No:	01904 629258
E-mail:	admin@aahplanning.com

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	Land Allocation Ltd
Address:	C/O AAH Consultants 1 Bar Lane York
Postcode:	YO1 6JU
Tel No:	01904 629258
E-mail:	admin@aahplanning.com

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	Policy 1
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input type="radio"/>	Oppose	<input checked="" type="radio"/>
Support with modifications	<input type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

We have previously made representations on the GNLP that it should be:

- targeting a higher housing requirement than the Local Housing Need calculated using the Standard Methodology and providing for a housing requirement uplift is necessary to support identified economic growth
- that a 20% buffer above the uplift for economic growth would ensure that the plan is future-proofed and provide flexibility, choice and competition in the housing market reflecting government guidance.
- As the Main Town that the GNLP identified with the widest range of services the distribution of housing should reflect this by increasing the proportion of new homes to Diss.

We are concerned that should the GNLP housing numbers change then the Neighbourhood Plan will be out of step with the Plan. Further the amendments made to the Neighbourhood Plan do not address this point instead they reduce the level of new growth by virtue of the grant of recent planning permissions and suitability assessments of previous sites in respect of scale. To then only allocate enough housing land to meet this housing requirement once planning permissions have been taken into account would represent both a vulnerable overall strategy and would surely be contrary to the original intention of the GNLP to provide for new housing from planned for sites.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

We suggest that the Parish Council revisit Policy 1 with further consideration of the above points on the local housing need, housing allocations and our clients land interest to the north of Walcot Rise, Diss. The reason is to ensure flexibility, choice and competition in the housing market reflecting government guidance.

(Continue on separate sheet if necessary)

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Signed: **J O'Sullivan**

Dated: **30/11/2022**



Consultation Response Form

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All respondents should complete Part A. If you are an Agent please complete Part's A & B

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Title / Name:	Mr J O'Sullivan
Job Title (if applicable):	Head Of Planning
Organisation / Company (if applicable):	AAH Consultants
Address:	1 Bar Lane York
Postcode:	YO1 6JU
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Client / Company Name:	Land Allocation Ltd
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Postcode:	YO1 6JU
Tel No:	01904 629258
E-mail:	admin@aahplanning.com

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	Policy 15
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input type="radio"/>	Oppose	<input checked="" type="radio"/>
Support with modifications	<input type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

Policy 15 seeks to designate 51 identified sites as Local Green Space including our clients land interest at Diss: Local Green Space 19 Walcot Hall Meadow. On behalf of our client we have previously made submissions on this policy.

We are concerned that the decision to designate the site as a Local Green Space is unduly influenced by objections to the residential development proposed on the land and not based upon a robust assessment forming part of the required evidence base to support the Neighbourhood Plan. Paragraph 318 of the DDNP states that 'a robust process has been followed' however there has been little to none consultation with our client or the landowner on the designation of the site as Local Green Space.

It is imperative that the plan makers can clearly demonstrate that the requirements for LGS designation are met. Paragraph 102 of the Framework is explicit in that the designation of LGS should only be used:

- Where the green space is in reasonably close proximity to the community it serves;
- Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- Where the green area concerned is local in character and is not an extensive tract of land.

None of which apply, and again this does not comply with the Framework. The site is not designated as a site of wildlife significance as a whole. The pond and a central mature tree provide habitats for protected species which are already statutorily protected. The Town Council has not, therefore, demonstrated that the site is special and holds a particular local significance apart from habitats which could be retained within a sensitive development proposal in any case.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

We suggest that the Parish Council revisit Policy 15 and ensure that sufficient evidence is provided to demonstrate consistency with the requirements of the Framework and in regards to Diss Local Green Space 19: Walcot Hall Meadow this should be deleted as a designation from Policy 15.

(Continue on separate sheet if necessary)

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I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed: **J O'Sullivan**

Dated: **30/11/2022**

2nd December 2022

Anglian Water Consultation Response

Diss & District Neighbourhood Plan Consultation – Reg.16

1. Anglian Water

- 1.1. Anglian Water is the water and water recycling provider for over 6 million customers in the east of England. Our operational area spans between the Humber and Thames estuaries and includes around a fifth of the English coastline. The region is the driest in the UK and the lowest lying, with a quarter of our area below sea level. This makes it particularly vulnerable to the impacts of climate change including heightened risks of both drought and flooding, including inundation by the sea.
- 1.2. Additionally, our region has the highest rate of housing growth in England. The 2021 Census report identifies that population growth in the East of England region was 8.3% in the past decade against a national average of 6.6%.
- 1.3. Anglian Water has amended its Articles of Association to legally enshrine public interest within the constitutional make up of our business – this is our pledge to deliver wider benefits to society, above and beyond the provision of clean, fresh drinking water and effective treatment of used water. Our Purpose is to bring environmental and social prosperity to the region we serve through our commitment to Love Every Drop.

2. Anglian Water and Neighbourhood Development Plans

- 2.1. Anglian Water is the statutory water and sewerage undertaker for the Diss & District neighbourhood plan area and is identified as a consultation body under the Neighbourhood Planning (General) Regulations 2012. As the neighbourhood plan area extends across two local planning authority areas, South Norfolk and Mid Suffolk, our responsibilities differ – for South Norfolk we are responsible for both water supply and wastewater, and for Mid Suffolk we are only responsible for wastewater.
- 2.2. Anglian Water wants to proactively engage with the neighbourhood plan process to ensure the plan delivers benefits for residents and visitors to the area, and in doing so protect the environment and water resources.

3. Commentary on the Diss & District Neighbourhood Plan

- 3.1. Anglian Water congratulates Diss & District on the production of a comprehensive neighbourhood plan which addresses a range of issues important to the local communities within the neighbourhood plan area, whilst also planning for future growth.
- 3.2. The following comments are made in relation to ensuring the making of the neighbourhood plan contributes to sustainable development and has regard to assets owned and managed by Anglian Water.

Ten Aims for the Plan

We support the aims for sustainable growth (1) which is aligned with required infrastructure (3). We also welcome the aim to address local climate change issues through all aspects of the Local Plan (10) - these align with our strategic direction statement and long-term strategic ambitions.

2nd December 2022

POLICY 1 - Scale and Location of Housing Growth

- 3.3. We support the spatial strategy locating the majority of development within or adjoining Diss, as the main town and largest settlement in the neighbourhood plan area. This spatial strategy is less carbon intensive compared to more rural locations, given the existing infrastructure and facilities available. There is also sufficient headroom at the Diss water recycling centre to accommodate the level of future growth proposed.
- 3.4. Where there is an existing water mains/foul sewer(s)/ rising main (pressurised sewer)/surface water sewer(s) in Anglian Water's ownership within the boundary of a proposed site, the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing water mains/sewer(s) should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required. It is important to ensure that any Anglian Water assets that may be affected by development proposals are reflected in any site allocation policy. We have suggested appropriate policy wording for those allocations where we have existing assets that require safeguarding.

Site Allocation	Anglian Water Commentary
DDNP1 Land East of Shelfanger Road and west of Heywood Road, Diss 180 homes	<p>As a strategic housing site for the neighbourhood plan, we welcome and support the measures included in Policy DDNP1; particularly those related to the delivery of biodiversity net gain and the sustainable design and construction principles to achieve net zero emissions. This aligns with our purpose and strategic long-term ambitions.</p> <p>Given the quantum of development, we would welcome recognition of improving water efficiency on the site to align with sustainable construction and energy efficient designs. Opportunities to seek integrated water management on the site using sustainable drainage systems and rainwater capture and reuse to reduce surface water flood risk and demand on potable water supply.</p> <p>Whilst the emerging Local Plans have policies to ensure new homes achieve a higher standard of water efficiency than Building Regulations Part G where evidence justifies it (for housing development, 110 litres per person per day), we would welcome this approach in the neighbourhood plan. We recommend that the policy is amended as follows:</p> <p><i>h) The development will incorporate sustainable design and construction principles that maximise potential to achieve net zero carbon emissions and realise sustainability improvements over and above that set by Building Regulations, including meeting the</i></p>

2nd December 2022

Site Allocation	Anglian Water Commentary
	<p><u>higher optional standard for water efficiency</u>, unless it can be demonstrated that this is not feasible.</p> <p>As a mains water pipe traverses the site, we suggest the following criterion is included in the policy:</p> <p><u>Require the safeguarding of suitable access for the maintenance of water supply infrastructure;</u></p>
DDNP2 Site of derelict Victorian Infant School, the Causeway, Diss 10 homes	<p>As we have assets within the site, we suggest the following criterion is included in the policy:</p> <p><u>Require the safeguarding of suitable access for the maintenance of water supply infrastructure;</u></p>
DDNP4 Land west of Nelson Road and east of Station Road, Diss 25 homes	<p>Anglian Water has network assets on the boundaries of the site and therefore we would suggest the following wording is included as a policy requirement:</p> <p><u>Require the safeguarding of suitable access for the maintenance of water supply and foul water drainage infrastructure.</u></p>
DDNP7 Land north of Vince's Road, Diss 10 homes	<p>Given the number of dwellings we consider that policy criterion h) is unnecessary and can be removed from the policy given that Policy 13 Funding and Delivery of Infrastructure adequately addresses this requirement.</p>
DDNP8 Land south of Roydon Primary School, Roydon 25 homes	<p>Anglian Water has network assets on the boundaries of the site and therefore we would suggest the following wording is included as a policy requirement:</p> <p><u>Require the safeguarding of suitable access for the maintenance of water supply and foul water drainage infrastructure.</u></p>
DDNP9 Land west of Gissing Road, Burston 25 homes	<p>We note that the supporting text states that Anglian Water has advised of constraints to the provision of sewerage infrastructure in this location. This is because Burston Station Road water recycling centre (WRC) only serves a small number of properties, therefore, even a relatively small development (of 25 dwellings or less) may have a disproportionate impact on the WRC, and it is likely that WRC improvements would need to be delivered through the business planning process. Further assessment would need to be undertaken by Anglian Water to confirm exactly what the infrastructure impact would be, and developers should engage with our pre-development team at an early stage to enable us to understand the potential impact a new development may have on</p>

2nd December 2022

Site Allocation	Anglian Water Commentary
	<p>our assets. The applicant/developer may also examine alternative foul water disposal solutions, including a dedicated package treatment plant.</p> <p>There are Anglian Water assets along the eastern boundary of the site and therefore we suggest the standard wording should be included as a policy requirement:</p> <ul style="list-style-type: none"> - <u>the safeguarding of suitable access for the maintenance of foul drainage infrastructure.</u>
<p>DDNP15 Land off Park Road, Diss 10 homes</p>	<p>We support the policy approach to improve surface water run-off rates and suggest that it would be helpful if this allocation policy specifically mentioned sustainable drainage systems which can provide multi-functional benefits to support the delivery of blue/green infrastructure and biodiversity net gain.</p> <p><i>g) Development will incorporate opportunities to minimise surface water run-off rates using sustainable drainage systems, particularly in the creation of new site access and egress points where there is known high surface water flood risk on adjacent roads;</i></p> <p>In relation to criterion h) we consider that Policy 13 Funding and Delivery of Infrastructure adequately addresses this point, and therefore can be removed from the policy.</p>
<p>DDNP16 The Feather Mills site, Park Road, Diss 12 homes</p>	<p>We consider that a new leisure centre presents opportunities to minimise energy use and utilise integrated water management systems such as rainwater harvesting and greywater reuse, and such measures should be specifically addressed within the site allocation policy.</p> <p>We support the policy requirement in relation to green infrastructure and improving habitat along the River Waveney. We suggest the policy could be strengthened to include sustainable drainage systems as part of the green infrastructure provision on the site.</p> <p><i>g) contribution made towards green infrastructure provision (including habitat creation along the River Waveney), and ensuring provision of sufficient sustainable drainage systems to appropriately manage surface water run-off from the building and any non-permeable areas of hard standing;</i></p>

2nd December 2022

Paragraph 224

3.5. We support the wording of this paragraph regarding the need to plan for infrastructure capacity, and that Anglian Water will respond appropriately to developers when connections are sought for developments within the neighbourhood planning area, including when we are consulted through the plan-making and planning application process.

Policy 7 Surface Water Management

3.6. We support this policy which includes a particular emphasis on sustainable drainage systems (SuDS). We agree that a collaborative effort is required to address surface water flood risk by all stakeholders that have a role in water and flood management. We work in partnership with a range of stakeholders across our region to address flood management issues. Furthermore, our draft Drainage and Wastewater Management Plan (DWMP) identifies future strategies for Diss water recycling catchment, with SuDS proposed as a key part of mixed strategies to address surface water inundation of our water recycling networks by 2035, with a long-term strategy of 50% surface water removal from our network by 2050.

3.7. As part of our [Get River Positive](#) commitment, we've pledged to be as transparent as possible with the data we collect about our water recycling network and the improvements that we are making, especially around storm overflows. We have provided an online map that shows our latest investment schemes to improve the environment, including 2021 storm overflow data and the river network. Investment schemes to improve the local environment and river health include a number of storm overflows that are monitored where further investment has been confirmed to address performance, or where event duration monitors are due to be installed. Information can be found on our website: <https://www.anglianwater.co.uk/services/sewers-and-drains/storm-overflows/improving-rivers-and-coastlines>

Community Action 2 - Maintenance of Drainage Ditches

3.8. We are supportive of this action, as this can minimise the risk of sewer flooding if ditches are maintained. When they become blocked and overflow this can cause inundation of our foul drainage network and this increases the risk of external and internal sewer flood events, which we work hard to avoid. The roll out of event duration monitors across our storm overflows means we can proactively work to ensure we are investing and addressing issues where required.

7.2 Green Infrastructure

3.9. We support this section and the positive outcomes sought for biodiversity. It would be helpful if the supporting text could indicate that SuDS are an example of the multi-functional benefits of delivering green and blue infrastructure that can also contribute to biodiversity net gains.

Policy 13 - Funding and Delivery of Infrastructure

3.10. Anglian Water supports this policy regarding the requirement for an infrastructure impact statement. We would encourage developers to engage with our pre-development team, as consideration of wastewater issues, including the capacity of the existing systems and the need for any new infrastructure is essential in respect of well-planned development proposals. We provide informative comments on foul and surface water proposals for major planning applications to local planning authorities, ensuring that a sustainable drainage strategy is



2nd December 2022

prepared that mitigates any risk of flooding or pollution downstream and which protects our existing and future customers.

Policy 15 - Local Green Space

3.11. We note that the policy includes criteria for appropriate development within land designated as LGS. We suggest that this should include maintenance and improvements to our assets and network, as several proposed areas of LGS have Anglian Water network assets within their boundaries. Whilst such operational work can generally fall within permitted development, sometimes planning permission is required.

Design Guidance:

DG18. Aim to include environmental and energy efficient solutions

3.12. We support the intention of this code which encourages rainwater harvesting and permeable paving, but we consider it could be enhanced by specifically including measures to assist with energy and water efficient designs to reduce embodied and operational carbon of new developments, including installation of water efficient fixtures and fittings.

4. Conclusion

4.1. Anglian Water supports the direction taken in the Diss & District Neighbourhood Plan, subject to the suggested clarifications – and taken with the adopted and emerging Local Plans, we consider that it is consistent with our strategic direction.



Consultation Response Form

Diss & District Neighbourhood Plan 2021 - 2038

Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

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- www.midsuffolk.gov.uk/DissandDistrictNP

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- **Diss Library**, Church Street, Diss, IP22 4DD
- **Diss Town Hall**, 11-12 Market Hill, Diss, IP22 4JZ
- **Roydon - St. Remigius Church**, Roydon, Diss IP22 5RG
- **Scole Village Stores**, Assett House, The St, Scole, Diss IP21 4DR
- **Stuston - Place Farm Shop**, Place Farm, Old Bury Rd, Stuston, IP21 4AD
- **South Norfolk Council – The Octagon**, 40 Mere Street, Diss, Norfolk, IP22 2AH

HOW TO SUBMIT YOUR COMMENTS

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- **Complete Section One** in full so that your representation(s) can be considered at the Examination stage.
- **Complete Section Two**, identifying which paragraph / policy your comments relate to. You may comment on more than one part of the Plan but must make this clear. Use separate forms if necessary.
- **E-mail your comments to:** neighbourhoodplans@southnorfolkandbroadland.gov.uk
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<https://www.southnorfolkandbroadland.gov.uk/data-protection/south-norfolk-council-data-protection>

<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

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Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	Colin Edmondson
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	
Postcode:	
Tel No:	
E-mail:	

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

For Office use only:

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	273, 274,	Policy No.	10
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input type="radio"/>	Oppose	<input checked="" type="radio"/>
Support with modifications	<input type="radio"/>	Have Comments	<input checked="" type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

Ref. Policy 10 – Walking and Cycling Network (page 87), supported by Map 19, showing the DDNP-wide walking and cycling network (page 90).

I am in objection to the planned cycle network between the corner of Durbidges Hill and Burston road.

Has any evidence been gathered that would indicate a cycle network in this specific area is required? If so, who and how many cyclists would the network provide for? What economic evidence has the council obtained to suggest that this is a meaningful use of public money?

The planned route cuts directly across our grazing field that is used for grazing horses and has in the past been used for livestock. The proposed route would then go through the 'Carr', a wooded wetland and designated, according to the plans as a 'Local Green Space' (LGS). The LGS is designated in the plans as a protected area. The cost of routing through this LGS, and the environmental impact of the need to fell a substantial number of trees would surely be prohibitive.Continued on separate sheet.....

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

Walk the proposed route

Use the current footpath, not a separate, new cycle path.

Set out how it will be maintained, construction materials and means to create gated access

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

The proposed route is not feasible due to large felling of trees required.
There is very limited detail and no clear plan of how the cycle path will be constructed and maintained

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed: **Colin Edmondson**

Dated: **06/12/22**

DNPP Objection

Ref. Policy 10 – Walking and Cycling Network (page 87), supported by Map 19, showing the DDNP-wide walking and cycling network (page 90).

I am in objection to the planned cycle network between the corner of Durbidges Hill and Burston road.

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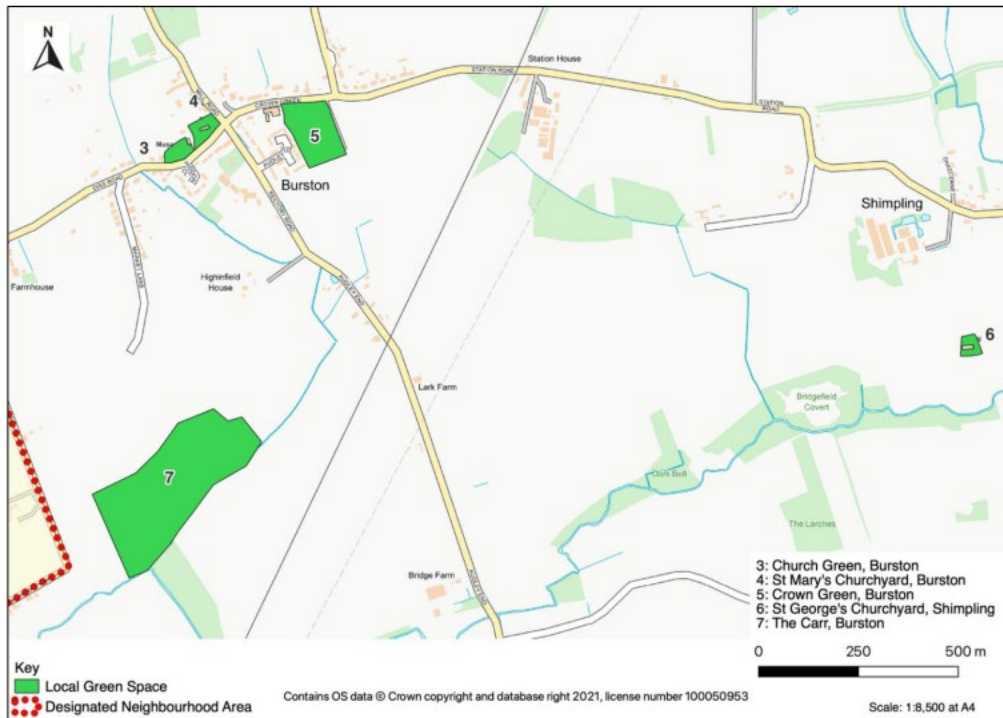
The route indicated also appears to cut through residential gardens as it meets at Audley End. This would suggest that an inspection of the route has not been carried out to understand its impact. The type of land has not been considered, in the fact that it is boggy and often floods.

There is a footpath that runs along the side of the grazing field and adjacent to the 'Carr' that has been ignored and would potentially provide a more appropriate alternative, if the need can be demonstrated in the first instance. However, the footpath itself is unsuitable for cyclists. For approximately 6 months of the year the area is wet, boggy and frequently flooded. I have photos to demonstrate this, and any inspection would confirm this.

The part of the footpath that goes through the 'Carr' is overgrown with thick nettles during the spring and summer months, chest high, and is not cut back unless I do so myself. I have done this twice a year for the past 10 years to keep it clear, despite it not being my land. Who will maintain this in the future? You reference that *'The Parish Councils will work with other agencies to ensure effective management of the walking and cycling network, in particular coordinating regularly cutting back vegetation where it infringes on the width of paths.'* This has historically not been the case and therefore what reassurances do you have that this would change in the future?

If a cycle path is to be introduced, then who will be responsible for replacing the gates? As there is currently horses and potentially livestock in the field in the future, the gates would need to be replaced with gates that both protect the animals in the field from escape and presumably allow cyclist to pass through with their bicycles.

There is no indication of the type of cycle network that is proposed in terms of materials that would be used to create the cycle path. For this path to be viable for cyclist, this would require aggregate and hard surfacing to negate the boggy nature of the land. The length of this would mean it would be costly. If there are no plans to create a suitable cycle path surface than any cycling would be almost impossible as the land currently is. If attempted, cycling would damage the land as tyres and boggy land do not mix. The path at present is barely suitable for walking during the autumn and winter months.

BURSTON & SHIMPLING LGSS**MAP 22** Designated Local Green Space in Burston & Shimpling**POLICY 15 – Local Green Space**

The areas shown in Maps 12 to 18 are designated as Local Green Space for special protection. These will be protected from inappropriate development in accordance with Green Belt Policy, except for the following deviations:

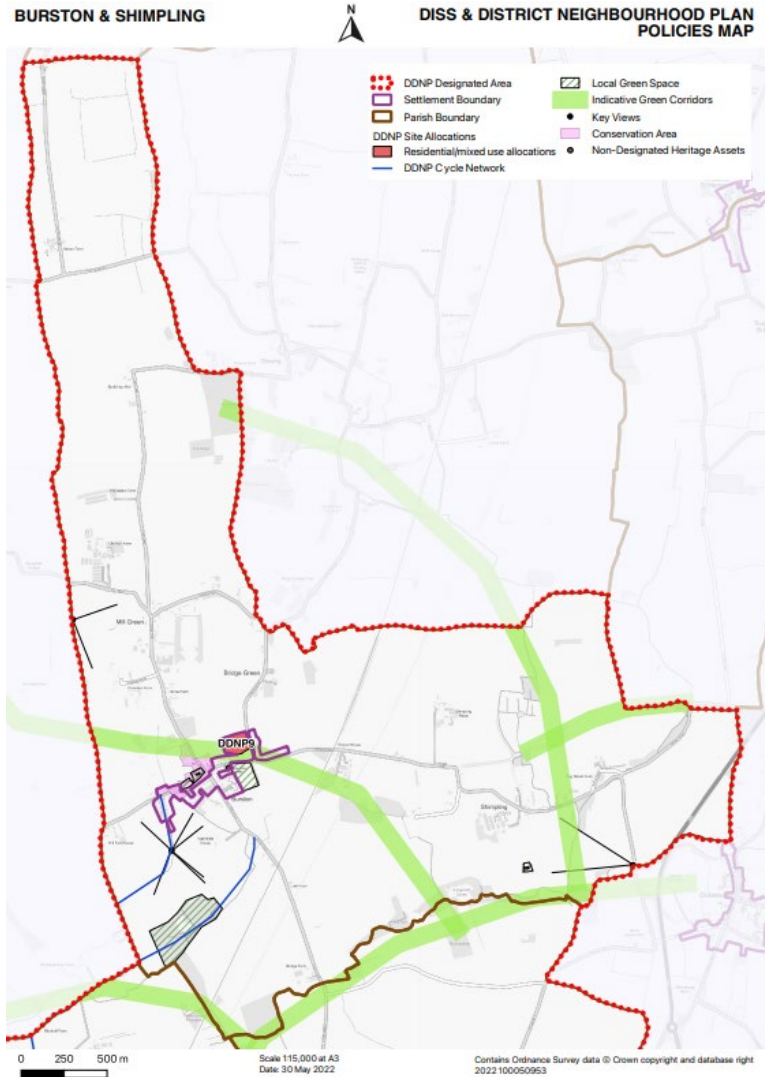
New buildings are inappropriate development, with the only exceptions to this:

- a) Buildings for forestry or agriculture where the Local Green Space is used for commercial woodland or farmland;
- b) The provision of appropriate facilities in connection with the existing use of land where the facilities preserve the openness of the Local Green Space and do not conflict with the reasons for designation that make it special to the community, such as for recreation or ecology;
- c) The extension or alteration of a building if it does not impact on the openness or the reasons for designation that make Local Green Space special to the community; or
- d) The replacement of a building provided the new building is in the same use and not materially larger than the one it replaces.

Other appropriate development includes:

- e) Engineering operations that are temporary, small-scale and result in full restoration;
- f) The re-use of buildings provided that the buildings are of permanent and substantial construction; or
- g) Material changes in the use of land where it would not undermine the reasons for designation that make it special to the community.

Proposals that are on land adjacent to Local Green Space are required to set out how any impacts on the special qualities of the green space, as identified by its reason for designation, will be mitigated.



This is an existing footpath around the field and runs adjacent eastwards along the LGS area

Proposed route is through 'The Carr', a designated Local Green Space (LGS). It is also woodland and

- would take considerable cost to clear.
- Removing trees does not comply with environmental policy

Objection points

- Gates and type to ensure animals and livestock cannot escape and cyclist secure
- Flooded in winter and boggy from autumn through to spring (Photos) and not suitable for cyclists
- Economic return on cost of creating cycle path
- No mention of type of surface, materials
- Part of horse exercise track
- Evidence of need – numbers / opinion
- Keeping area clear – I tackle overgrowing nettles – who would do this



Consultation Response Form

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Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	Dr G. M. Courtier
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	
Postcode:	
Tel No:	
E-mail:	

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	All	Policy No.	All
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input type="radio"/>	Oppose	<input checked="" type="radio"/>
Support with modifications	<input type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

Inviting a response now to various individual Paragraphs and Policies that deserve comment typifies the impracticality of this Diss & District Neighbourhood ' Plan '. The Regulation 16 (2021-2038) Submission Draft June 2022 has emerged after considerable work by the DDNP Steering Group, including a commissioned suite of extensive documents by Contractors to provide referenced background material. However, it is not a typical plan but reads as a discussion or reference document.

Unfortunately it provides few general guidelines, and no mention of funding, budgets, priorities or proposed schedules. No proposals are given on whether, how, and when Statutory Authorities might implement the different so called Policies, or use them in practice. Rather than addressing the detailed text of the document, only general comments seem appropriate here.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

Much of the detailed subject matter is extracted from existing documents by the contractors. Collation of the visions of residents from the neighbourhood could have been condensed to broad guidelines, and general principles for improving the district over time could have been proposed. Detailed ' Policies ' as stated will inevitably need changes, and should have given flexible yet workable frameworks within which properly sustainable progress might evolve over many years, to prevent harmful development, damaging to future generations up until 2038.

Giving specific detail has obscured the document ' s purpose of proposing long-term workable visions from residents. In particular the detailed discussion on housing development is constrained and predicated too much on earlier outdated planning assumptions. Many housing totals were urged on Parish residents by early DDNP consultation procedures, and the real preferences and visions of residents were suppressed by the nature of some questions. A true ' Neighbourhood ' Plan was thereby flawed from the start in 2018.

(Continue on separate sheet if necessary)

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The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed: G M Courtier

Dated: 7 December 2022



Consultation Response Form

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<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

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Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	Mr Rob Scadding
Job Title (if applicable):	
Organisation / Company (if applicable):	Planning Potential Ltd
Address:	Magdalen House 148 Tooley Street London
Postcode:	SE1 2TU
Tel No:	0207 357 8000
E-mail:	rob.scadding@planningpotential.co.uk

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	Aldi Stores Ltd
Address:	
Postcode:	
Tel No:	
E-mail:	

For Office use only:

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	DDNP16
----------------------	--	-------------------	--------

Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input type="radio"/>	Oppose	<input type="radio"/>
Support with modifications	<input checked="" type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

See accompanying letter

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

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Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

See accompanying letter

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed: **Rob Scadding**

Dated: **08.12.2022**



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Sent Via Email

DDNP Consultation
c/o Place Shaping Team
South Norfolk Council
Thorpe Lodge
1 Yarmouth Rd
Thorpe St Andrew
Norwich, NR7 0DU

8 December 2022

Our Ref: 21/6188

Dear Sir / Madam,

Consultation Response – Diss & District Neighbourhood Plan 202-2038

On behalf of our client Aldi Stores Ltd (Aldi), please find enclosed comments in respect of the Regulation 16 consultation stage of the above emerging development plan document.

Aldi currently operate a store in Diss at Mere Street, however, are soon to submit a planning application to relocate approximately 250 metres west to the site known locally as The Feathers Mill Site on Park Road. This site is now vacant and represents a long-standing allocation for mixed use, with Policy DIS 7 of the 2015 South Norfolk Local Plan (SNLP) allocating the site for:

'... retail (non-food goods), leisure, offices (class A2 only), and housing, with any housing only constituting a small (no more than 25% by area) proportion of the site'.

The Feathers Mill Site represents the only remaining retail allocation within Diss, following planning permission being granted for a retirement living scheme on adjacent 'Former Hamlins Factory Site', also allocated for retail (non-food goods), leisure and housing by Policy DIS 6 within the adopted SDLP. Construction work has recently begun at this site, ensuring it will not come forward for a development in conformity with the DIS 6 allocation.

We however observe that Policy DDNP16 of the Regulation 16 Submission Draft of the Neighbourhood Plan conflicts with the above wording of DIS 7, identifying the site as *'... the preferred site for the Diss Leisure Centre'*. Policy DDNP16 states:

'This land amounting to some 2.21ha is allocated for leisure and housing, with any housing only constituting a small (no more than 25% of the area) proportion of the site'.

The above wording includes no reference to 'retail' and is therefore not within *'general conformity with the strategic policies contained in the development plan for the area'*, as required by Schedule 4B, Sub-paragraph (2)(e) of the Town & Country

Managing Director
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Planning Act 1990. When considering the soundness of development plan documents, Paragraph 36 of the NPPF (2021) is clear that non-strategic policies within a Neighbourhood Plan should be tested in terms of: *'the extent to which they are consistent with relevant strategic policies for the area'*.

In the case of draft Policy DDNP16, it is not clear what has led to the direct conflict with Policy DIS 7 though the removal of retail, and the clear shift to identify this site as the *'... preferred site for the new Diss Leisure Centre'*. There is no justification or evidence to support this new policy direction.

It is concerning to note that within the *'Site Options & Assessment 2022 Consolidated Report'*, which includes a Site Assessment Proforma and serves as an evidence base for the current draft of the DDNP, fails to even identify the site as an existing retail allocation within the SNLP. At page 158, it is stated: *'The site meets both emerging and adopted Local Plan policy. The previous Local Plan allocation includes this as a mixed use allocation for employment, leisure and housing. The site appropriate for this allocation to be carried forward in the Neighbourhood Plan'*. This paragraph mis-represents adopted Policy DIS 7 which is clear in including retail.

This is concerning, with paragraph 166 of the draft DDNP stating, this site is: *'highly sustainable as it is within close proximity to the town centre'*, making it even more surprising why the suitability of the site for retail use has so easily been dispensed with. As paragraph 160 identifies: *'Regeneration of this area of Diss is a longstanding ambition that is yet to be realised, despite previous allocations. A strong case for leisure and retail [our emphasis], in this central location, rather than housing, remains'*.

Coupled with DIS 6 not coming forward for retail use, if the current wording for DDNP16 was adopted, there would be no land at all allocated for future expansion of retail within Diss. This would be in direct conflict with the SNLP and contrary to the evidence base prepared to support the new Greater Norwich Local Plan which is currently at Examination stage.

Indeed, the Greater Norwich Town Centres and Retail Study Update (December 2020) identifies short-term capacity for 2,300 sqm net of convenience floorspace specifically identified for Diss itself. With very little opportunity for even a small proportion of this floorspace to be accommodated within the established town centre, there is a continued need to allocate land outside of the town centre to accommodate this need. The deletion of retail from DDNP16 clearly goes against the evidence, with a need to allocate further land for retail rather than less.

Further, having reviewed the evidence base supporting the DDNP, we have identified no detailed justification which would support the need for the site to be identified for a new Leisure Centre, nor evidence of how this would be delivered. Any development for the site is likely to involve costly remediation, in addition to infrastructure costs and the need for a new access from Park Road. There is no indication of how a Leisure Centre scheme alongside a small proportion of residential could fund such works, raising the risk that the current wording could restrict a viable scheme from coming forward.

We consider a hearing should be held in respect of draft Policy DDNP16 in order any evidence supporting the current wording can be suitably probed and justification for the exclusion of retail can be fully understood.

Should you wish to discuss the above representations, please do not hesitate in contacting the undersigned.

Yours sincerely,

Rob Scadding

Associate

Planning Potential

London Office



Consultation Response Form

Diss & District Neighbourhood Plan 2021 - 2038

Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

Diss Town Council have submitted a Neighbourhood Plan (the 'DDNP') to South Norfolk Council and Mid Suffolk District Council. The Plan, which covers the Town and several surrounding parishes sets out a vision for the area and contains policies which it intends will be used to help determine planning applications where relevant. The submitted plan etc. can be found online at:

- www.southnorfolkandbroadland.gov.uk/ddnp
- www.midsuffolk.gov.uk/DissandDistrictNP

Printed copies of the DDNP have also been deposited at the following locations, where they can be viewed on request during normal opening hours:

- **Brome & Oakley Village Hall**, The Street, Brome, IP23 8AE (Contact Parish Clerk to arrange viewing –07554 733621)
- **The Burston Crown**, Mill Rd, Burston, Diss IP22 5TW (Open 12:00-22:30 Wed-Sat)
- **Diss Library**, Church Street, Diss, IP22 4DD
- **Diss Town Hall**, 11-12 Market Hill, Diss, IP22 4JZ
- **Roydon - St. Remigius Church**, Roydon, Diss IP22 5RG
- **Scole Village Stores**, Assett House, The St, Scole, Diss IP21 4DR
- **Stuston - Place Farm Shop**, Place Farm, Old Bury Rd, Stuston, IP21 4AD
- **South Norfolk Council – The Octagon**, 40 Mere Street, Diss, Norfolk, IP22 2AH

HOW TO SUBMIT YOUR COMMENTS

All comments on this Plan must be submitted in writing and be received by no later than **4:00pm on Friday 16 December 2022**.

- **Complete Section One** in full so that your representation(s) can be considered at the Examination stage.
- **Complete Section Two**, identifying which paragraph / policy your comments relate to. You may comment on more than one part of the Plan but must make this clear. Use separate forms if necessary.
- **E-mail your comments to:** neighbourhoodplans@southnorfolkandbroadland.gov.uk
- **Post your comments to:** DDNP Consultation, c/o Place Shaping Team, South Norfolk Council, Thorpe Lodge, 1 Yarmouth Road, Thorpe St. Andrew, Norwich, NR7 0DU

It will not be possible to accept late representations

At the end of the consultation period, all comments received will be collated and then be forwarded on to the appointed Examiner. You should not assume that there will be further opportunities to introduce new information, although the Examiner may choose to seek clarity on certain matters.

Data Protection: All information collected and processed by South Norfolk Council and Mid Suffolk District Council at this stage is by virtue of our requirement under the N'hood Planning (General) Regulations 2012. All comments received will be made publicly available and may be identifiable by name / organisation. All other personal information will be protected in accordance with the Data Protection Act 2018. For more information on how we do this and your rights with regards to your personal information, and how to access it, please visit our websites or contact us at data.protection@southnorfolkandbroadland.gov.uk (SNC) or at customer.services@baberghmidsuffolk.gov.uk (MSDC).

<https://www.southnorfolkandbroadland.gov.uk/data-protection/south-norfolk-council-data-protection>

<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

For Office use only:

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	Mr Richard Holland
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	
Postcode:	
Tel No:	
E-mail:	

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

For Office use only:

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	155	Policy No.	6.8
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input checked="" type="radio"/>	Oppose	<input type="radio"/>
Support with modifications	<input type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

Relating to the allocations and settlement boundary for Palgrave, Paragraph 155 and Map 12 on page 54 of the DDNP are correct and consistent with DDNP and local council policy.

However, the supporting document Parish Allocation and Assets Map for Palgrave is incorrect and shows an out of date version of the Palgrave settlement boundary that is inconsistent with DDNP and local council policy and does not reflect development in the village over the last 20 years.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

The supporting document Parish Allocation and Assets Map for Palgrave should be updated to show the correct, up to date settlement boundary.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

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I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed: Richard Holland	Dated: 10/12/2022
--------------------------------	--------------------------



Consultation Response Form

Diss & District Neighbourhood Plan 2021 - 2038

Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

Diss Town Council have submitted a Neighbourhood Plan (the 'DDNP') to South Norfolk Council and Mid Suffolk District Council. The Plan, which covers the Town and several surrounding parishes sets out a vision for the area and contains policies which it intends will be used to help determine planning applications where relevant. The submitted plan etc. can be found online at:

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- www.midsuffolk.gov.uk/DissandDistrictNP

Printed copies of the DDNP have also been deposited at the following locations, where they can be viewed on request during normal opening hours:

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- **The Burston Crown**, Mill Rd, Burston, Diss IP22 5TW (Open 12:00-22:30 Wed-Sat)
- **Diss Library**, Church Street, Diss, IP22 4DD
- **Diss Town Hall**, 11-12 Market Hill, Diss, IP22 4JZ
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- **Stuston - Place Farm Shop**, Place Farm, Old Bury Rd, Stuston, IP21 4AD
- **South Norfolk Council – The Octagon**, 40 Mere Street, Diss, Norfolk, IP22 2AH

HOW TO SUBMIT YOUR COMMENTS

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- **Complete Section One** in full so that your representation(s) can be considered at the Examination stage.
- **Complete Section Two**, identifying which paragraph / policy your comments relate to. You may comment on more than one part of the Plan but must make this clear. Use separate forms if necessary.
- **E-mail your comments to:** neighbourhoodplans@southnorfolkandbroadland.gov.uk
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It will not be possible to accept late representations

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<https://www.southnorfolkandbroadland.gov.uk/data-protection/south-norfolk-council-data-protection>

<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

For Office use only: DD-020

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	Mr Christopher Dooley
Job Title (if applicable):	n/a
Organisation / Company (if applicable):	n/a
Address:	
Postcode:	
Tel No:	
E-mail:	

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

For Office use only:

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	6.5 ALLOCATION IN BURSTON	Policy No.	DDNP9
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input type="radio"/>	Oppose	<input checked="" type="radio"/>
Support with modifications	<input type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

I object wholeheartedly to the identification of Land West of Gissing Road, as suitable for development on the scale identified in the DDNP. A development on this proposed scale (25x houses) is completely out of proportion for the village. We have very limited amenities in Burston and no practical public transport, the new residents will be entirely dependent on private vehicles. I note the site was supported by fewer than 50% of village residents.

Development of this site will have hugely negative impact on the environment, and on the residents on this side of Burston including impact on listed buildings.

The site supports a rich array of wildlife and benefits from established hedgerows. This development will eat into open countryside, seeing biodiversity and viable agricultural land entirely lost with no prospect of being reclaimed. We suffer high risk of flooding, as seen in December 2020. Concreting over green space on this scale will exacerbate this risk and is entirely incompatible with local and national commitments to combat the climate emergency.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

I fully the urgent need for affordable housing. But housebuilding on this scale should be concentrated in cities or towns such as Diss. Where facilities and employment are easily accessible on foot or by public transport.

I would be very happy to see suitable new developments in Burston, including on this site, but they should be far smaller than 25x houses and distributed around Burston and Shimpling in a manner that helps maintain character of the villages.

Traffic calming measures in Burston and a safe cycle route from Burston to Diss would be very welcome and should be a mandatory infrastructure commitment of any new development.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

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I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed: **Chris Dooley**

Dated: **12.12.2022**



Consultation Response Form

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<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

For Office use only: DD-021

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	Mr Tim Holt-Wilson
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	
Postcode:	
Tel No:	
E-mail:	

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

For Office use only:

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	15 and 17
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input checked="" type="radio"/>	Oppose	<input type="radio"/>
Support with modifications	<input type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

This Neighbourhood Plan is the result of much detailed work and public input over several years. It is a valuable document allowing residents to help shape the development in the seven parishes.

In particular it makes provision for designation of cherished green sites as Local Green Space (section 9) for example Parish Fields in Diss and Hall Meadows in Stuston which need protection from speculative housing development. It also contributes to the designation of valuable green corridors within the landscape which allow birds, bats and other creatures to circulate and hence contributing to ecological resilience.

It allows overlooked cultural heritage to be included in planning thinking through NDHA status (section 11) (examples include 127-133 Victoria Road in Diss and four C18th milestones in Scole). and hence their valuation as assets to the community.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

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The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed: **Tim Holt-Wilson**

Dated: **14-12-2022**



DDNP Consultation c/o Place Shaping Team
South Norfolk Council
Thorpe Lodge 1 Yarmouth Road
Thorpe St Andrew
Norwich
NR7 ODU

12th December 2022

Dear Sirs

DDNP South Norfolk Regulation 16 Consultation, Diss and District Neighbourhood Plan responses to South Norfolk District Council document:

Agenda Item: Cabinet 26/09/2022 DISS & DISTRICT NEIGHBOURHOOD PLAN SUBMISSION
Report Author(s): Richard Squires Senior Community Planning Officer 01603 430637
richard.squires@southnorfolkandbroadland.gov.uk

Response 1- 6. Delivering Growth:

We believe that the query on there being 122 new homes within existing commitments goes back to when we were trying to reconcile numbers with the GNLP and included the listed sites from the previous plan less completions that had occurred since the GNLP was launched. I think for clarity it is better to exclude the 122 figure and deal with individual carried over site policies independently especially as we were asked to reassess all carried over sites due to the extensive period since they last assessed by South Norfolk District Council. This inevitably led to some variations in recommended site numbers.

Policy DIS1 (DDNP7), Land amounting to some 1.18 hectares is allocated for housing. The original allocation said it could accommodate approximately 35 dwellings. However, when the site was reassessed at the request of SNDC, AECOM found that dense tree cover to the east of the site was important and should be retained, on the basis of its ecological value and function as a noise buffer (See AECOM comments below). However, this means the numbers should be reduced to 10.

However, we acknowledge the GNLP comments that a capacity of 14 homes was mentioned on the SOA on page 14 and we agree to amend the 10 to **14**.

Table 3 Summary of Site Assessment

Site Ref.	Site Name	Area (Ha)	2022 Neighbourhood Plan Site Assessment Summary	Assessment of suitability for allocation
DIS1	Land North of Vince's Road	1.18	<p>To be read in conjunction with Appendix C</p> <p>This is a greenfield site located to the north east of the town, adjacent to the railway line. The south eastern part of the site has dense tree cover and would not be appropriate to develop, this would therefore reduce the potential development area on the site. The proximity to the railway line may also be a constraint; however, due to tree coverage along the railway and the development to the north which has been built up to the edge of the railway, this is unlikely to reduce the developable area further. This site meets both emerging and adopted Local Plan policy. Vehicular access could be provided from Prince William Way. The previous Local Plan allocation for housing is appropriate to carry forward for allocation in the Neighbourhood Plan; however, the development potential is likely to be reduced to around 10 dwellings to allow for retention of the trees.</p>	Suitable for development of 10 dwellings

An Outline planning application has been submitted for 39 dwellings planning allocation number 2022/1344 on this site.



The Plan above shows the dense tree cover to the South East of the site which is why AECOM recommended numbers be cut from 35 to 10 (14).

Policy DIS2 (DDNP15) – Land off Park Road mainly for green space/ leisure and a riverside walk with **10/15** enabling dwellings to allow purchase of the land. This Policy has been left unchanged to the last local plan and will be actioned when DIS7 is developed in 2023/4 as this will provide the access to DIS2

Policy DIS3 (DDNP6)– Land off Denmark Lane 1.6 ha, original policy 42 dwellings. This site has two planning application pending 2022/1975 and 2022/1976 for a total of 53 dwellings.

After site reassessment by AECOM this was reduced to **25** by the DDNP.

We accept the principle of development is established on this site as outlined in the Local Plan Policy DIS3 and indeed the Diss and District Neighbourhood Plan (DDNP6) policy which is currently at the examination stage.

There is landscaped boundary belt in the existing policy DIS3 which was specified to maintain the strategic gap between Diss and Roydon. The Provision of landscaping along the western boundary is to provide a clear visual demarcation (soft Border) between the edge of Diss and the defined strategic gap as set out in Policy 14.

The site has a significant slope from north to south which will requires a large SUDS basin or attenuation.

The DDNP6 policy has taken a similar theme to DIS3. However, the effective site area is much reduced when the boundary belt and the need for a larges SUDS basin is taken into account to leaving an effective area of around 1 ha.

Policy DIS6 – Land behind the Thatcher's Needle was granted planning permission after an appeal earlier this year and is now in build. This land was originally allocated for mixed development for leisure, residential and offices A2 which both town and district councils supported. Planning permission was given for **73 dwellings** (C3)

Policy DIS7 (DDNP16) – Former Feather Factory on Park Road. Purchased by Howard Home Ltd who applied for planning permission to use the existing buildings for storage, Application number 2022/2075 change of class from B2 to B8. We also know that an option has been taken on part of this site for a new supermarket to be built in 2023. The policy permits for non-food retail, Leisure, offices class 2 only and housing (**16 dwellings**) to be a small part to a max of 2.13 ha. This is the Town Councils and residents preferred site for a new Leisure Centre

Response 2, Policy 1 Scale and location of housing.

As can be seen from comments above in Response 1-6 we pro-actively work with developers where possible and this will continue.

Response 3, Policy DDNP1.

We have been working with the developer to improve connectivity to pedestrian links. The developer has already added these at our request to his outline planning application 2021/2782 and we have a good working relationship with them.

Response 4, Policy DDNP4.

This site was previously employment land and was reallocated by the DDNP for housing. Its proximity to the Ensign Way estate means it would be fairly easy to integrate it into the estate. SNC are now saying they did not agree to this change from employment to housing which is rather surprising given the number of conversations we have had. Originally, we allocated this site for 25 homes although we have since had approaches from developers to build 6-8 self-build homes.

We feel that there is adequate employment land at DIS 8, 9 and 10 and that with further employment land opportunities at DIS7 and possibly GNLP0102 that this land should be released for housing.

South Norfolk District Council say whilst accepting that (with residential development or proposed allocation to the north and east of the site) a residential use of the site would not be inappropriate in general terms, the site would, however, also be appropriate for employment uses of a type consistent with the neighboring residential development

We have already lost a mixed development site at DIS6, and if SNDC feel there is now insufficient employment land that there is an opportunity to release some land from the GNLP site allocation GNLP0102 to compensate for this without affecting the site numbers by very many.

Response 5. Policy DDNP5 Land north of Nelson Road with planning permission 2020/0478 for 77 apartments and work on imposed conditions has commenced on site.

We fully accept your comments that this is commercial development, it is Use Class C2 (residential institutions) and therefore is considered to meet a residential need. The equivalent number of dwellings we can equate to this is 43, a ratio of 1:1.8, in accordance with national Planning Practice.

Response 6. Policy DDNP6.

See Policy DIS 3. (DDNP6) above

Response 7. Policy DDNP7.

See Policy DIS1 (DDNP7) above which covers the points raised SNC.

Response 8. Policy 15. Local Green Space.

South Norfolk Council object to Diss High School playing fields being identified as LGS. SNDC are very concerned that that a LGS designation would prevent further expansion of the school. They point out that recent NP's at Taverham and Redenhall have had school playing fields removed from LGS due to concerns about school expansion. We accept the comments of SNC and agree to this item being removed if it is subject to any uses being for school expansion only. They also say that that Leisure facilities may not be deliverable in the Waveney Quarter (WQ) and that any restriction on Diss High School may impact their ability to deliver Leisure provision. We strongly

believe that Leisure provision can be delivered in the Waveney quarter and are in talks with all the stake holders on this project and have even asked SNDC to carry out feasibility studies.

In addition, we strongly believe Diss High School is not the right location for a Leisure Centre for a number of reasons:

- It is in the north east of the town and quite inaccessible to most without their own transport. *The WQ is close to rail and bus stations! (Less than 100m from Bus terminus). The WQ is also within 1KM of anywhere in the town centre*
- There is no local transport links to the high school other than school buses at the beginning and end of the school day.
- To expect younger children and the elderly to walk from the bus terminus will probably not happen. *It is quite an undulating route, hilly in places and is a full 1.7km by the shortest route from the bus station.*
- The Town Council believes the High School would be inaccessible to many people marginalising their ability to use the centre.

Finally, our surveys show that the communities preferred location for Leisure is the Park Road/ Waveney Quarter and not Diss High School.

Yours Sincerely



Eric Taylor on behalf of the:

DISS AND DISTRICT NEIGHBOURHOOD PLAN

c/o Diss Town Council
11-12 Market Hill
Diss, Norfolk, IP22 4JZ

contact@ddnp.info

12th December 2022

Date: 15 December 2022
 Enquiries to: Georgia Teague
 Tel: 01473 265054
 Email: georgia.teague@suffolk.gov.uk
neighbourhoodplanning@suffolk.gov.uk



Broadland District Council & South Norfolk Council
 Thorpe Lodge
 1 Yarmouth Road
 Norwich
 Norfolk, NR7 0DU

Dear Mr Richard Squires,

Submission Consultation version of the Diss and District Neighbourhood Plan

Thank you for consulting Suffolk County Council (SCC) on the Submission Consultation version of the Diss and District Neighbourhood Plan.

SCC welcome the changes made to the plan in response to comments made at the Reg. 14 pre-submission consultation stage.

As this is the submission draft of the Plan the County Council response will focus on matters related to the Basic Conditions the plan needs to meet to proceed to referendum. These are set out in paragraph 8(2) Schedule 4B to the Town and Country Planning Act. The basic conditions are:

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan
- b) the making of the neighbourhood plan contributes to the achievement of sustainable development.
- c) the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)
- d) the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.

Whilst not strictly a matter for the Basic Conditions, we note that Policy 15 states that the Local Green Spaces are displayed in Maps 12-18.

However, the maps below the policy are labelled as Maps 21-27. Some (but not all) other policies also refer to incorrect map numbers, such as Policy 8 Green Corridors refers to Map 13, but is followed by Map 17.

This will need to be corrected in the final version of the plan, to ensure accuracy and clarity to the reader.

We thank the neighbourhood planning group for considering the changes we have proposed. We have no further comments to make, and wish to be kept updated with the progress of this plan.

If there is anything that I have raised that you would like to discuss, please use my contact information at the top of this letter.

Yours sincerely,

Georgia Teague
Planning Officer
Growth, Highways, and Infrastructure



Consultation Response Form

Diss & District Neighbourhood Plan 2021 - 2038

Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

Diss Town Council have submitted a Neighbourhood Plan (the 'DDNP') to South Norfolk Council and Mid Suffolk District Council. The Plan, which covers the Town and several surrounding parishes sets out a vision for the area and contains policies which it intends will be used to help determine planning applications where relevant. The submitted plan etc. can be found online at:

- www.southnorfolkandbroadland.gov.uk/ddnp
- www.midsuffolk.gov.uk/DissandDistrictNP

Printed copies of the DDNP have also been deposited at the following locations, where they can be viewed on request during normal opening hours:

- **Brome & Oakley Village Hall**, The Street, Brome, IP23 8AE (Contact Parish Clerk to arrange viewing –07554 733621)
- **The Burston Crown**, Mill Rd, Burston, Diss IP22 5TW (Open 12:00-22:30 Wed-Sat)
- **Diss Library**, Church Street, Diss, IP22 4DD
- **Diss Town Hall**, 11-12 Market Hill, Diss, IP22 4JZ
- **Roydon - St. Remigius Church**, Roydon, Diss IP22 5RG
- **Scole Village Stores**, Assett House, The St, Scole, Diss IP21 4DR
- **Stuston - Place Farm Shop**, Place Farm, Old Bury Rd, Stuston, IP21 4AD
- **South Norfolk Council – The Octagon**, 40 Mere Street, Diss, Norfolk, IP22 2AH

HOW TO SUBMIT YOUR COMMENTS

All comments on this Plan must be submitted in writing and be received by no later than **4:00pm on Friday 16 December 2022**.

- **Complete Section One** in full so that your representation(s) can be considered at the Examination stage.
- **Complete Section Two**, identifying which paragraph / policy your comments relate to. You may comment on more than one part of the Plan but must make this clear. Use separate forms if necessary.
- **E-mail your comments to:** neighbourhoodplans@southnorfolkandbroadland.gov.uk
- **Post your comments to:** DDNP Consultation, c/o Place Shaping Team, South Norfolk Council, Thorpe Lodge, 1 Yarmouth Road, Thorpe St. Andrew, Norwich, NR7 0DU

It will not be possible to accept late representations

At the end of the consultation period, all comments received will be collated and then be forwarded on to the appointed Examiner. You should not assume that there will be further opportunities to introduce new information, although the Examiner may choose to seek clarity on certain matters.

Data Protection: All information collected and processed by South Norfolk Council and Mid Suffolk District Council at this stage is by virtue of our requirement under the N'hood Planning (General) Regulations 2012. All comments received will be made publicly available and may be identifiable by name / organisation. All other personal information will be protected in accordance with the Data Protection Act 2018. For more information on how we do this and your rights with regards to your personal information, and how to access it, please visit our websites or contact us at data.protection@southnorfolkandbroadland.gov.uk (SNC) or at customer.services@baberghmidsuffolk.gov.uk (MSDC).

<https://www.southnorfolkandbroadland.gov.uk/data-protection/south-norfolk-council-data-protection>

<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

For Office use only:

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	Mr Geoff Armstrong
Job Title (if applicable):	Director
Organisation / Company (if applicable):	Armstrong Rigg Planning
Address:	The Exchange Colworth Science Park Sharnbrook Bedford
Postcode:	MK44 1LZ
Tel No:	01234 867135
E-mail:	geoff.armstrong@arplanning.co.uk

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	Orbit Homes
Address:	c/o Agent
Postcode:	
Tel No:	c/o Agent
E-mail:	c/o Agent

For Office use only:

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	
----------------------	--	-------------------	--

Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input type="radio"/>	Oppose	<input type="radio"/>
Support with modifications	<input checked="" type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

See covering letter

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

See covering letter

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed: 	Dated: 16/12/22
---	------------------------

Ref: GA/DJ/04821/L0003

16th December 2022

Sent by email to: neighbourhoodplans@southnorfolkandbroadland.gov.uk

DDNP Consultation, c/o Place Shaping Team
South Norfolk Council
Thorpe Lodge
1 Yarmouth Road
Thorpe St. Andrew
Norwich
NR7 0DU

Dear Sir / Madam,

**Representations to the Diss and District Neighbourhood Plan 2021 - 2038
Regulation 16 Consultation
On behalf of Orbit Homes**

On behalf of our client, Orbit Homes, we are pleased to make representations to the Diss and District Neighbourhood Plan (henceforth 'DDNP') Regulation 16 Consultation. We previously made representations to the Regulation 14 Consultation in August 2021 and Major Modifications Regulation 14 Consultation in May 2022 supporting the re-allocation of our client's site at Flowerdew Meadow, Scole (Policy DDNP10), but raising an objection to this allocation with respect to the number of dwellings proposed and the requirement for an alternative construction access through Land east of Norwich Road (Policy DDNP11).

We set out below our representations to the current consultation and enclose the required consultation form.

About Orbit Homes

Orbit's vision is simple - they lead in building thriving communities. They believe everyone is entitled to a good quality home that they can afford in a place that they are proud to live. Orbit was established in 1967 to tackle homelessness and five decades on, they are one of the largest builders of affordable homes in the country. Their aim is to ensure the homes they provide and the places they create are good quality, affordable and safe. They are a commercial organisation with a strong social purpose and they reinvest their profits from market homes delivered to improve the quality of their homes and services.

Representations

Policy DDNP10: Flowerdew Meadow, Scole

Our client supports the proposed allocation of land at Flowerdew Meadow, Scole by Policy DDNP10, but considers that more efficient use could be made of the site by allocating it for 35 instead of 25 dwellings.

We are pleased to note that the previous requirement for an alternative construction access that would have ransomed the site has been removed from the policy. We support the more reasonable requirement now proposed at criteria a) for vehicular access onto Norwich Road to be delivered through DDNP10, unless satisfactorily demonstrated this is unfeasible, and in this case for vehicular access to be provided to the boundary with the adjoining site. Orbit supports this criteria, subject to:

- The wording being corrected to read 'DDNP11' due to the policy number changes between the Reg 14 and Reg 16 drafts; and
- The application of a similar criteria on the development of Policy DDNP11 for access up to the boundary of the two sites. We note that such a criteria is proposed which we support.

Orbit Homes support criteria b) that requires a Construction Management Plan to demonstrate how the impacts of construction traffic on existing residents of Flowerdew Meadow will be mitigated.

With respect to the scale of development, as set out in our previous representations, NPPF Paragraph 124 requires planning policies to support development that makes efficient use of land, whilst taking into account the desirability of maintaining an area's prevailing character. We set out in our previous representations that the local character is one of mixed densities with examples of both inefficient post-war housing that barely achieves 15 dwellings per hectare (dph) and some higher density development such as the more recent development off Comber Close and Pretty Drive which achieves 45 dph. In this respect, and especially given that with the addition of Policy DDNP11 our client's site will no longer be on the settlement edge, we consider that 35 dwellings at a density of c.35 dph would be appropriate on the site. We consider that the policy would be improved by allowing up to 35 dwellings on this 1 hectare site. This would ensure that the amount of greenfield land required to meet the housing requirement (e.g. on the adjoining Policy DDNP11 which doesn't relate as positively to the settlement boundary) is limited to that which is strictly required and therefore that the DDNP achieves sustainable development and meets the basic conditions.

Policy DDNP11: Land east of Norwich Road, Scole

Orbit Homes supports the requirement at criteria d) for vehicular access to the site boundary with Flowerdew Meadow to be provided, subject to the correct reference for Flowerdew Meadow being included (i.e. change from DDNP9 to DDNP10).

Recommended Policy Changes

We recommend the following amendments to Policy DDNP10 and Policy DDNP11:

"POLICY DDNP10

*This 1ha site is allocated for residential development, accommodating approximately ~~25~~ **35** new homes. The development will be expected to address the following specific matters:*

- a) Vehicular access onto Norwich Road will be delivered through the allocated site ~~DDNP10~~ **DDNP11**, unless satisfactorily demonstrated this is unfeasible. Where this is the case, expectation remains that vehicular access will be provided to the boundary with ~~DDNP10~~ **DDNP11** (land east of Norwich Road) which enables connectivity between the two sites; and*
- b) A Construction Management Plan is required as part of the planning application to demonstrate how the impacts of construction traffic on existing residents of Flowerdew Meadow will be mitigated.*

"POLICY DDNP11

This 2.6ha site is allocated for residential development, accommodating approximately 50 new homes. The development will be expected to address the following specific matters:

- a) Include a heritage statement which sets out how the development will mitigate any impacts on nearby listed buildings, including High House, which is located within the vicinity of the site;*
- b) Undertake a noise impact assessment and implement noise attenuation measures as required;*
- c) Deliver traffic calming measures along Norwich Road, including a new pedestrian crossing point to the primary school; and*
- d) Provide vehicular access to the site boundary with ~~DDNP9~~ **DDNP10** (Flowerdew Meadow) which enables connectivity between the two sites.*

We trust that these comments will be given due consideration. If you require any further information then please do not hesitate to contact me.

Yours sincerely



Geoff Armstrong (geoff.armstrong@arplanning.co.uk)

Director

Armstrong Rigg Planning

Direct Line: 01234 867130

Mobile No: 07710 883907



Consultation Response Form

Diss & District Neighbourhood Plan 2021 - 2038

Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

Diss Town Council have submitted a Neighbourhood Plan (the 'DDNP') to South Norfolk Council and Mid Suffolk District Council. The Plan, which covers the Town and several surrounding parishes sets out a vision for the area and contains policies which it intends will be used to help determine planning applications where relevant. The submitted plan etc. can be found online at:

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- **Stuston - Place Farm Shop**, Place Farm, Old Bury Rd, Stuston, IP21 4AD
- **South Norfolk Council – The Octagon**, 40 Mere Street, Diss, Norfolk, IP22 2AH

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<https://www.southnorfolkandbroadland.gov.uk/data-protection/south-norfolk-council-data-protection>

<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

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Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	
Job Title (if applicable):	
Organisation / Company (if applicable):	M Scott Properties Ltd
Address:	c/o Strutt & Parker
Postcode:	
Tel No:	
E-mail:	

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	Strutt & Parker
Address:	66-68 Hills Road Cambridge
Postcode:	CM2 1LA
Tel No:	01223 459493
E-mail:	adam.davies@struttandparker.com

For Office use only:

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	Policy 1 & DDNP1
---------------	--	------------	------------------

Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input checked="" type="radio"/>	Oppose	<input type="radio"/>
Support with modifications	<input checked="" type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

Please see the entirety of Scott Properties comments as set out in full in the accompanying supporting representation. Scott Properties supports the Vision and Aims of the DDNP.

Section 4.3 of the DDNP sets out how the Plan responds to climate change and the key priorities that are woven into its policies, and this is supported. The housing needs assessment set out in Section 6.1 of the DDNP is considered to be a fair reflection of the emerging local housing need, having regard to the combined Plan area, and this is supported.

The inclusion of site DDNP1 in Policy 1 - Scale and Location of Housing Growth is supported, as is the inclusion of site DDNP1 in the Plan, and Policy DDNP1 generally. The site is suitable, available, and deliverable which is evidenced by the current planning application (ref: 2021/2782) which is at an advanced stage and demonstrates that criteria set out in Policy DDNP1 can be delivered, and the conditional contract agreed for the sale of the land to a PLC house builder once outline planning permission has been granted. Scott Properties therefore supports the inclusion of this allocation in the Plan.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

It is considered that Criterion h) of Policy DDNP1 is unreasonable, unjustified and imprecise. As such it should be deleted for the reasons set out in the accompanying representations.

The Framework Plan included at Figure 2 on page 35 of the Plan, while referred as a concept plan and subject to change could be updated to reflect the most up-to-date Framework Plan which has been agreed with Officers as part of the current outline planning application. A copy of the updated Framework Plan is included as Appendix 1 of the accompanying representation.

In respect of the new footway cycle path link to be provided along the northern side of the cemetery extension (criteria e) of Policy DDNP1, while this route is included on Maps 18 and 19 under Policy 10, unlike other proposed improved routes it is not specifically identified as an improvement in the list on page 89. (It is also noted that the title to the key refers to Map 9 rather than Map 18).

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

On the basis that this representation has been prepared to support the Plan and the allocation of the site under Policy DDNP1, it is not considered necessary for a hearing to be held.

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed: Adam Davies	Dated: 15th December 2022
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**DISS AND DISTRICT NEIGHBOURHOOD PLAN 2021-2038
SUBMISSION DRAFT
June 2022**

REGULATION 16 CONSULTATION

DDNP1: Land east of Shelfanger Road and west of Heywood Road

(GNLP Site References: GNLP0342, GNLP0291 and GNLP0250)

**Prepared by Strutt & Parker on behalf of M Scott Properties Ltd
December 2022**

Site Name:	DDNP1: Land east of Shelfanger Road and west of Heywood Road
Client Name:	M Scott Properties Ltd
Type of Report:	Diss and District Neighbourhood Plan Submission Draft, Regulation 16 Consultation 2 nd November 2022 to 16th December 2022 (4.00pm)
Prepared by:	Adam Davies
Checked by:	Client
Date:	December 2022

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Strutt & Parker, 66 – 68 Hills Road, Cambridge, Cambs. CB2 1LA
adam.davies@struttandparker.com
 Tel No: 01223 459438

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1. INTRODUCTION

1.1 This representation has been prepared on behalf of M Scott Properties Ltd (Scott Properties) in response to the publication of the Submission Draft of the Diss and District Neighbourhood Plan (the DDNP). This response is made in respect of Site DDNP1: Land east of Shelfanger Road and west of Heywood Road (the Site).

1.2 This representation should be considered in conjunction with the earlier representations which have been submitted in respect of the Site and also the documents and supporting information which form part of the current planning application, submitted to South Norfolk Council, under application reference 2021/2782 for the following development:

The erection of up to 179 dwellings, 0.64ha of land for the future extension of Diss Cemetery, a new road linking Shelfanger Road and Heywood Road/Burston Road, public open space and associated infrastructure and landscaping at Land East Of Shelfanger Road And West Of Heywood Road, Diss, Norfolk

1.3 Firstly, Scott Properties would like to acknowledge the hard work that the joint Councils and their respective communities have put into producing the Submission Draft Neighbourhood Plan (Regulation 15) June 2022. It is acknowledged that by working together to cover all seven parishes, the DDNP will provide a coordinated and coherent land use planning framework for the area, in line with the strategic development strategy set out in the emerging Greater Norwich Local Plan and emerging Babergh & Mid Suffolk Joint Local Plan, which is to be commended.

1.4 This Regulation 16 consultation is being carried out jointly by South Norfolk Council and Mid Suffolk District Council. It represents the final consultation stage for the DDNP prior to examination by an independent Planning Inspector after which it can go forward for referendum, and assuming continued community support, can be adopted (made).

1.5 The DDNP is supported by a Statement of Basic Conditions, a Consultation Statement and accompanying evidence base made up of the following documents:

- Housing Needs Assessment (HNA)
- Site Options Assessment (SOA) Part 1
- Site Options Assessment (SOA) Part 2
- Site Options Assessment (SOA) Consolidated Report
- Strategic and Environmental Assessment (SEA)
- Habitat Regulations assessment (HRA)
- Design Code

1.6 Those who are submitting representations, are encouraged to complete a consultation response form and submit this via email to either:

www.southnorfolkandbroadland.gov.uk/ddnp, or
www.midsuffolk.gov.uk/DissandDistrictNP

- 1.7 Accordingly, a Form has also been completed and should be read alongside this representation.
- 1.8 This representation focuses only on the policies and content of the DDNP considered relevant to the Site the subject of this representation. The Site was previously proposed as an allocation in the Regulation 18C Consultation Draft of the Greater Norwich Local Plan (GNLP); Local Plan – Part 2 Site Allocations Document; Section 4 - Main Towns, Diss, but was then subsequently omitted in the Regulation 19 consultation version of the GNLP, in order to allow a proportion of the new housing to be allocated in Diss to be deferred to the emerging DDNP.
- 1.9 Scott Properties welcomes and supports the proposed continuation of the allocation of the Site as part of the Submission Draft Plan and its continued inclusion in Policy 1. The amendments and updates which have been introduced through the earlier rounds of consultation in respect of the emerging Neighbourhood Plan are also welcomed.
- 1.10 The Site is suitable, available, and deliverable and will deliver much-needed new market and affordable housing in a sustainable location, as well as facilitating the desired road to link Shelfanger Road with Heywood Road. Accordingly, Scott Properties supports the allocation of site DDNP1. Furthermore, the advanced stage of the current planning application (ref: 2021/2782) and conditional contract for sale of the Site to a PLC housebuilder once outline planning permission has been granted reinforce the deliverability of the Site.

2. POLICY CONTEXT

- 2.1 The “presumption in favour of sustainable development” is at the heart of the National Planning Policy Framework 2021 (NPPF). There is no legal requirement for communities to prepare Neighbourhood Plans, however as set out in paragraph 29 of the NPPF:

‘Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan...’

- 2.2 Once a Neighbourhood Plan is made, it forms part of the statutory Development Plan and as set out in Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning applications have to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 2.3 National planning policy requires Neighbourhood Plans to support the strategic policies contained in Local Plans or spatial development strategies and they should not promote less development than set out in strategic policies for the area. They should contain policies for the development and use of land and while they may include wider community aspirations than those relating to the development of land, these need to be clearly identified and do not form part of the statutory Development Plan.
- 2.4 The Planning Practice Guide indicates that Neighbourhood Plans should be based on proportionate, robust evidence which should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies (Paragraph: 040 Reference ID: 41-040-20160211).
- 2.5 The DDNP Submission Draft has now been published to allow representations to be made before it is submitted for independent examination. As set out in the Planning and Compulsory Purchase Act 2004 the purpose of examination is to consider whether the Neighbourhood Plan complies with the relevant legal requirements and ‘basic conditions’. The basic conditions are set out in paragraph 8(2) of Schedule 4B of the Town & Country Planning Act 1990 (as amended) and can be summarised as follows:
- a) the plan must have regard to national policies and advice;
 - b) the plan must have special regard to the desirability of preserving listed buildings;
 - c) the plan must have special regard to the desirability of preserving or enhancing the character or appearance of conservation areas;
 - d) the plan must contribute to the achievement of sustainable development;
 - e) the plan must be in general conformity with the strategic policies of the development plan;
 - f) the plan must not breach EU obligations; and
 - g) the plan must meet the prescribed conditions in respect of the habitat regulations and environmental impact assessment.

- 2.6 A Statement of Basic Conditions has been published alongside the Submission Draft Plan the content of which is supported by this representation. In respect of the Site, it’s

allocation aligns with the basic conditions and this has been further demonstrated through the current outline planning application. The outline application, and accompanying consultation responses confirm the proposals represent sustainable development and will not have any adverse impacts on the setting of listed buildings, the Conservation Area or other heritage assets. The scheme will not breach EU obligations or cause any harm to the significance of protected habitats that cannot reasonably be mitigated by the Council's RAMS projects. At the strategic level, while progress on the emerging GNLP has been delayed due to the issues around nutrient neutrality, Diss and the Site fall outside of the nutrient neutrality catchment area. Being by far the largest proposed allocation within the DDNP, the Site will make a significant contribution to delivering the minimum 428 new homes to be delivered, reflecting the respective strategies of the emerging GNLP and emerging Babergh & Mid Suffolk Joint Local Plan.

- 2.7 Examination of neighbourhood plans normally follows the written representations procedure, unless the examining inspector considers it necessary to hold a hearing to discuss a particular issue. On the basis that this representation has been prepared to support the Plan and the allocation of the Site under Policy DDNP1, it is not considered necessary for a hearing to be held.

3. THE PLAN

- 3.1 This section of the representation provides comments in respect of only those parts of the DDNP relevant to support of the continued allocation of the Site under Policy 1.

Vision Statement and Ten Aims

- 3.2 Section 4.1 of the DDNP indicates that the Vision is to “*maintain a vibrant community around a thriving market town.*” This Vision is supported. Sustainable development is at the heart of the NPPF (para 10), paragraph 8 goes on to set out the three overarching objectives of sustainable development as: an economic objective; a social objective; and, an environmental objective, which are interdependent and need to be pursued in mutually supportive ways. The 10 aims of the DDNP which support the Vision embrace all three objectives of sustainable development at the local level.
- 3.3 Importantly, the allocation of the Site (Policy DDNP1) clearly aligns with Aims 1,3, 5, 9 and 10, which have been instrumental in the allocation process. The other objectives can be fulfilled as part of the detailed matters associated with any forthcoming reserved matters planning application, coupled with appropriate mitigation measures to be secured at the outline planning permission stage by way of planning obligations and conditions.
- 3.4 Accordingly, Scott Properties supports the Vision and Aims of the DDNP.

Responding to Climate Change

- 3.5 In line with the objectives and provisions of the Climate Change Act 2008, the NPPF indicates that plans should take a proactive approach to mitigating and adapting to effects of climate change. Climate change is one of the greatest challenges that the planning system faces when balancing competing development pressures, in order to secure the fundamental objective of achieving sustainable development; development which meets the needs of the present without compromising the ability of future generations to meet their own needs.
- 3.6 Scott Properties supports Section 4.3 of the DDNP which sets out how the plan responds to climate change and the key priorities that are woven into its policies. In respect of site allocations, the site assessment process has taken into account the locational relationship of the sites, including their access to services. Inclusion of the Site (DDNP1) within the DDNP aligns with this objective. Whilst the Site is located on the edge of the town, it is in a sustainable location, within walking and cycling distance of all the key services and facilities. Furthermore, the current outline application demonstrates that it can also meet the fundamental climate change challenges by addressing matters such as flood risk through the inclusion of an effective surface water drainage strategy, delivering increased pedestrian connectivity across the Site, inclusion of a northern link road which will reduce congestion off-site, delivery of at least 10% biodiversity net gain and also through the construction phase incorporating sustainable design and construction techniques, including EV charging points.

Delivering Growth – Introduction

- 3.7 As set out above, the Site (DDNP1) was previously proposed as an allocation in the Regulation 18C Consultation Draft of the Greater Norwich Local Plan (GNLP); Local Plan – Part 2 Site Allocations Document; Section 4 - Main Towns, Diss, but was then subsequently omitted in Regulation 19 consultation version of the GNLP, in order to allow a proportion of the new housing to be allocated in Diss, to be deferred to the emerging DDNP.
- 3.8 It is one of the basic conditions that neighbourhood plans need to be in conformity with the strategic policies of Local Plans. This is made more complex for the DDNP because it straddles two different local plan areas, the Greater Norwich plan area and also the Babergh and Mid Suffolk area. Both plans are at a reasonably advanced stage, however, they have both stalled at examination so that further work can be undertaken.
- 3.9 The housing requirements set out in the DDNP reflect existing commitments in the respective adopted local plans and include those sites with planning permission as well as the new housing requirements to meet housing need over the plan period. For Diss part of the housing need will be met by the allocation for 150 homes at the Frontier Agriculture site on Sandy Lane in the emerging GNLP. This leaves a minimum requirement for 201 homes to be identified through allocations in the DDNP for the Town of Diss. Clearly, the allocation of site DDNP1 for approximately 180 dwellings will make a very significant and important contribution to meeting this local need.
- 3.10 Scott Properties supports the housing needs assessment set out in Section 6.1 of the DDNP and considers it to be a fair reflection of the emerging local housing need, having regard to the combined plan area.

Policy 1 – Scale and Location of Housing Growth

- 3.11 The approach to the allocation of sites in Policy 1 is reflective of Policy DM 1.3 of the adopted South Norfolk Local Plan which requires development to be located sustainably and seeks to restrict development in the open countryside. The DDNP strategy, while acknowledging the need for greenfield land release to meet local housing needs, has therefore been to allocate sites in sustainable locations on the edge of existing settlements, to supplement the development of brownfield sites.
- 3.12 The Site (DDNP1), performs extremely well against this strategy, being located to the north of the town in a location where built development already extends along the western side of Shelfanger Road and eastern side of Heywood Road. While Diss Cemetery and The St Henry Morse Roman Catholic Church lie to the south and have an open character, they are still an integral part of the developed settlement. On the eastern side of Shelfanger Road, to the north of the Site there is a residential property, beyond which is the Diss Sports Ground. The only boundary which directly abuts the open countryside is the central and eastern side of the northern boundary which is separated by the alignment of the public footpath (FP7/FP26). Accordingly, it is concluded that the Site has many of the characteristics of an infill development and as such performs strongly in terms of the

allocation strategy. This this is evident from inspection of MAP 4: Site allocations in Diss, on page 34 of the DDNP.

- 3.13 Scott Properties strongly supports the inclusion of site DDNP1 in Policy 1 - Scale and Location of Housing Growth.

DDNP1 - Land east of Shelfanger Road and west of Heywood Road

- 3.14 It is noted that the Framework Plan included at Figure 2 on page 35 of the Plan, while referred to as a concept plan and noted to be subject to change at paragraph 103, could be updated. The most up-to-date Framework Plan which has been agreed with Officers as part of the current outline planning application, responds to various matters raised through the statutory consultation process. A copy of the updated Framework Plan can be found at Appendix 1 of this representation.
- 3.15 Paragraph 97 of the DDNP recognises that the allocation of the Site is well related to the character and form of the built-up area of Diss. It also acknowledges that the Site will facilitate an increase in the size of the Cemetery. The current outline application safeguards an area of 0.64ha of land for the future extension of Diss Cemetery. This land will be transferred to the Town Council along with a maintenance contribution to cover its initial use as open space, by way of the Section 106 Agreement.
- 3.16 In earlier versions of the DDNP the approach had been to secure this as a policy requirement, however, the extent of land suggested was not considered to be reasonable or justified, especially having regard to the existing capacity of the Cemetery which is sufficient to meet the burial needs of the community until well beyond the end of this plan period. The removal of a policy requirement for the delivery of this safeguarded land, is welcomed by Scott Properties, however, they are still committed to the delivery of 0.64ha of land, recognising the uniqueness of the Site's relationship with the existing cemetery, providing a one-off opportunity for the long-term safeguarding of land to meet future burial needs. In addition, the Site will provide an area that can be used as public open space until it is needed for burials as an additional community benefit.
- 3.17 It is noted that the Town Council's consultation response dated 11 February 2022 in respect of the current planning application, was to recommend approval. Furthermore, Scott Properties has also had positive dialogue with the Town Council in respect of the future transfer of the proposed cemetery land, its planned use as open space until needed for burials, and the financial arrangements for its maintenance in accordance with the provisions set out in South Norfolk Council's Open Space SPD. Reference to these proposals in the support text to Policy DDNP1 is therefore supported.
- 3.18 The full text of policy DDNP1 is set out below. In order to demonstrate the deliverability of the Site, it is considered useful to undertake and a brief assessment of the current outline planning application (2021/2782) against the respective policy criteria.

POLICY DDNP1

This 8.4ha site is allocated for residential development to accommodate approximately 180 homes. The development will be expected to address the following specific matters:

- a) Three individual sites are included in this allocation and will need a coordinated approach to design, layout, landscaping, infrastructure provision and delivery. A master plan will be required to demonstrate how this will be achieved;**
- b) Design will need to take into account the presence of a high-pressure pipeline located adjacent to the northern boundary of the site;**
- c) A Transport Assessment will be required for the whole site allocation;**
- d) Provision of a link road to connect Heywood Road and Shelfanger Road;**
- e) Development will be designed to include pedestrian and cycle connections that link to the existing network without the need to utilise the new link road;**
- f) Design will need to ensure that parking provision is contained within the site boundaries, so as to ensure that the new link road remains free from parked vehicles. This is essential as the link will become an important strategic east/west route around the town;**
- g) Deliver biodiversity net gain which includes habitat enhancement or creation to link with the nearby green corridors identified in Policy 8 and the adjacent Diss Cemetery County Wildlife Site; and**
- h) The development will incorporate sustainable design and construction principles that maximise potential to achieve net zero carbon emissions and realise sustainability improvements over and above that set by Building Regulations, unless it can be demonstrated that this is not feasible.**

3.19 The application site extends to 8.4 ha and the description of development is for up to 179 dwellings. This is in line with the proposed allocation. A Framework Plan has been prepared for the Site and forms part of the current submission demonstrating a coordinated approach

to design, layout, landscaping, infrastructure provision and delivery as required by criteria a) of the Policy.

- 3.20 An Opportunities and Constraints Plan is included as part of the Design and Access Statement submitted in support of the planning application. This acknowledges the presence of an intermediate pressure gas pipeline located past the northern boundary. None of the statutory consultees have raised any concerns over the presence of this pipeline in their consultation responses to the planning application. A landscape buffer is included along this boundary to assist with the integration of the proposed built development with the countryside beyond. The application is also supported by a Transport Assessment which has been the subject of extensive discussions with Norfolk County Highways. These aspects satisfy the requirements of criteria b) and c).
- 3.21 The planning application has been submitted as an outline application with all matters reserved except for access. Detailed access plans show the respective new junction arrangements to serve the Site from Shelfanger Road in the west and Heywood Road in the east. These new junctions will form the basis of the link road shown to run across the Site on the submitted Framework Plan. The arrangement of these junctions and principle of the provision of a link road have also been the subject of the discussions with Norfolk County Highways. A new cycleway link will be provided along the northern edge of the proposed cemetery extension, connecting Heywood Road in the east with the existing north/south public right of way which links Farthing Close in south with Diss Sports Ground to the north. Other pedestrian links are also proposed providing improved connections within the Site and with the existing highway and rights of way network which surround the Site. Accordingly, it is concluded that the criteria d) and e) are both deliverable.
- 3.22 In respect of the new cycleway link to be provided along the northern side of the cemetery extension, while this route is included on Maps 18 and 19 under Policy 10, unlike other proposed improved routes it is not specifically identified as an improvement in the list on page 89. (It is also noted that the title to the key refers to Map 9 rather than Map 18).
- 3.23 Criterion f) requires that parking provision is contained within the Site boundaries and implies that a restriction should be placed on the parking of vehicles along the proposed link road. These are detailed design matters, and such a parking restriction on an adoptable highway would require implementation through a traffic regulation order. At the reserved matters application stage, it will be necessary that the detailed layout and design reflects the Council's adopted car parking standards, (as required by DDNP Policy 6 – Design) which will require car parking to be delivered clear of the highway, to meet both the needs of residents and visitors.
- 3.24 The delivery of a biodiversity net gain is a requirement of criterion g) which includes habitat enhancement or creation, to link with nearby green corridors and the adjacent Diss Cemetery County Wildlife Site. The current planning application is accompanied by a Biodiversity Impact Assessment which demonstrates the proposed development can deliver at least a 10% overall net gain. Furthermore, the Framework Plan also allows for the creation of a number of green corridors between Diss Cemetery and the countryside to the north of the Site.

3.25 Criterion h) requires:

'The development will incorporate sustainable design and construction principles that maximise potential to achieve net zero carbon emissions and realise sustainability improvements over and above that set by Building Regulations, unless it can be demonstrated that this is not feasible.'

3.26 It is considered that this is an unreasonable and unnecessary criterion to include in Policy DDNP1. Sustainable design and construction requirements need to be considered at the detailed design stage and therefore would more appropriately set out in general design policies such as Policy 6, which requires all developments to minimising energy consumption by means of layout, orientation, massing and landscaping. These requirements are applicable to all allocations in the DDNP. If the purpose of including Criterion h) is to encourage developers to included sustainable design and construction techniques which exceed the requirements of the latest standards, then Policy 6 would be appropriate place to do so.

3.27 The Policy requirement to *'maximise potential to achieve net zero carbon emissions'* is considered to be imprecise and could be interpreted as unreasonably onerous. Maximising potential does not establish a measurable threshold or upper limit which needs to be achieved. Similarly, the test, *'unless it can be demonstrated that this is not feasible'* is also vague. For example, it might be feasible to install solar PV on every roof but this might not be desirable from a design perspective, viable on the basis of cost, or indeed the best solution from a cost benefit basis. However, it would maximise potential and be feasible.

3.28 Furthermore, there is no compelling evidence to justify why these requirements should be applicable to only one site allocation in the Plan. The Planning Practice Guide indicates that local requirements for building's sustainability should be set out in local plans, consistent with the Government's zero carbon buildings policy and based on robust and credible evidence. The Plan does not contain any such compelling evidence.

3.29 The supporting text accompanying DDNP1 explains at Paragraph 101, that the scale of the development provides an opportunity to support the delivery of low carbon infrastructure. This is still the case with other allocation sites within the Plan. The supporting text then refers to Policy 2 of the emerging GNLP which seeks a 19% reduction against Part L of the Building Regulations (2013). It correctly notes that this policy is still subject to examination. Part L of the Building Regulations was updated in June 2022 and as such the 19% reduction target is already out of date, and has been increased to 31% above the 2013 Building Regulations. Further changes are expected in 2025. The Building Regulations are the most appropriate way for the Government's zero carbon buildings policy to be delivered and it is considered inappropriate for the Neighbourhood Plan to suggest that a different threshold should be applied to one particular site, without any demonstrable evidence or justification for doing so. Accordingly, Scott Properties recommend that Criterion h) should be deleted from the Policy DDNP1.

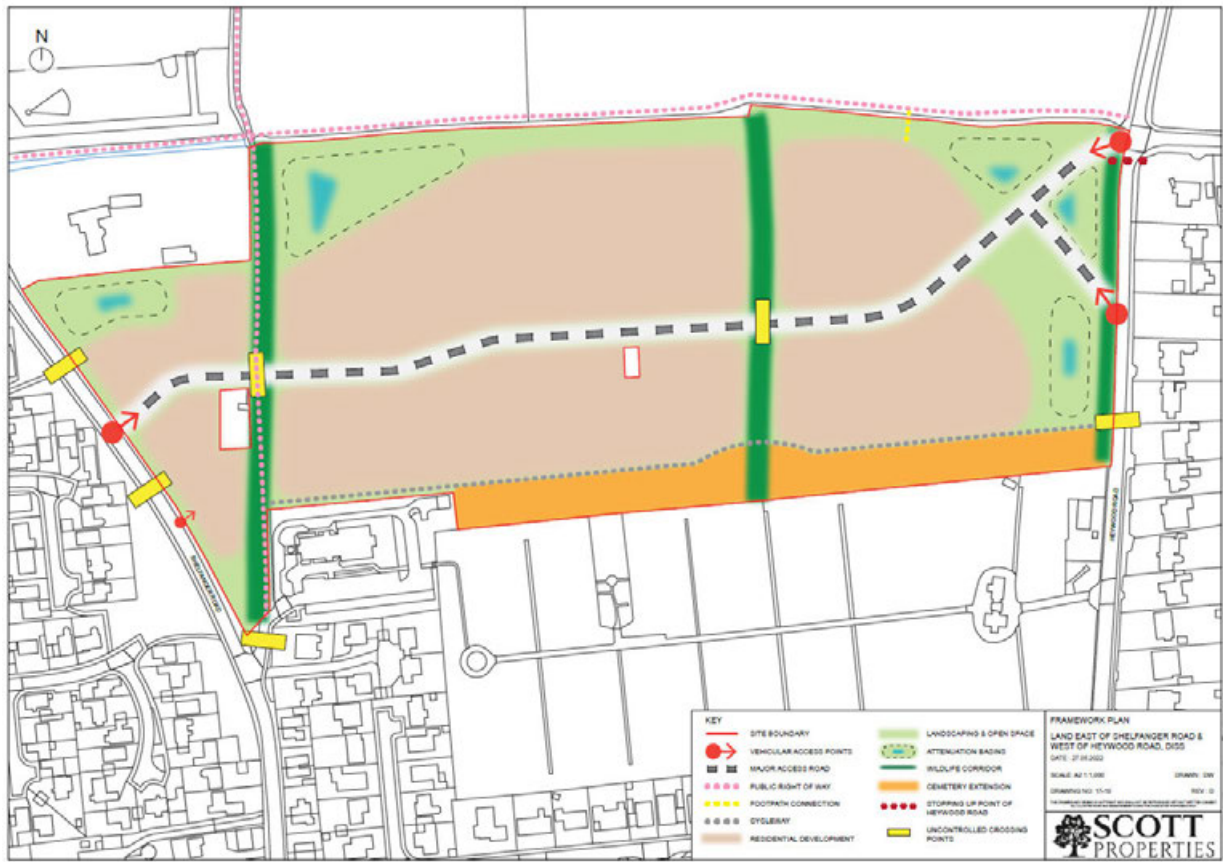
3.30 In summary, the above assessment helps to confirm that the Site (DDNP1) is suitable, available, and deliverable in accordance with the policy criteria contained within the emerging DDNP. It is the largest individual allocation in the DDNP and as such confirmation

of its delivery is of significant importance to the success of the overall strategy of the Plan. The current outline application (2021/2782) further demonstrates this and accordingly it is considered that, subject to the deletion of Criteria h) of Policy DDNP1, the DDNP should be supported at examination, and approved to go forward to referendum.

4 CONCLUSION

- 4.1 Scott Properties welcomes and supports the continued inclusion of DDNP1: Land east of Shelfanger Road and west of Heywood Road in Policy 1 of the DDNP and its allocation as a site of 8.4 ha for residential development to accommodate approximately 180 homes.
- 4.2 It is considered that the Plan establishes an appropriate and sustainable Vision and includes the necessary mechanisms to meet its underlying ten aims. The proposed housing allocations will deliver an appropriate a level of development to meet local need which reflects the strategic policies of the emerging GNLP and Babergh & Mid Suffolk Joint Local Plan.
- 4.3 With the exception of Criterion h) the remaining criteria set out in Policy DDNP1 are considered to be appropriate, reasonable and deliverable. This has been demonstrated through the analysis set out above by way of a comparison with the current outline planning application (2021/2782).
- 4.4 In respect of Criterion h), it is considered that as worded it is imprecise and unnecessarily onerous. Its objectives will be better delivered through the Building Regulations and the general design policies contained in the development plan. Accordingly, Scott Properties recommend Criterion h) for deletion from Policy DDNP1.
- 4.5 The removal of a specific policy requirement for the inclusion of safeguarded land for a cemetery extension is welcomed by Scott Properties. However, they are pleased to confirm the commitment to the delivery of 0.64ha of land, recognising the uniqueness of the Site's relationship with the existing cemetery, providing a one-off opportunity for the long-term safeguarding of land to meet future burial needs. In addition, this will provide an area that can be used as public open space until it is needed for burials. As part of the current planning application, positive discussions have been held with Diss Town Council, to ensure these objectives along with appropriate maintenance contributions will be delivered as part of the S106 Planning Obligations.
- 4.6 For the reasons set out above it is considered that subject to the deletion of Criterion h) from Policy DDNP1, the Neighbourhood Plan complies the relevant legal requirements and 'basic conditions' and as such should be recommended for approval at referendum, following successful examination.

5 APPENDIX A – Updated Framework Plan





Consultation Response Form

Diss & District Neighbourhood Plan 2021 - 2038

Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

Diss Town Council have submitted a Neighbourhood Plan (the 'DDNP') to South Norfolk Council and Mid Suffolk District Council. The Plan, which covers the Town and several surrounding parishes sets out a vision for the area and contains policies which it intends will be used to help determine planning applications where relevant. The submitted plan etc. can be found online at:

- www.southnorfolkandbroadland.gov.uk/ddnp
- www.midsuffolk.gov.uk/DissandDistrictNP

Printed copies of the DDNP have also been deposited at the following locations, where they can be viewed on request during normal opening hours:

- **Brome & Oakley Village Hall**, The Street, Brome, IP23 8AE (Contact Parish Clerk to arrange viewing –07554 733621)
- **The Burston Crown**, Mill Rd, Burston, Diss IP22 5TW (Open 12:00-22:30 Wed-Sat)
- **Diss Library**, Church Street, Diss, IP22 4DD
- **Diss Town Hall**, 11-12 Market Hill, Diss, IP22 4JZ
- **Roydon - St. Remigius Church**, Roydon, Diss IP22 5RG
- **Scole Village Stores**, Assett House, The St, Scole, Diss IP21 4DR
- **Stuston - Place Farm Shop**, Place Farm, Old Bury Rd, Stuston, IP21 4AD
- **South Norfolk Council – The Octagon**, 40 Mere Street, Diss, Norfolk, IP22 2AH

HOW TO SUBMIT YOUR COMMENTS

All comments on this Plan must be submitted in writing and be received by no later than **4:00pm on Friday 16 December 2022**.

- **Complete Section One** in full so that your representation(s) can be considered at the Examination stage.
- **Complete Section Two**, identifying which paragraph / policy your comments relate to. You may comment on more than one part of the Plan but must make this clear. Use separate forms if necessary.
- **E-mail your comments to:** neighbourhoodplans@southnorfolkandbroadland.gov.uk
- **Post your comments to:** DDNP Consultation, c/o Place Shaping Team, South Norfolk Council, Thorpe Lodge, 1 Yarmouth Road, Thorpe St. Andrew, Norwich, NR7 0DU

It will not be possible to accept late representations

At the end of the consultation period, all comments received will be collated and then be forwarded on to the appointed Examiner. You should not assume that there will be further opportunities to introduce new information, although the Examiner may choose to seek clarity on certain matters.

Data Protection: All information collected and processed by South Norfolk Council and Mid Suffolk District Council at this stage is by virtue of our requirement under the N'hood Planning (General) Regulations 2012. All comments received will be made publicly available and may be identifiable by name / organisation. All other personal information will be protected in accordance with the Data Protection Act 2018. For more information on how we do this and your rights with regards to your personal information, and how to access it, please visit our websites or contact us at data.protection@southnorfolkandbroadland.gov.uk (SNC) or at customer.services@baberghmidsuffolk.gov.uk (MSDC).

<https://www.southnorfolkandbroadland.gov.uk/data-protection/south-norfolk-council-data-protection>

<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

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Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	Ms Jane Chard
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	
Postcode:	
Tel No:	
E-mail:	

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

For Office use only:

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	110 / 166-169	Policy No.	DDNP3 / DDNP16
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input type="radio"/>	Oppose	<input type="radio"/>
Support with modifications	<input checked="" type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

I support the development of site DDNP3 (Diss Leisure Centre) for housing only if a new Leisure Centre has been built as indicated in para 110. I support the proposed development of the new Leisure Centre in DDNP16 (paras 166-169).

I have received a consultation document from Aldi, which indicates that they are considering a planning application for a larger store in DDNP16. If there is space for both developments, that is fine. If there is space for only one, I support the development of the new Leisure Centre in DDNP16, preference should be given to this. Leisure centres are valuable community assets for encouraging and maintaining fitness and wellbeing of local people and DDNP16 would be a convenient and suitable location.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

Only permit housing development on DDNP5 if a new leisure centre has been created preferably at DDNP16. Preference should be given to a new leisure centre in DDNP16 rather than a new Aldi store if space does not allow for development of both.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed: **Jane Chard**

Dated: **15/12/22**



Consultation Response Form

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<https://www.southnorfolkandbroadland.gov.uk/data-protection/south-norfolk-council-data-protection>

<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

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Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	Chris Smith
Job Title (if applicable):	Development Planner
Organisation / Company (if applicable):	Hopkins Homes Limited
Address:	Melton Park House Scott Lane Melton Woodbridge Suffolk IP12 1TJ
Postcode:	IP12 1TJ
Tel No:	01394 446914
E-mail:	

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	4
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input type="radio"/>	Oppose	<input checked="" type="radio"/>
Support with modifications	<input type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

Whilst noting and broadly concurring with the policy desire that all residential development proposals should provide a mix of housing types, the evidence to support the particular requirement for additional one-bedroomed dwellings appears weak. The Housing Needs Assessment of July 2019 undertaken to support the Plan appears to indicate that overall, through the lifespan of the Plan, the greater need will be for three, four and five-bedroomed dwellings.

It should be noted that one-bedroomed dwellings are disproportionately more expensive to build and less efficient in their ground-coverage than two-bedroomed dwellings, hence why traditionally two-bedroomed dwellings represent the ' entry-level ' for the majority of households

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

Amend Policy to reflect above comments.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

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I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed: **Chris Smith**

Dated: **14/12/2022**



Consultation Response Form

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- **Stuston - Place Farm Shop**, Place Farm, Old Bury Rd, Stuston, IP21 4AD
- **South Norfolk Council – The Octagon**, 40 Mere Street, Diss, Norfolk, IP22 2AH

HOW TO SUBMIT YOUR COMMENTS

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- **E-mail your comments to:** neighbourhoodplans@southnorfolkandbroadland.gov.uk
- **Post your comments to:** DDNP Consultation, c/o Place Shaping Team, South Norfolk Council, Thorpe Lodge, 1 Yarmouth Road, Thorpe St. Andrew, Norwich, NR7 0DU

It will not be possible to accept late representations

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<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

For Office use only: DD-028

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	Chris Smith
Job Title (if applicable):	Development Planner
Organisation / Company (if applicable):	Hopkins Homes Limited
Address:	Melton Park House Scott Lane Melton Woodbridge Suffolk IP12 1TJ
Postcode:	IP12 1TJ
Tel No:	01394 446914
E-mail:	

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	5
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input type="radio"/>	Oppose	<input checked="" type="radio"/>
Support with modifications	<input type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

Whilst noting the desired policy focus towards the ' social rent ' tenure, this appears to be at odds with Government Guidance within the NPPF, which requires at least 10% of all affordable housing to be provided for ' affordable home ownership ' .

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

Amend Policy to reflect above comments.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

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Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed: **Chris Smith**

Dated: **14/12/2022**



Consultation Response Form

Diss & District Neighbourhood Plan 2021 - 2038

Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

Diss Town Council have submitted a Neighbourhood Plan (the 'DDNP') to South Norfolk Council and Mid Suffolk District Council. The Plan, which covers the Town and several surrounding parishes sets out a vision for the area and contains policies which it intends will be used to help determine planning applications where relevant. The submitted plan etc. can be found online at:

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- **Diss Library**, Church Street, Diss, IP22 4DD
- **Diss Town Hall**, 11-12 Market Hill, Diss, IP22 4JZ
- **Roydon - St. Remigius Church**, Roydon, Diss IP22 5RG
- **Scole Village Stores**, Assett House, The St, Scole, Diss IP21 4DR
- **Stuston - Place Farm Shop**, Place Farm, Old Bury Rd, Stuston, IP21 4AD
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<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

For Office use only: DD-029

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	Chris Smith
Job Title (if applicable):	Development Planner
Organisation / Company (if applicable):	Hopkins Homes Limited
Address:	Melton Park House Scott Lane Melton Woodbridge Suffolk IP12 1TJ
Postcode:	IP12 1TJ
Tel No:	01394 446914
E-mail:	christopher.smith@hopkinshomes.co.uk

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

For Office use only:

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	11
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input checked="" type="radio"/>	Oppose	<input type="radio"/>
Support with modifications	<input type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

See attached sheet.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

See attached sheet.

(Continue on separate sheet if necessary)

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I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed: **Chris Smith**

Dated: **14/12/2022**

Land East of Norwich Road, Scole

1. Hopkins Homes are providing this consultation response in reply to the Regulation 16 Consultation of the emerging Diss and District Neighbourhood Plan by the requested submission deadline of 16th December 2022.
2. Hopkins Homes Ltd is the largest independent house building company in East Anglia with a reputation for delivering well designed, high quality residential and mixed-use development harmonising with its local context. In the past decade the company has succeeded in delivering sustainable developments which improve neighbourhoods, improve local infrastructure and add to local distinctiveness throughout South Norfolk and the wider Greater Norwich area.
3. Hopkins Homes controls 15.75 Ha of land to the East of Norwich Road, with part of this land now forming the proposed allocation within the Neighbourhood Plan for approximately dwellings (Policy DDNP11) as shown on the Plan below.



4. Hopkins Homes fully supports the proposed allocation and are planning positively to deliver residential development on the site.
5. The land is the subject of an option agreement between the landowners and Hopkins Homes Ltd. which seeks to promote and deliver a residentially-led development of the site of approximately 50 dwellings, in accordance with the suggested Policy requirements of Policy DDNP11.

6. The site is therefore confirmed as being deliverable, in that it is available now, in a suitable location and achievable, with a realistic prospect of development being delivered on the site well within the next 5 years.
7. Scole is wholly sustainable as a location for new development. It has a population of close to 1,400 residents and approaching 600 dwellings. The village is well served by local education, sports and community facilities with good transport links to the nearby market town of Diss. The current local plan would see only 20 homes added to the housing stock over a 15-year period and this must be regarded as disproportionately low in the context of the growth aspirations of the Greater Norwich region in general.
8. Scole has been previously classified as a 'Service Village' within the current Development Plan, but in reality it more readily functions as a 'Key Service Centre' village, whereby day to day services and facilities are close at hand. Development here would be in tune with the Core Planning Principles of the NPPF. Indeed, Hopkins Homes have previously argued within Representations that Scole should accommodate higher levels of growth (which would help support existing facilities including the Primary School) and demonstrated how this could be sustainably achieved via a larger allocation on the land to the East of Norwich Road.
9. Hopkins Homes therefore support the housing requirement being expressed as a 'minimum', as this ensures flexibility over the Plan period and would enable additional growth to take place, where appropriate.
10. Whilst planning application timeframes would need to be further discussed with the District Council having regard to both Local and Neighbourhood Plan progress, theoretically, Hopkins Homes Ltd could progress an application on this site without delay, such that it could assist housing delivery within the next five years (with a projected delivery of 45 homes per full year).
11. The allocation of the above Norwich Road site, as part of the wider development strategy of the emerging Neighbourhood Plan, would go some way to providing certainty that an appropriate and deliverable housing location, in the control of a housing developer, can come forward, with the potential to achieve additional community facilities alongside additional residential development.
12. The location of the site to the north-east of the village is identified on the attached plan. The site is immediately to the north of the allocated housing site in the adopted Local Plan (Ref: SCO1), now also identified as site DDNP10 within the Draft Neighbourhood Plan.

13. The site is bordered by existing residential development, together with the proposed small 1Ha allocation of land under Policy DDNP10, the Village Hall and associated recreational playing fields to the south. Residential development, together with the village Primary School, lie along the opposite side of Norwich Road to the west, whilst the site is largely enclosed by strong existing boundary hedging and trees, enabling it to sit quietly within its surroundings, with little by way of wider visual impact. The proposed development of the site for 50 dwellings shown on the concept plan would enable this limited visual impact to be maintained.



14. In relation to biodiversity impacts, Hopkins Homes would submit that the development could be beneficial in that the biodiversity of the site is low and relatively benign at present, as highlighted by the recently undertaken Preliminary Ecological Assessment, which accompanies these Representations. The new development would add planting and native landscaping which would aid biodiversity objectives.
15. The site has also been the subject of a Desk-based Archaeological Assessment, which likewise confirms that whilst within an area of some archaeological interest, there are nonetheless unlikely to be any major archaeological constraints which would prevent the development of this site.
16. The site is within walking and cycling distance of key services, with the village benefitting from a Primary School, Village Hall, Public House and convenience store, with the market town of Diss less than two miles from the site.

17. There are no drainage or physical infrastructure issues which cannot be overcome by standard engineering solutions; thus the site is demonstrably deliverable in a sustainable and technically appropriate manner.
18. The potential impacts upon nearby heritage assets raised by criteria (a) of the Draft Policy can be suitably mitigated by careful design, ensuring that the settings of these assets are suitably respected and maintained, whilst the appropriate noise surveys and any subsequent required mitigation measures raised by criteria (b) can similarly be incorporated at the detailed design stage.
19. In conclusion, Hopkins Homes Ltd therefore wholly supports the Allocation of Site DDNP11 as a proposed Allocation for the residential development of at least 50 dwellings within the emerging Diss & District Neighbourhood Plan, with scope for the Allocation to be enlarged if considered appropriate and the settlement limit for the village extended accordingly.



Consultation Response Form

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<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

For Office use only: DD-030

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	Chris Smith
Job Title (if applicable):	Development Planner
Organisation / Company (if applicable):	Hopkins Homes Limited
Address:	Melton Park House Scott Lane Melton Woodbridge Suffolk IP12 1TJ
Postcode:	IP12 1TJ
Tel No:	01394 446914
E-mail:	

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

For Office use only:

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	13
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input type="radio"/>	Oppose	<input checked="" type="radio"/>
Support with modifications	<input checked="" type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

The first paragraph of this Policy is unnecessary, as the relevant statutory undertakers would be consulted upon any major residential development proposals, with any necessary works required to highway or drainage infrastructure in order to facilitate the development or mitigate its impacts secured by way of direct physical provision or financial contributions to enable others to do so via the CIL and S106 procedures.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

Amend Policy to reflect above comments.

(Continue on separate sheet if necessary)

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Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

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The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed: **Chris Smith**

Dated: **14/12/2022**

General Policy Comments

1. Hopkins Homes are providing this consultation response in reply to the Regulation 16 Consultation of the emerging Diss and District Neighbourhood Plan by the requested site submission deadline of 16th December 2022.
2. Hopkins Homes Ltd is the largest independent house building company in East Anglia with a reputation for delivering well designed, high quality residential and mixed-use development harmonising with its local context. In the past decade the company has succeeded in delivering sustainable developments which improve neighbourhoods, improve local infrastructure and add to local distinctiveness throughout the region.

Policy 4 – Housing Mix

3. Whilst noting and broadly concurring with the policy desire that all residential development proposals should provide a mix of housing types, the evidence to support the particular requirement for additional one-bedroomed dwellings appears weak. The Housing Needs Assessment of July 2019 undertaken to support the Plan appears to indicate that overall, through the lifespan of the Plan, the greater need will be for three, four and five-bedroomed dwellings.
4. It should be noted that one-bedroomed dwellings are disproportionately more expensive to build and less efficient in their ground-coverage than two-bedroomed dwellings, hence why traditionally two-bedroomed dwellings represent the 'entry-level' for the majority of households.

Policy 5 – Affordable Housing

5. Whilst noting the desired policy focus towards the 'social rent' tenure, this appears to be at odds with Government Guidance within the NPPF, which requires at least 10% of all affordable housing to be provided for 'affordable home ownership'.

Policy 13 – Funding and Delivery of Infrastructure

6. The first paragraph of this Policy is unnecessary, as the relevant statutory undertakers would be consulted upon any major residential development proposals, with any necessary works required to highway or drainage infrastructure in order to facilitate the development or mitigate its impacts secured by way of direct physical provision or financial contributions to enable others to do so via the CIL and S106 procedures.



Consultation Response Form

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<https://www.southnorfolkandbroadland.gov.uk/data-protection/south-norfolk-council-data-protection>
<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

For Office use only:DD-031

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	Matthew Williams
Job Title (if applicable):	Company Director
Organisation / Company (if applicable):	Williams Gallagher
Address:	Somerset House 37 Temple Street Birmingham
Postcode:	B2 5DP
Tel No:	07375 041974
E-mail:	matthew@williams-gallagher.com

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	Inside Land Group Ltd
Address:	34 Millicent Road West Bridgford Nottingham
Postcode:	NG2 7PZ
Tel No:	0115 9195 799
E-mail:	

For Office use only:

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	DDNP7
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support		Oppose	<input checked="" type="checkbox"/>
Support with modifications		Have Comments	

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

See attached letter

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

See attached letter

(Continue on separate sheet if necessary)

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I consider that a hearing should be held because ...

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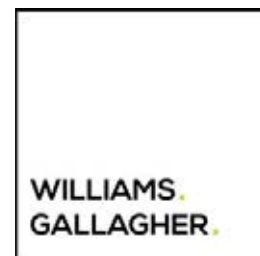
See attached letter

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	✓
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	✓

Signed: M Williams	Dated: 16/12/2022
---------------------------	--------------------------



Williams Gallagher

Somerset House
37 Temple Street
Birmingham
B2 5DP

williams-gallagher.com
m: 07375 041 974

e: matthew@williams-gallagher.com

16 December 2022

DDNP Consultation
c/o Place Shaping Team
South Norfolk Council
Thorpe Lodge
1 Yarmouth Road
Thorpe St Andrew
Norwich
NR7 0DU

Sent by Email: neighbourhoodplans@southnorfolkandbroadland.gov.uk

Dear Sirs

**DISS AND DISTRICT NEIGHBOURHOOD PLAN 2021-2038
REGULATION 16 CONSULTATION
OBJECTION SUBMITTED ON BEHALF OF INSIDE LAND GROUP LTD
LAND NORTH OF VINCES ROAD (DDNP7 – PREVIOUSLY DIS1)**

Williams Gallagher is instructed by Inside Land Group Ltd to submit this objection to the Diss and District Neighbourhood Plan (DDNP) in relation to the proposed reduction in the number of dwellings attributable to the proposed allocation at Land North of Vincés Road, Diss DDNP7 (formerly identified as Site DIS1) (“the Site”).

The continued objection follows the submission of the previous objections submitted by Williams Gallagher with regard to the policy for the proposed allocation during both Reg 14 stages (Aug 2021 and April 2022).

For the ease of reference, comments submitted during the second Reg 14 consultation (Major Modifications April 2022) are appended to this submission as they remain relevant to this objection being submitted to the Reg 16 Consultation.

BACKGROUND

Our previously submitted comments are summarised in the DDNP Consultation Statement on pages 83 and 94.

The original Reg 14 consultation version included the Site as DIS1 for approximately 35 dwellings reflecting the policy of the South Norfolk Local Plan. However at the Reg 14 Major Modifications consultation stage, the site was proposed to be deleted on the primary ground of lack of confidence of development being realised within the plan period. The Williams Gallagher submission made at the Major Modifications stage clearly identified that development could be delivered in the plan period. A subsequent planning application has been submitted to South Norfolk Council (see below).

At that stage, the Town Council’s Site Options and Assessment continued to identify the Site as being suitable for development however it suggested that the capacity might be reduced from that outlined in the South Norfolk Local Plan to 14 dwellings to take account of trees on site although this recommendation does not appear to have been supported by any professional arboricultural analysis.

The DDNP Consultation Statement issued with the Reg 16 consultation summarises the Williams Gallagher comments on p94. The response to the representations made state that the site allocation is to be carried forward but for a reduced allocation of 10 dwellings in line with evidence of the Site Options Assessment (albeit the SOA suggested 14 dwellings).

REASON FOR OBJECTION

The objections outlined in the Williams Gallagher letter remain relevant and are reiterated through this submission. No evidence has been submitted or published by the Town Council to justify:

- the reduction in Site capacity from 35 to 10 dwellings
- the requirement to retain trees in the southern part of the site on either biodiversity, arboriculture, or amenity value
- the need for vehicle access only to be via Frenze Hall Lane

PROPOSED MODIFICATIONS

The wording of Policy DDNP7 should be modified to state:

*"This 1.6ha site is allocated for residential development, to accommodate **at least 35 homes**. The development will be expected to address the following specific matters: "*

Sub-clauses a) and b) should be deleted in the absence of any evidence that the trees are of such quality to restrict development

Sub-clause c) should be amended to state:

c) Any planning application will need to be accompanied by an arboricultural impact assessment to justify any proposal for the loss of trees;

Sub-clause d) should be deleted or amended to state:

d) Deliver vehicular access to Frenze Hall Lane through Prince William Way, the adjacent housing development to the north of the site unless alternative access is proven to be available and suitable;

ADDITIONAL MATTERS

The Reg 16 Plan takes no account of the planning application currently being considered by South Norfolk Council for the development of the Site. This is application 2022/1344 which provides for 39 affordable dwellings accessed from Vinces Road. The currently proposed site layout is attached for information and shows that the Site can satisfactorily accommodate the proposed number of dwellings thereby making the most effective and efficient use of as required by the NPPF and deliver a significant number of much needed affordable homes.

The application is supported by appropriate technical supporting evidence including Arboricultural Impact Assessment to justify removal of trees and a Transport Assessment which confirms suitable access to Vinces Road is available in the absence of the ability to deliver access to the north by reason of ransom and to which the Highway Authority has not raised an objection.

South Norfolk is also one of the areas currently affected by the issue of Nutrient Neutrality which is preventing or delaying the early delivery of houses within the defined areas, The Site lies outside of the defined areas and is therefore better placed to contribute to providing much needed homes within the immediate term and to ensure that the potential under delivery of housing within South Norfolk is minimised.

The delivery of affordable homes should be given great weight given the ongoing need and the relevant constant level of households on the local housing waiting list still requiring suitable housing as identified by the Department for Levelling Up, Housing and Communities:

Total households on the housing waiting list at 31st March (from 2015/16 to 2020/21) for South Norfolk

Period	Total households on housing waiting list at 31 March			
	Households			
	South Norfolk	Minimum for All local authority districts in East	Mean for All local authority districts in East	Maximum for All local authority districts in East
2015/16	741	219	2,084	10,240
2016/17	588	242	2,104	12,419
2017/18	504	258	1,915	6,177
2018/19	657	359	2,019	8,642
2019/20	734	444	1,675	7,243
2020/21	687	538	1,817	8,274

Source:
Department for Levelling Up, Housing & Communities

In addition, we note that the South Norfolk Council Cabinet considered the Reg 16 Plan at its meeting on 17 October 2022. As part of its considerations, the Council report notes the following with regard to DDNP7. The concerns reflect those of Inside Land Group Ltd. The Minutes of the meeting (attached) confirm that the comments outlined form the proposed response of South Norfolk Council to the Reg 16 consultation:

No.	Section	Response
7	Policy DDNP7; paragraphs 121-123 (pp.41-42)	<p>The Council supports the reallocation of the Land North of Vince's Road.</p> <p>The Council notes that the Policy allocates the site for approximately 10 homes. The SOA (page 63) estimates the capacity of the site to be 14 dwellings. It is unclear why the Policy refers to the lower figure of 10 homes. This appears inconsistent with the evidence that underpins the Neighbourhood Plan.</p> <p>Moreover, the conclusion of the SOA is that it is important to retain the treed area to the east of the site on the basis of its ecological value and function as a noise buffer.</p> <p>This conclusion is clearly different to that previously reached by the Council. It is unclear on what basis the SOA has concluded that the treed area is of particular ecological importance that requires its retention or that it will be necessary to substantively retain the trees in order for future development to achieve compliance with appropriate standards in respect of noise.</p> <p>Whilst it may be appropriate to retain an element of the treed area for the purposes of noise abatement, it is not clear from the evidence the Council has identified that all of it would be necessary for these purposes. Moreover, it is unclear whether there is proportionate evidence that would justify the conclusion of the importance of the trees for their own value or for the purposes of ecology.</p>

To ensure that undue restrictions are not placed on the land, restricting its efficient use in accordance with section 11 of the NPPF and its potential contribution to government's objective of significantly boosting the supply of land for housing, the Council considers that the following amendments should be made to the policy:

The site should be allocated to accommodate at least 14 homes. This reflects the findings of the SOA but also the apparent uncertainty in terms of the evidence supporting the need to retain the treed area.

Criteria a) and c) of Policy DDNP7 should be aggregated. This should require an arboricultural and ecological assessment to support any planning application to establish the need to retain the area in part or in whole on the basis of the arboricultural or ecological value of the trees. It can reasonably be expected that any future development will be subject to the need to achieve 10% bio-diversity net gain in accordance with the emerging GNLP and/or implementation of the Environment Bill.

Given its position and relationship to Frenze Beck. It is somewhat unclear how development can realistically achieve functional connectivity to green infrastructure along Frenze Beck. The Council notes that the site does not lie along a Green Corridor as defined under Policy 8. At the moment it is therefore unclear why this specific criteria is justified. This is distinct from the current Local Plan policy criteria of contributing toward the protection and enhancement of the CWS and adjacent land.

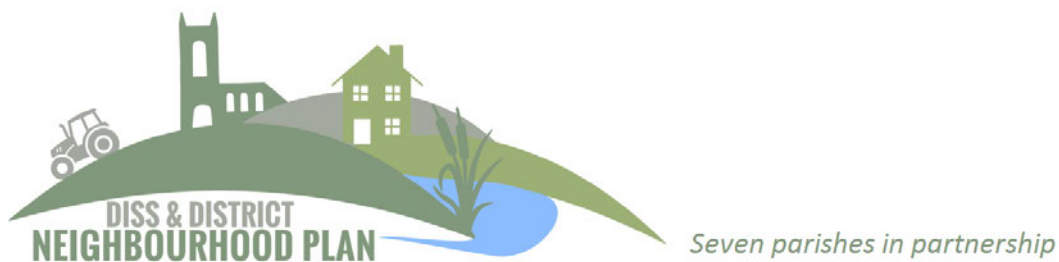
REQUEST FOR HEARING

Unless changes to the policy as requested through this letter are made, Williams Gallagher would wish for a hearing to be held to discuss the wording of Policy DDNP7 in light of objections being made by Inside Land Group Ltd through this letter and comments being made by South Norfolk Council.

Yours faithfully



Matthew Williams
WILLIAMS GALLAGHER



Major Modifications Consultation Response Form

If you, or someone you know, is unable to complete the online survey, you can print out this response form, complete it and post it to DDNP, c/o Diss Town Council, 11-12 Market Hill, Diss, Norfolk, IP22 4JZ.

**Please ensure your feedback is with Diss Town Council by the deadline date:
Thursday May 5th 2022.**

Your Name(s): Matthew Williams

Organisation (if applicable) Williams Gallagher

Your address: Somerset House, 37 Temple Street, Birmingham

Your postcode: B2 5DP

Your contact preference (email and or phone): matthew@williams-gallagher.com

Please indicate which of the following apply, by typing/writing an **X** next to your answer.

- I live in the DDNP area
- I work in the DDNP area
- I am a statutory consultee
- I am an agent X
- I am a landowner
- None of the above

Consent (you must complete this section)

A summary of all comments made will be publicly available. Please note that any other personal information provided will be confidential and processed in line with the Data Protection Act 1998 and General Data Protection Regulations. Diss Town Council (as the lead council) will process your details in relation to the preparation of this document only. The Privacy Statement can be found [here](#).

As part of the Consultation and in line with the new General Data Protection Regulations (GDPR) please confirm that you are happy for the Diss Town Council to pass on your contact details (name, address/email address) onto South Norfolk Council (as the lead Local Planning Authority) so that they can contact you at Regulation 16 consultation. *

I consent to Diss town Council (as the lead council) processing my details in relation to this preparation of the Neighbourhood Plan

Please write/type 'yes' against this statement to show you agree: Yes

I consent to Diss town Council passing my contact details to south Norfolk Council (as the lead Local Planning Authority)

Please write/type 'yes' against this statement to show you agree: Yes

Please leave any comments you may have in relation to this Major Modifications Consultation Document in the space below. You are welcome to continue on a separate sheet if you need more space. Thank you, your participation in this consultation is very much appreciated.

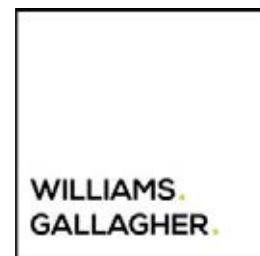
1. Do you have any comments in relation to major modification 1 – Amended Policy: Scale and location of housing growth? Yes.

Please see attached letter of representation

2. Do you have any comments in relation to major modification 2 – New Policy: Regeneration of the Waveney Quarter, Diss? No

3. Do you have any comments in relation to major modification 3 – New Policy: Diss Business Park? No
4. Do you have any comments in relation to major modification 4 – New Policy: Surface Water Management? No
5. Do you have any comments in relation to major modification 5 – Amended Policy: Local Green Space? No

End of feedback form.



Williams Gallagher
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28 April 2022

DDNP Steering Group
Diss Town Council
11-12 Market Hill
Diss
IP22 4JZ

Sent by Email: ddnp@diss.gov.uk

Dear Sirs

**DISS AND DISTRICT NEIGHBOURHOOD PLAN – REG 14 MAJOR MODIFICATIONS
OBJECTION SUBMITTED ON BEHALF OF INSIDE LAND GROUP
LAND AT VINCE’S ROAD (FORMERLY DIS1)**

Williams Gallagher is instructed by Inside Land Group to submit this objection to the Diss and District Neighbourhood Plan (DDNP) in relation to the proposed deletion of the allocation of Land at Vince’s Road, Diss (formerly identified as Site DIS1) (“the Site”) for residential development.

The Site is one of several draft allocations proposed to be deleted or have their identified dwelling capacity reduced. At the same time a new housing allocation is proposed in Scole.

The general reason for the proposed changes are stated as being:

- *the overall level of housing growth required through the allocations in Diss has reduced due to recent planning permission, which includes the Churchill development for 73 retirement homes on land behind Thatcher’s Needle*
- *further assessment work to determine the suitability of each site and its ability to accommodate the level of growth proposed*

In terms of the specific reason for the proposed deletion of the Site as an allocation, the following reason is provided:

“Lack of confidence that development would be realised in the plan period. The site was originally allocated in the 2015 South Norfolk Local Plan and development is yet to come forward. Given there are other available and suitable sites, including those on brownfield land within Diss, that can be allocated to meet the housing requirement, the site has been de-selected.”

The proposed changes have been based on the evidential base produced to support the plan. This principally, is in relation to the Site Options and Assessment 2022 Additional Sites Focused Report 2022(SOA3) prepared for the Council by AECOM. This report is to be read in conjunction with previous Site Options and Assessment Reports prepared in 2019 (SOA1) and 2020 (SOA2).

The Site was partially identified in SOA1 (ref GNLP0185). The site source was the HELAA (2017)¹ produced as part of the initial work to prepare the emerging Greater Norfolk Local Plan (GNLP). As part of the site assessment methodology, the HELAA noted at para 3.4 of the report:

*“In terms of both **housing and employment allocations**, the local plan documents which make the allocations are all relatively recently adopted, all having been through the examination process in the last four years and adopted in the last three years. These plans all run to at least 2026, with some*

¹ Housing and Economic Land Availability Assessment (HELAA) Dec 2017

*sites in Broadland's Growth Triangle area Action Plan extending beyond 2026. **As such it is considered reasonable to assume that such recently tested sites are capable of delivery by 2036.***"

The conclusion in the HELAA was that the site (GNLP0185):

- already formed part of a local plan allocation
- was not considered subject to any constraint incapable of being mitigated
- was suitable

However, as an existing allocation, the Site would not contribute additional development capacity for the purposes of the HELAA and for this reason only was the Site considered unsuitable (ie it was not required to be considered as it was already an allocation and therefore contributing to the housing requirement).

SOA1 also acknowledged that the Site was an existing allocation in the adopted SNLP and was not therefore required to be considered for the purposes of allocation within the DDNP. Again, it was considered to be a commitment contributing towards the required housing delivery.

SOA2 noted that the emerging GNLP *"Policy 7.2 The Main Towns" states that within Diss (with part of Roydon adjacent to Diss) there are 343 new homes on sites that are already allocated [emphasis added] for proposed residential development and 400 new allocations"* (SOA2 Executive Summary). For the purposes of these representations, SOA2 was therefore acknowledging the capacity of the existing allocations (which includes the Site as allocation DIS1) as part of the housing target.

As with SOA1, the conclusion reached by SOA2 on the Site was that it was an existing allocation in the local plan (and thereby contributing to the housing delivery) and, as such, did not require to be allocated by the DDNP.

Throughout it is clear that the evidence base for the preparation of the DDNP accepted that the allocation was contributing to the required housing numbers and reliance was being placed upon the higher order plan for the allocation.

It is not unreasonable for this reliance to have been expected to continue through the preparation of the GNLP and, indeed, the GNLP text noted that existing allocations formed commitments as part of the required housing delivery. The GNLP is now at an advanced stage of preparation. It did not, eventually, roll forward the existing SNLP DIS1 allocation. At the same time the DDNP had not been allocating the site as it forms a commitment in the current SNLP and was expected to be carried forward as an allocation by the GNLP. The situation is therefore that the site, although still contributing to the housing delivery target effectively falls between two stools and that once the GNLP is adopted, unless it is allocated by the DDNP, it will have no formal planning allocation status.

Objections to the failure to roll forward the allocation within the GNLP were submitted by Williams Gallagher in March 2021. Conversations with relevant officers at SNDC and representatives of the planning group for the DDNP acknowledged the discrepancy and stated that it was not the intention of either the GNLP or the DDNP to leave the Site unallocated. However, this is now the case despite the assurances of the Councils.

The GNLP response to the objection was as follows:

*"The delivery of existing allocations DIS1 and DIS3 appears likely and their inclusion in commitment at the present time is considered reasonable. Therefore, this is not a matter that affects the overall soundness of the GNLP. Alternatively, **should DIS1 or DIS3 be delayed, then any updating or carrying forward of the policy can be undertaken** by the Diss and District Neighbourhood Plan, this being appropriate given the ambition to devolve plan making to the community level where possible."* [emphasis added]

The higher order plan therefore clearly anticipates that the existing allocations will be carried forward as commitments and ONLY if they are delayed would a potential review be undertaken through the District Plan process that might result in change.

This is not the position that the DDNP now presents.

We therefore turn to the Site Options and Assessment Report (SOA3). The methodology for the site assessment does not indicate in any of the site considerations that the view of the site owner or promoter/developer were sought as part of the reassessment despite Williams Gallagher having made representations to the previous Regulation 14 consultation and having spoken with the consultant preparing the Neighbourhood Plan as outlined above. If the author of SOA3 had been directed to Williams Gallagher, or our previous submissions, this would have provided up to date information about land owner/developer intention for the Site.

The SOA3 Assessment of the Site includes:

Table 2 – which notes the site allocation in the SNLP but that there has not been a recent/relevant planning application. An assessment was therefore proposed.

Table 3 – provides a summary of the site assessment carried out as a result of actions outlined in Table 2 as shown below:

Table 3 Summary of Site Assessment

Site Ref.	Site Name	Area (Ha)	2022 Neighbourhood Plan Site Assessment Summary	Assessment of suitability for allocation
DIS1	Land North of Vince's Road	1.18	<p>To be read in conjunction with Appendix C</p> <p>This is a greenfield site located to the north east of the town, adjacent to the railway line. The south eastern part of the site has dense tree cover and would not be appropriate to develop, this would therefore reduce the potential development area on the site. The proximity to the railway line may also be a constraint; however, due to tree coverage along the railway and the development to the north which has been built up to the edge of the railway, this is unlikely to reduce the developable area further. This site meets both emerging and adopted Local Plan policy. Vehicular access could be provided from Prince William Way. The previous Local Plan allocation for housing is appropriate to carry forward for allocation in the Neighbourhood Plan; however, the development potential is likely to be reduced to around 10 dwellings to allow for retention of the trees.</p>	Suitable for development of 10 dwellings

The Assessment in the Appendix C includes the following summary of the Site:

<p>Summary of justification for rating</p>	<p>This is a greenfield site located to the north east of the town, adjacent to the railway line.</p> <p>The south eastern part of the site has dense tree cover and would not be appropriate to develop, this would therefore reduce the potential development area on the site. The proximity to the railway line may also be a constraint; however, due to tree coverage along the railway and the development to the north which has been built up to the edge of the railway, this is unlikely to reduce the developable area further.</p> <p>This site meets both emerging and adopted Local Plan policy. Vehicular access could be provided Prince William Way.</p> <p>The previous Local Plan allocation for housing is appropriate to carry forward for allocation in the Neighbourhood Plan; however, the development potential is likely to be reduced to around 10 dwellings to allow for retention of the trees.</p>
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Nothing within the assessment indicates that a Tree Survey has been carried out by the assessing consultant to support the conclusions of their assessment. The conclusion on this point is therefore not supported by up to date evidence.

As discussed with representatives of the Town Council on 17 March, our client will, imminently, be submitting a planning for the development of 39 much needed affordable homes on the Site. The application will be supported by a full suite of supporting technical documents including a detailed tree survey that clearly demonstrates that the trees are generally of local quality/immature and do not represent a barrier to development. It is clear, through the National Planning Policy Framework, that development should make the most effective and efficient use of land. The Site therefore remains fully capable of, and is appropriate for, development and is deliverable within the original local plan timeframe. We therefore request that the inappropriate and unnecessary deletion of the Site as an allocation at this very late stage of the preparation of the Neighbourhood Plan process is reversed and the allocation maintained.

The allocation of sites to meet the housing requirement should be based upon the latest available evidence. 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.

As allocated sites, these have been tested at inquiry and been found to be suitable, available and achievable. The SNLP timeframe provides for development up to 2026. There remains time within the plan period for the Site to deliver the identified number of dwellings identified through the SNLP allocation and the District Council has been made aware of developer intention in this regard. The justification for the deallocation on the basis of lack of confidence that the Site will come forward within the plan period is therefore misplaced and not justifiable.

The Site should continue to be allocated with the dwelling capacity as originally identified by the SNLP.

Furthermore, the decision that has been made through consideration of the SOA3 has led to the need for additional land to have to be released through the DDNP. This new site is in a lower order settlement than Diss and therefore does not benefit from the same direct level of services as the Diss sites and is in a less sustainable location not being directly served by rail as well as public transport. Its development is therefore likely to result in more car journeys than the DIS1 site. Furthermore, SOA3 identifies the new site (DDNP11) as a lower preferential site than the DIS 1 (it being classified as amber in the assessment as opposed to DIS 1 which is green) and to be subject to a greater level of potential constraints that will need to be addressed including limited access, greater risk of flooding, effect on public rights of way, the site being within a Woodland Priority Habitat Network, nearby heritage assets and that the site itself is not defined by recognisable physical boundaries. The disbenefits of/constraints to its development therefore considerably and demonstrably outweigh those of DIS1. Its allocation is therefore considered to be contrary to the principles of the NPPF and it should be deleted in favour of the continued allocation of DIS 1 for development to its full capacity as identified in the SNLP.

We will be continuing to make these representations as part of the Regulation 16 consultation to be held by the local planning authority following any submission of the plan to them and request that you notify us of your submission of the plan to them.

Yours sincerely



Matthew Williams
WILLIAMS GALLAGHER

Revision:	Date:	Drawn:	Check:
A	Layout adjusted following comments made in the meeting on 28.02.22	03.03.22	IMW S/G
B	Updated following comments made in the meeting on 07.03.2022, regarding turning head at the access to the industrial area. Red line boundary adjusted.	07.03.22	IMW S/G
C	Updated red line boundary to not include the unregistered land.	09.03.22	IMW S/G
D	Updated position to the basin following drawing received from HEXA on 2022-03-11.	14.03.22	IMW S/G
E	Parking to plots 025/026 updated. Title block updated to state 'Inside Land East Anglia Ltd and Flagship Group' as clients.	15.03.22	IMW S/G
F	Basin adjusted to HEXA's drainage drawing. Root line added along the railway.	24.03.22	IMW S/G
G	Tenure of plots updated following clients request.	01.04.22	IMW S/G
H	Layout updated to match the landscape plan from fda landscape. Schedule of accommodation updated.	04.04.22	IMW S/G
I	Schedule updated. Sub station added.	07.04.22	IMW S/G
J	Schedule updated.	11.04.22	IMW S/G
K	Total site area updated. Bin store added for maisonettes. Cycle store provisions added.	13.04.22	IMW S/G
L	Site layout updated to latest landscape plan and drainage strategy. PV panels added following receiving the energy statement from Anderson Green. Note added.	09.05.22	IMW S/G
M	Note removed.	18.05.22	IMW S/G
N	Open space calculation updated.	23.05.22	IMW S/G
O	Pumping station indicated on the plan.	05.10.22	S/G RAW
P	Site access and internal road amendments.	06.11.22	MK S/G
Q	The dimensions of the parking spaces updated.	07.11.22	JP S/G



Schedule of Accommodation			
Type	Storeys	GIA(m ²)	No.
A/R			
1B2P BUNG	1	50.0m ²	2
1B2P MAIS GF	1	51.0m ²	2
1B2P MAIS FF	1	57.5m ²	2
2B4P BUNG	1	70.0m ²	2
2B4P HOUSE	2	79.0m ²	10
3B5P BUNG	1	86.0m ²	1
3B5P HOUSE	2	93.0m ²	3
4B7P HOUSE	2	115.0m ²	2
Sub Total			24
S/O			
2B4P HOUSE	2	79.0m ²	11
3B5P HOUSE	2	93.0m ²	4
Sub Total			15
TOTAL			39

Open Space Calculation = 2868.5m²

Long Stay Cycle Provisions
 1 bed = shed 1.6m x 2.5m
 2 bed or larger = shed 2.5m x 2.5m

Total Site Area = 1.419Ha

KEY

- Private drive
- Adopted road
- Plots with side windows for surveillance/overlooking
- Turf / Proposed rear grass seed mix
- Ornamental shrub planting
- Native species scrub mix
- Wildflower grass seed mix
- Wetland wildflower grass seed mix
- Native species hedge
- Bench hedging / Evergreen hedging
- Extra-heavy standard trees
- Selected standard trees
- Root protection line
- Detention basin (no permanent water)
- 1 in 100 yr + 40% CC
- 1 in 30 yr
- 1 in 10 yr
- 1 in 2 yr
- Base level
- Photo-Voltaic (solar PV) Panel - 1.6m² per panel *

* Sizing to be confirmed by a PV installer



Project: A development of Vince's Road, Diss

Status: PLANNING

Client: Inside Land East Anglia Ltd and Flagship Group

Sheet title: Proposed Site Layout

Scale: 1:500

Date: 23-02-2022

Drawn: IMW

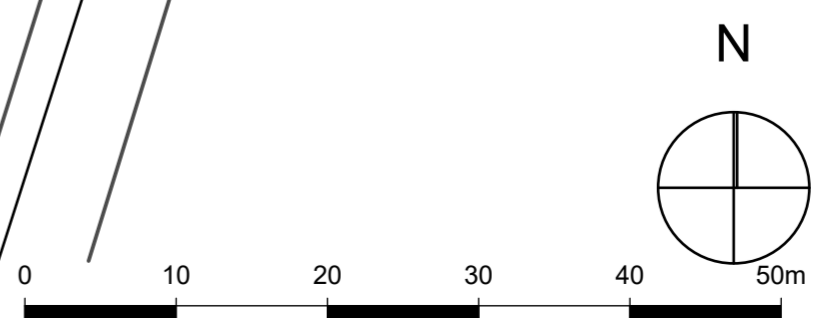
Checked: S/G

Ref: 101-308/(P)015Q

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 74 Wells Street, London, W1T 3QQ · T 020 3327 0381
 F 0116 204 5801 · rg-p.co.uk · design@rg-p.co.uk

Notes
 All designs should be constructed in strict accordance with building regulations. In addition any materials, components and fixings in/or connected to a façade should be non-combustible if the top storey of the building is above 11m.

All dimensions to be checked on site. Do not scale off this drawing for construction purposes. This drawing is the copyright of the Architect, and not to be reproduced without their permission. Ordnance Survey map information reproduced with permission of HMSO Crown Copyright reserved. rg+p Ltd. Trading as rg+p.





Cabinet Agenda

Members of the Cabinet:

Cllr J Fuller (Chairman)	Leader, External Affairs and Policy
Cllr K Mason Billig (Vice Chairman)	Governance and Efficiency
Cllr A Dearnley	Finance and Resources
Cllr R Elliott	Customer Focus
Cllr G Minshull	Clean and Safe Environment
Cllr L Neal	Stronger Economy
Cllr A Thomas	Better Lives

Date & Time:

Monday 31 October 2022
9.00 am

Place:

To be held in the Council Chamber at South Norfolk House, Cygnet Court, Long Stratton, Norwich, NR15 2XE

Contact:

Claire White tel (01508) 533669
Email: committee.snc@southnorfolkandbroadland.gov.uk
Website: www.southnorfolkandbroadland.gov.uk

PUBLIC ATTENDANCE:

This meeting will be live streamed for public viewing via the following link:

<https://www.youtube.com/channel/UCZciRqwo84-iPyRlmsTCInq>

If a member of the public would like to observe the meeting in person, or speak on an agenda item, please email your request to committee.snc@southnorfolkandbroadland.gov.uk, no later than 5.00pm on Wednesday 26 October 2022.

Large print version can be made available

If you have any special requirements in order to attend this meeting, please let us know in advance.

Cabinet agreed that the document was an excellent, thorough and well thought out plan, which had been a pleasure to read. Referring to the modifications, the Chairman felt that these had only been minor and added clarity in some areas.

It was

RESOLVED:

To approve each of the recommended modifications to the Tivetshalls Neighbourhood Plan, as detailed within the examiner's report, and publish a Decision Statement setting out the Council's response and announcing the intention for the Neighbourhood Plan to proceed to a referendum.

The Reason for the Decision

Cabinet is satisfied with the recommended modifications from the independent examiner.

Other Options Considered

None

3039 DISS & DISTRICT NEIGHBOURHOOD PLAN SUBMISSION

Members considered the report of the Senior Community Planning Officer, which presented Cabinet with the latest version of the Diss and District Neighbourhood Plan and sought agreement to take it through to the next stages of consultation and independent examination.

Members noted that the Plan covered seven different parishes, two district councils and straddled two counties, which made the Plan particularly complex and unique. It had been in the planning for approximately seven years, and Cabinet commended its depth and complexity, and congratulated all those who had been involved in its production.

In response to queries, the Senior Community Planning Officer explained that a programme of activity had been established with colleagues in Mid Suffolk, to ensure that the appropriate decision making and consultation were in sync.

With regard to CIL, the Place Shaping Manager explained that he expected any funds due to be paid to the individual town or parish, and that there was no indication at present, that they were looking to pool funding. However, there was scope to negotiate joint projects, if required. The Chairman stressed the need for clarity and for ground rules to be set at an early stage.

A member referred to the proposal within the Plan to include the Mid Suffolk parishes of Brome, Oakley, Palgrave and Sturston in South Norfolk Council's affordable housing cascade, and queried whether this was feasible. In response, the Housing and Wellbeing Senior Manager explained that this was possible and could be achieved, but would require officers to work with the

neighbouring authority to ensure that there was a fair distribution of houses and was in the best interests of all residents.

During further discussion, the Chairman referred to the reference made in the Plan to the Greater Norwich Indoor Sports Facilities Strategy, and he advised that this had recently been updated by the GNDP. He also drew attention to Allocation DDNP16, the Feather Mills site, south of Park Road, in Diss. He had heard that the owners of the site had gone in to liquidation, and suggested that as a material change to the ownership of the land, this required investigation. The Senior Community Planning Officer agreed to raise this as part of the consultation process.

It was

RESOLVED:

To agree:

1. That the submitted Diss & District Neighbourhood Plan meets the requirements of Part 6 of Schedule 4B of the Town and Country Planning Act 1990.
2. That the Neighbourhood Plan can therefore proceed to consultation, in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012, and subsequently to an independent examination.
3. That the proposed South Norfolk Council response, as detailed in Appendix 2 of the report, is formally submitted as part of the Regulation 16 consultation report (subject to minor amendments).

The Reason for the Decision

The Plan has met the assessment criteria and should therefore progress through to the next stage of consultation and independent examination.

Other Options Considered

None.

3040 UPDATE TO THE LOCAL DEVELOPMENT SCHEME

Members considered the report of the Place Shaping Manager, which proposed amendments to the current Local Development Scheme (LDS), to reflect changes to the timetable for the Greater Norwich Local Plan, the South Norfolk Village Clusters Housing Allocations Plan (VCHAP) and the East Norwich Masterplan Supplementary Planning Document (SPD).

The Place Shaping Manager reminded members that this was a procedural document, and it was a statutory requirement to update the LDS regularly.



Consultation Response Form

Diss & District Neighbourhood Plan 2021 - 2038

Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

Diss Town Council have submitted a Neighbourhood Plan (the 'DDNP') to South Norfolk Council and Mid Suffolk District Council. The Plan, which covers the Town and several surrounding parishes sets out a vision for the area and contains policies which it intends will be used to help determine planning applications where relevant. The submitted plan etc. can be found online at:

- www.southnorfolkandbroadland.gov.uk/ddnp
- www.midsuffolk.gov.uk/DissandDistrictNP

Printed copies of the DDNP have also been deposited at the following locations, where they can be viewed on request during normal opening hours:

- **Brome & Oakley Village Hall**, The Street, Brome, IP23 8AE (Contact Parish Clerk to arrange viewing –07554 733621)
- **The Burston Crown**, Mill Rd, Burston, Diss IP22 5TW (Open 12:00-22:30 Wed-Sat)
- **Diss Library**, Church Street, Diss, IP22 4DD
- **Diss Town Hall**, 11-12 Market Hill, Diss, IP22 4JZ
- **Roydon - St. Remigius Church**, Roydon, Diss IP22 5RG
- **Scole Village Stores**, Assett House, The St, Scole, Diss IP21 4DR
- **Stuston - Place Farm Shop**, Place Farm, Old Bury Rd, Stuston, IP21 4AD
- **South Norfolk Council – The Octagon**, 40 Mere Street, Diss, Norfolk, IP22 2AH

HOW TO SUBMIT YOUR COMMENTS

All comments on this Plan must be submitted in writing and be received by no later than **4:00pm on Friday 16 December 2022**.

- **Complete Section One** in full so that your representation(s) can be considered at the Examination stage.
- **Complete Section Two**, identifying which paragraph / policy your comments relate to. You may comment on more than one part of the Plan but must make this clear. Use separate forms if necessary.
- **E-mail your comments to:** neighbourhoodplans@southnorfolkandbroadland.gov.uk
- **Post your comments to:** DDNP Consultation, c/o Place Shaping Team, South Norfolk Council, Thorpe Lodge, 1 Yarmouth Road, Thorpe St. Andrew, Norwich, NR7 0DU

It will not be possible to accept late representations

At the end of the consultation period, all comments received will be collated and then be forwarded on to the appointed Examiner. You should not assume that there will be further opportunities to introduce new information, although the Examiner may choose to seek clarity on certain matters.

Data Protection: All information collected and processed by South Norfolk Council and Mid Suffolk District Council at this stage is by virtue of our requirement under the N'hood Planning (General) Regulations 2012. All comments received will be made publicly available and may be identifiable by name / organisation. All other personal information will be protected in accordance with the Data Protection Act 2018. For more information on how we do this and your rights with regards to your personal information, and how to access it, please visit our websites or contact us at data.protection@southnorfolkandbroadland.gov.uk (SNC) or at customer.services@baberghmidsuffolk.gov.uk (MSDC).

<https://www.southnorfolkandbroadland.gov.uk/data-protection/south-norfolk-council-data-protection>

<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

For Office use only:DD-032

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	Matthew Williams
Job Title (if applicable):	Company Director
Organisation / Company (if applicable):	Williams Gallagher
Address:	Somerset House 37 Temple Street Birmingham
Postcode:	B2 5DP
Tel No:	07375 041974
E-mail:	matthew@williams-gallagher.com

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	Inside Land Group Ltd
Address:	34 Millicent Road West Bridgford Nottingham
Postcode:	NG2 7PZ
Tel No:	0115 9195 799
E-mail:	

For Office use only:

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	DDNP6
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support		Oppose	<input checked="" type="checkbox"/>
Support with modifications		Have Comments	

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

See attached letter

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

See attached letter

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

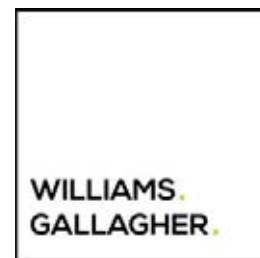
See attached letter

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	✓
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	✓

Signed: M Williams	Dated: 16/12/2022
---------------------------	--------------------------



Williams Gallagher

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e: matthew@williams-gallagher.com

16 December 2022

DDNP Consultation
c/o Place Shaping Team
South Norfolk Council
Thorpe Lodge
1 Yarmouth Road
Thorpe St Andrew
Norwich
NR7 0DU

Sent by Email: neighbourhoodplans@southnorfolkandbroadland.gov.uk

Dear Sirs

**DISS AND DISTRICT NEIGHBOURHOOD PLAN 2021-2038
REGULATION 16 CONSULTATION
OBJECTION SUBMITTED ON BEHALF OF INSIDE LAND GROUP LTD
LAND AT DENMARK LANE (DDNP6 – PREVIOUSLY DIS3)**

Williams Gallagher is instructed by Inside Land Group Ltd to submit this objection to the Diss and District Neighbourhood Plan (DDNP) in relation to the proposed reduction in the number of dwellings attributable to the proposed allocation at Land off Denmark Lane, Diss DDNP6 (formerly identified as Site DIS3) (“the Site”).

The continued objection follows the submission of the previous objections submitted by Williams Gallagher with regard to the policy for the proposed allocation during both Reg 14 stages (Aug 2021 and April 2022).

For the ease of reference, comments submitted during the second Reg 14 consultation (Major Modifications April 2022) are appended to this submission as they remain relevant to this objection being submitted to the Reg 16 Consultation.

BACKGROUND

Our previously submitted comments are summarised in the DDNP Consultation Statement on pages 83 and 94.

The objection was primarily but not wholly based upon the proposed reduction in capacity of the allocation from that identified in the extant South Norfolk Local Plan without sufficient and robust evidence to support the changes.

At that stage, the Town Council’s Site Options and Assessment identified the previous allocation of the Site for 42 dwellings and concluded that the allocation for at least 42 was appropriate to be carried forward in the Neighbourhood Plan. Nothing in the March 2022 or Consolidated Version July 2022 suggests that any change should be made to the policy or allocation.

Notwithstanding this, the Reg 14 Major Modification consultation made changes to the policy from that consulted upon in the original Reg 14 consultation including:

- Reduction in site capacity from 42 to 25 dwellings
- Increase width of proposed western landscaped buffer for 10m to 20m
- Introduction of requirements for open amenity play space to serve the development and contribution to local facilities

The DDNP Consultation Statement issued with the Reg 16 consultation summarises the Williams Gallagher comments on p94. No change to the policy has been proposed between the Reg 14 Major Modification Plan and the Reg 16 Plan. No additional justification for the changes have been made.

REASON FOR OBJECTION

In the absence of any change to Policy DDNP6 Land at Denmark Lane, Diss, the objections outlined in the Williams Gallagher letter remain relevant and are reiterated through this submission. No evidence has been submitted or published by the Town Council to justify:

- the reduction in Site capacity from 42 to 25 dwellings
- the increased landscaped buffer requirement from 10m width to 20m width or why the original requirement was insufficient to help provide a buffer to the strategic gap to the west.

PROPOSED MODIFICATIONS

The wording of Policy DDNP6 should be modified to state:

*"This 1.6ha site is allocated for residential development, to accommodate **at least 42 homes**. The development will be expected to address the following specific matters: "*

Sub-clause b should revert to its former provision:

*"b) Provide approximately **10m** landscape belt to the western boundary to protect the landscape value of the strategic gap and to provide a soft edge to the development;"*

ADDITIONAL MATTERS

The Reg 16 Plan takes no account of planning applications currently being considered by South Norfolk Council for the development of the Site. Two applications have been submitted with full suite of technical supporting documents. These are:

- 2022/1975 – residential development for 6 x private dwellings
- 2022/1976 – residential development for 47 affordable dwellings

The proposed site layouts are attached for information and show that the Site can satisfactorily accommodate the proposed number of dwellings whilst maintaining a 10m landscaped buffer thereby making the most effective and efficient use of land as required by the NPPF and delivering a significant number of much needed affordable homes.

South Norfolk is also one of the areas currently affected by the issue of Nutrient Neutrality which is preventing or delaying the early delivery of houses within the defined areas, The Site lies outside of the defined areas and is therefore better placed to contribute to providing much needed homes within the immediate term and to ensure that the potential under delivery of housing within South Norfolk is minimised.

The delivery of affordable homes should be given great weight given the ongoing need and the relevant constant level of households on the local housing waiting list still requiring suitable housing as identified by the Department for Levelling Up, Housing and Communities:

Total households on the housing waiting list at 31st March (from 2015/16 to 2020/21) for South Norfolk

Period	Total households on housing waiting list at 31 March			
	Households			
	South Norfolk	Minimum for All local authority districts in East	Mean for All local authority districts in East	Maximum for All local authority districts in East
2015/16	741	219	2,084	10,240
2016/17	588	242	2,104	12,419
2017/18	504	258	1,915	6,177
2018/19	657	359	2,019	8,642
2019/20	734	444	1,675	7,243
2020/21	687	538	1,817	8,274

Source:

Department for Levelling Up, Housing & Communities

South Norfolk Council's Housing and Enabling Officer also supports the proposals as noted through the formal pre-application response issued by the Council:

Policy DM3.1 requires the provision of a range of dwellings to meet the need identified in the Strategic Housing Market Assessment (SHMA) and this includes affordable homes. The Council's Housing Enabling Officer is supportive of this proposal as this site is in a sustainable location close to Diss town centre and of a suitable size for a mix of homes for rent and affordable ownership.

In addition, we note that the South Norfolk Council Cabinet considered the Reg 16 Plan at its meeting on 17 October 2022. As part of its considerations, the Council report notes the following with regard to DDNP6. The concerns reflect those of Inside Land Group Ltd. The Minutes of the meeting (attached) confirm that the comments outlined form the proposed response of South Norfolk Council to the Reg 16 consultation:

6	Policy DDNP6; paragraphs 117-120 (pp.40-41)	<p>Paragraph 118 sets out that the SOA identifies the site as Amber, on the basis that it is suitable for allocation subject to certain constraints being overcome.</p> <p>The Council has reviewed the SOA conclusions report. Paragraph 4.4. of the SOA report sets out that DIS3 is suitable for allocation, without caveat. The reference to DIS3 in table 3 of the SOA (page 73) then rates the site as green deeming the allocation of 42 dwellings as appropriate to carry forwards. The overall rating for the site in the SOA as set out in Appendix A - Site Assessment Proforma of the SOA (page 183 - 188) rates the site as green stating that the "site is suitable for development and allocation in the neighbourhood (plan) subject to confirmation of availability" on the basis of an expected development capacity of 42 dwellings.</p>
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On the basis of the information that the Council has identified, it is unclear why the policy has deemed it necessary to reduce the allocation from 42 homes to 25. This is a low density and the Council is concerned that it does not represent an efficient use of land, which may mean that actual levels of development will significantly exceed this level. The Council considers that the policy should be amended to state approximately 40 homes in line with the current allocation. This is to ensure the efficient use of land in accordance with section 11 of the NPPF.

It is also unclear on what basis the Neighbourhood Plan has resolved that a 20m landscape belt is needed along the western boundary of the site. Whilst the boundary of the proposed Strategic Gap (Map 20) is currently difficult to identify precisely, the site appears to sit outside of the Strategic Gap, is bounded by existing allotments and setting the development back eastwards by 20m from the site boundary would not reflect the extent of the development to the immediate north. The boundary proposed is also double the buffer proposed in the current DIS3 policy.

On this basis the Council would recommend that criteria (b) of Policy DDNP6 is reworded to reflect the principle of what is attempting to be achieved rather than the precise boundary i.e. "Provision of landscaping along the western boundary to provide a clear visual demarcation between the edge of Diss and the defined strategic gap as set out in Policy 14." This approach is considered to protect the valued landscape buffer in a manner commensurate with its identified quality without potentially, unduly restricting the efficient use of land.

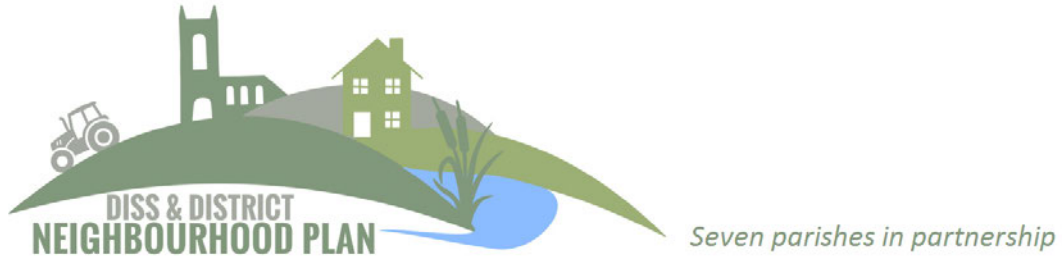
REQUEST FOR HEARING

Unless changes to the policy as requested through this letter are made, Williams Gallagher would wish for a hearing to be held to discuss the wording of Policy DDNP6 in light of objections being made by Inside Land Group Ltd through this letter and comments being made by South Norfolk Council.

Yours faithfully



Matthew Williams
WILLIAMS GALLAGHER



Major Modifications Consultation Response Form

If you, or someone you know, is unable to complete the online survey, you can print out this response form, complete it and post it to DDNP, c/o Diss Town Council, 11-12 Market Hill, Diss, Norfolk, IP22 4JZ.

**Please ensure your feedback is with Diss Town Council by the deadline date:
Thursday May 5th 2022.**

Your Name(s): Matthew Williams

Organisation (if applicable) Williams Gallagher

Your address: Somerset House, 37 Temple Street, Birmingham

Your postcode: B2 5DP

Your contact preference (email and or phone): matthew@williams-gallagher.com

Please indicate which of the following apply, by typing/writing an **X** next to your answer.

- I live in the DDNP area
- I work in the DDNP area
- I am a statutory consultee
- I am an agent X
- I am a landowner
- None of the above

Consent (you must complete this section)

A summary of all comments made will be publicly available. Please note that any other personal information provided will be confidential and processed in line with the Data Protection Act 1998 and General Data Protection Regulations. Diss Town Council (as the lead council) will process your details in relation to the preparation of this document only. The Privacy Statement can be found [here](#).

As part of the Consultation and in line with the new General Data Protection Regulations (GDPR) please confirm that you are happy for the Diss Town Council to pass on your contact details (name, address/email address) onto South Norfolk Council (as the lead Local Planning Authority) so that they can contact you at Regulation 16 consultation. *

I consent to Diss town Council (as the lead council) processing my details in relation to this preparation of the Neighbourhood Plan

Please write/type 'yes' against this statement to show you agree: Yes

I consent to Diss town Council passing my contact details to south Norfolk Council (as the lead Local Planning Authority)

Please write/type 'yes' against this statement to show you agree: Yes

Please leave any comments you may have in relation to this Major Modifications Consultation Document in the space below. You are welcome to continue on a separate sheet if you need more space. Thank you, your participation in this consultation is very much appreciated.

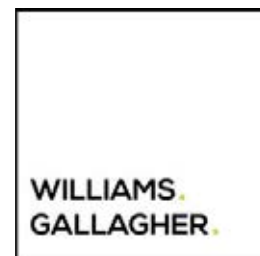
1. Do you have any comments in relation to major modification 1 – Amended Policy: Scale and location of housing growth? Yes.

Please see attached letter of representation

2. Do you have any comments in relation to major modification 2 – New Policy: Regeneration of the Waveney Quarter, Diss? No

3. Do you have any comments in relation to major modification 3 – New Policy: Diss Business Park? No
4. Do you have any comments in relation to major modification 4 – New Policy: Surface Water Management? No
5. Do you have any comments in relation to major modification 5 – Amended Policy: Local Green Space? No

End of feedback form.



Williams Gallagher
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B2 5DP

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m: 07375 041 974

e: matthew@williams-gallagher.com

28 April 2022

DDNP Steering Group
Diss Town Council
11-12 Market Hill
Diss
IP22 4JZ

Sent by Email: ddnp@diss.gov.uk

Dear Sirs

**DISS AND DISTRICT NEIGHBOURHOOD PLAN – REG 14 MAJOR MODIFICATIONS
OBJECTION SUBMITTED ON BEHALF OF INSIDE LAND GROUP
LAND AT DENMARK LANE (DIS3 NOW DDNP6)**

Williams Gallagher is instructed by Inside Land Group to submit this objection to the Diss and District Neighbourhood Plan (DDNP) in relation to the proposed reduction in the number of dwellings attributable to the proposed allocation at Land off Denmark Lane, Diss DDNP6 (formerly identified as Site DIS3) (“the Site”).

The Site is one of several draft allocations proposed to have their identified dwelling capacity reduced through this second round of Regulation 14 Consultation. This is at the same time as a new housing allocation proposal is being introduced in Scole.

The general reason for the proposed changes to proposed allocations are stated as being:

- *the overall level of housing growth required through the allocations in Diss has reduced due to recent planning permission, which includes the Churchill development for 73 retirement homes on land behind Thatcher’s Needle*
- *further assessment work to determine the suitability of each site and its ability to accommodate the level of growth proposed*

The Site allocation was in part recognition of the site being an allocation in the South Norfolk Local Plan (SNLP) Site Allocations and Policies Document (adopted in 2015) such that the principle of development was accepted and the development expected to come forward during the emerging DDNP timeframe. The differences between the policy allocation of the original Reg 14 Pre-Submission version of the DDNP and the Major Modifications are shown in the table below:

Provision	Reg 14	Reg 14 Major Modifications
Site Area	1.6ha	1.6ha
Site Capacity	42	25
Access	Make footway improvement and provide road access from Denmark Lane without impinging on Roydon Loke (see DDNP06) which is part of the DDNP Green Corridors and a well-used pedestrian/cycle route from Roydon to Diss.	

Provision	Reg 14	Reg 14 Major Modifications
Landscape	10m landscape belt on western boundary to provide soft edge to settlement	20m landscape belt on western boundary to protect landscape value of strategic gap and provide soft edge to settlement
Amenity/Play	-	Provide open amenity play space on site to serve development and contribute to local facilities.
Street Lighting	To accord with Dark Skies Policy 4(d)	
Roydon Parish Council	To be consulted at each stage as planning progresses	-
Drainage	Waste water infrastructure capacity must be confirmed prior to development taking place	-
	Incorporate opportunity to improve surface water run off rates, particularly in new site access/egress points where there is known high flood risk on adjacent roads.	
Minerals	Minerals/Waste Core Strategy CS16 applies – site underlain by safeguarded mineral resources	

The changes proposed have been based on the evidential information produced to support the plan. This includes the Site Options and Assessment 2022 Additional Sites Focused Report 2022(SOA3) prepared for the Council by AECOM. This report is to be read in conjunction with previous Site Options and Assessment Reports prepared in 2019 (SOA1) and 2020 (SOA2). Neither of the latter two of these documents considered this site as it was already an existing local plan allocation. All such allocations were noted by the HELAA (2017)¹ produced as part of the initial work to prepare the emerging Greater Norfolk Local Plan (GNLP). As part of the site assessment methodology, the HELAA stated at para 3.4 of the report:

*"In terms of both **housing and employment allocations**, the local plan documents which make the allocations are all relatively recently adopted, all having been through the examination process in the last four years and adopted in the last three years. These plans all run to at least 2026, with some sites in Broadland's Growth Triangle area Action Plan extending beyond 2026. **As such it is considered reasonable to assume that such recently tested sites are capable of delivery by 2036.**"*

Para 3.6 of the HELAA stated:

"Consequently, sites with permission and unimplemented allocations have not been assessed through the HELAA and the assessment of capacity in the HELAA works from the assumption that the commitment as at 1 April 2017 will be delivered in its entirety."

¹ Housing and Economic Land Availability Assessment (HELAA) Dec 2017

As an existing commitment and allocation, the site is not considered by either SOA1 or SOA2. SOA2 noted that the emerging GNLP *“Policy 7.2 The Main Towns” states that within Diss (with part of Roydon adjacent to Diss) there are 343 new homes on sites that are already allocated* [emphasis added] *for proposed residential development and 400 new allocations”* (SOA2 Executive Summary). For the purposes of these representations, SOA2 was therefore acknowledging the capacity of the existing allocations (which includes the Site as allocation DIS3) as part of the housing target.

Throughout it is clear that the evidence base for the preparation of the DDNP accepted that the allocation was contributing to the required housing numbers and reliance was being placed upon the higher order plan for the allocation.

SOA3 also noted at para 2.37 that Policy 7.2 identifies a total housing commitment of 763 dwellings for Diss including 400 dwellings to be delivered through new allocations. As only 400 are to be delivered through NEW allocations, the remainder must have either already been developed or are to be provided through the existing committed allocations including DIS 3. If this is the case, then the identified predicted capacity must have been taken into account during the assessment of the housing requirement. For DIS3, this must have been the 42 dwellings capacity identified through the SNLP/Reg 14 DDNP.

Unless there are strong evidential reasons to the contrary, the extant provisions should be carried forward.

We therefore turn to the Site Options and Assessment Report (SOA3). The methodology for the site assessment does not indicate that, in any of the considerations, the view of the site owner or promoter/developer were sought as part of the assessment. This would have provided up to date information of land owner/developer intentions for the Site.

The SOA3 Assessment of the Site includes:

Table 2 Sites identified for assessment

Site Ref.	Site Name	Parish	Area (Ha)	Source	Relevant Planning History	Assessment Required for this SOA
DIS3	Land off Denmark Lane (Roydon parish)	Roydon	1.6	Allocations from the adopted South Norfolk Local Plan Site Specific Allocations and Policies Document (October 2015)	No recent or relevant planning applications	Full Site Assessment using the standard site appraisal proforma

Table 2 – which notes the site allocation in the SNLP but notes that there has not been a recent/relevant planning application. An assessment was therefore proposed.

Table 3 – provides a summary of the site assessment undertaken as a result, as shown below and does not propose or justify any reduction in site capacity:

Site Ref.	Site Name	Area (Ha)	2022 Neighbourhood Plan Site Assessment Summary	Assessment of suitability for allocation
DIS3	Land off Denmark Lane (Roydon parish)	1.6	To be read in conjunction with Appendix C This is a greenfield site located to the west of the town. The site has a medium risk of surface water flooding which would need to be a consideration in the design of a development scheme. This site meets both emerging and adopted Local Plan policy. This previous Local Plan allocation for 42 dwellings is appropriate to carry forward for allocation in the Neighbourhood Plan.	Suitable for development of 40 dwellings

The Assessment in the Appendix C includes the following summary of the Site:

Summary of justification for rating

This is a greenfield site located to the west of the town. The site has a medium risk of surface water flooding which would need to be a consideration in the design of a development scheme. This site meets both emerging and adopted Local Plan policy.

This previous Local Plan allocation for 42 dwellings is appropriate to carry forward for allocation in the Neighbourhood Plan.

The allocation of sites to meet the housing requirement should be based upon the latest available evidence. 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. As an existing allocated site, it has been tested at inquiry and been found to be suitable, available and achievable and capable of delivering the identified dwelling numbers.

Nothing within the assessment identifies or justifies the reason for the proposed changes to the Policy allocation which are therefore considered to be arbitrary and without evidential basis. The Site should continue to be allocated within the dwelling capacity as originally identified by the SNLP and, as previously through the Neighbourhood Plan.

Furthermore, the decision that has been made through consideration of the SOA3 has led to the need for additional land to have to be released through the DDNP. The new site is in a lower order settlement than Diss and therefore does not benefit from the same direct level of services as the Diss sites and is in a less sustainable location not being directly served by rail as well as public transport. Its development is therefore likely to result in more car journeys than the Diss sites. Furthermore, SOA3 identifies the new site (DDNP11) as a lower preferential site than the DIS 3 (it being classified as amber in the assessment as opposed to DIS 3 which is green) and to be subject to a greater level of potential constraints that will need to be addressed including limited access, greater risk of flooding, effect on public rights of way, the site being within a Woodland Priority Habitat Network, nearby heritage assets and that the site itself is not defined by recognisable physical boundaries. The disbenefits of/constraints to its development therefore considerably and demonstrably outweigh those of DIS3. Its allocation is therefore considered to be contrary to the principles of the NPPF and it should be deleted in favour of the continued allocation of DIS 3 for development to its full capacity as identified in the SNLP.

We will be continuing to make these representations as part of the Regulation 16 consultation to be held by the local planning authority following any submission of the plan to them and request that you notify us of your submission of the plan to them.

Yours sincerely




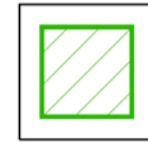
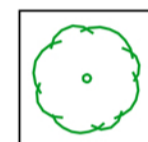
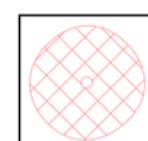
Matthew Williams
WILLIAMS GALLAGHER

ACCOMMODATION SCHEDULE

HOUSE TYPES			STOREYS	AREA (m ²)	AMOUNT
1A	1B/2P	MAISONETTE	2	57.50	06
2A	2B/3P	MAISONETTE	2	72.50	04
2B	2B/4P	HOUSE	2	79.12	22
3A	3B/6P	HOUSE	2	102.2	15
				TOTAL	47

PUBLIC OPEN SPACE = 4098m²
 PARKING, 1 BEDS - 1.5 SPACES, 2+3 BEDS - 2 SPACES

KEY

-  PROPOSED TREE
-  POS
-  RETAINED EXISTING TREE/VEGETATION
-  REMOVED EXISTING TREE/VEGETATION

10m LANDSCAPE BELT TO WESTERN BOUNDARY

PUBLIC PEDESTRIAN LINK

INFORMAL FOOTPATH

G2(C)

G3(C)

G4(C)

G1(C)

T4(C)

T1(A)
Fen View Close

T3(A)

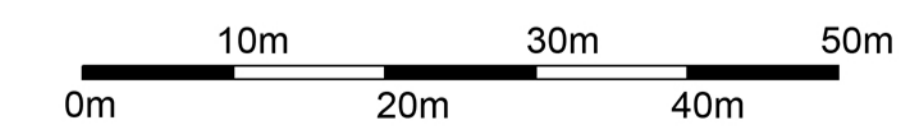
T2(B)

2.0m X 43m VISIBILITY SPLAY

2.4m X 43m VISIBILITY SPLAY

TREES / HEDGEROW TO BE REMOVED

NEW 2m WIDE FOOTPATH TO DENMARK LANE



PLANNING

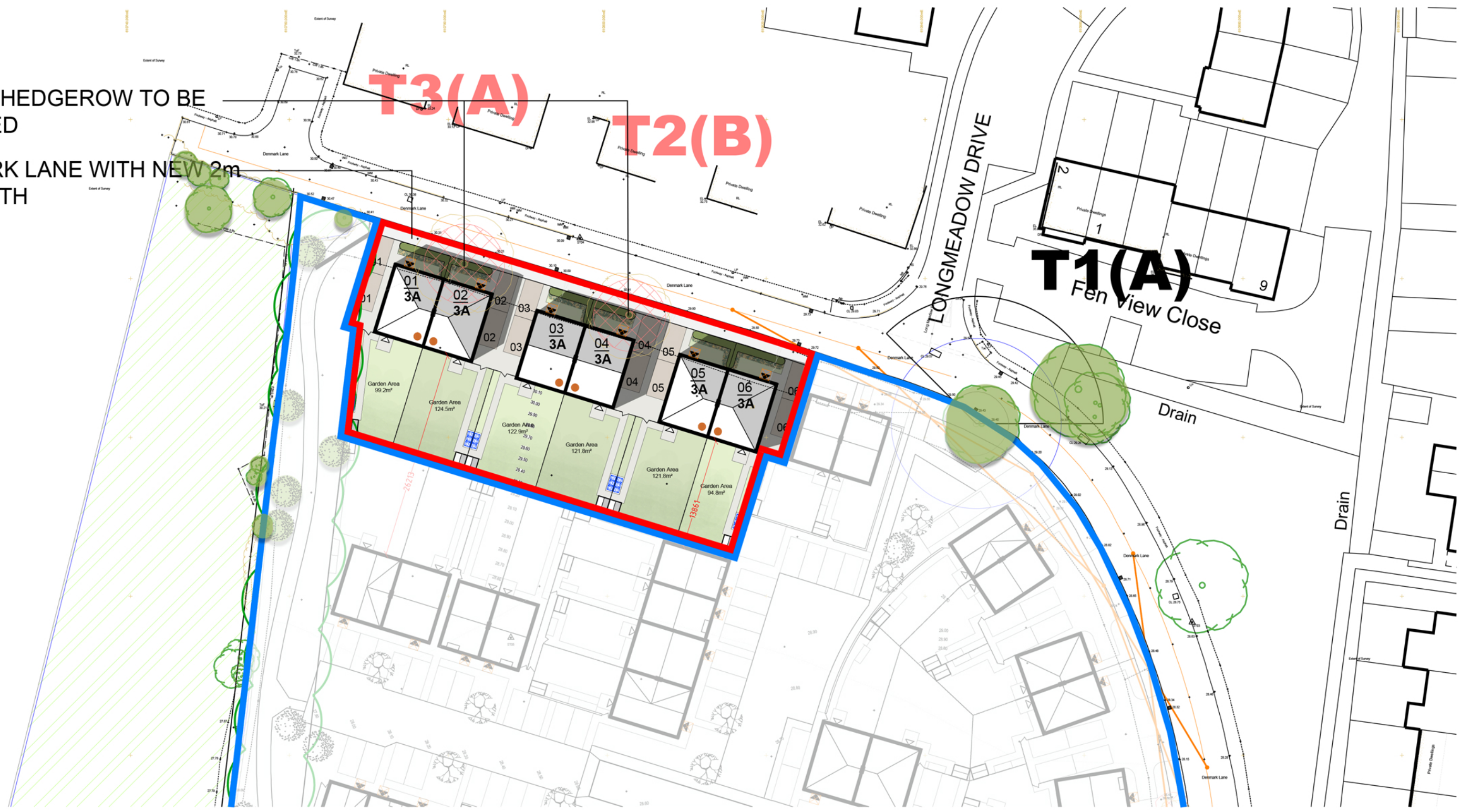


Notes	Revision	Date	By	Chkd	CDM Notes
Copyright in this drawing remains the property of BM3 Architecture Limited.	K. Plots 24-26 rotated 90°. Redline along Denmark Lane adjusted to meet the back of the footpath. Footpath extended around existing tree to the north as discussed at DTM.	27.09.22	JJ	JJ	
Do not scale this drawing unless for the purposes of verifying or determining any Planning Application.	L. Updated to include comments on private drive turning head and extend of adopted turning head.	05.07.22	BR	JJ	
Contractors and consultants are to advise BM3 Architecture Limited of any discrepancies.	M. Updated to include latest information on Suds, easement and turning head.	02.07.22	BR	JJ	
	N. Access to front door and rear garden of plot 8 amended.	13.09.22	BR	JJ	
	P. Updated to add gate to gardens, strategy for private and public space.	16.09.22	BR	JJ	
	Q. Minor tweaks to the layout.	23.09.22	BR	JJ	
	R. Minor tweaks to the layout.	27.09.22	BR	JJ	
	S. Updated to include latest comments and elements from landscape strategy.	07.10.22	BR	JJ	

Project LAND AT DENMARK LANE DISS		Drawing SITE LAYOUT		Client INSIDE LAND GROUP	
Scale 1:500@A1	Dated DEC 2020	Job No. 71327	Drawing No. D01	Drawn by JJ	Checked JJ
Birmingham Office 28 Pickford Street, Digbeth, Birmingham, B5 5QH T: 0121 633 0000 F: 0121 633 0300 E: design@bm3.co.uk			CiStb Element PLANNING		Revision S

TREES / HEDGEROW TO BE REMOVED

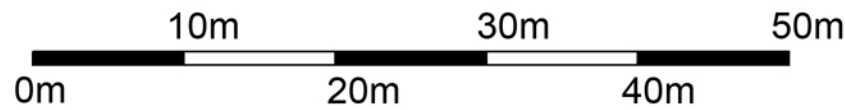
DENMARK LANE WITH NEW 2m FOOTPATH



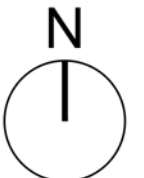
ACCOMMODATION SCHEDULE

HOUSE TYPES	STOREYS	AREA (m ²)	AMOUNT
● 3A 3B/6P HOUSE	2	102.2	06
		TOTAL	06

PARKING, 3 BEDS - 2 SPACES



PLANNING



Notes - Copyright in this drawing remains the property of BM3 Architecture Limited. - Do not scale this drawing. "unless for the purposes of verifying or determining any Planning Application". - Contractors and consultants are to advise BM3 Architecture Limited of any discrepancies.	Revision A. Minor tweaks to the layout. B. Updated to include latest comments and elements from landscape strategy.	Date 27.09.22 07.10.22	By BR BR	Chkd JJ JJ	Project LAND AT ROWDEN WAY DISS		Drawing SITE LAYOUT		Client INSIDE LAND GROUP	
					Scale 1:500@A3	Dated DEC 2020	Job No. 71327	Drawing No. D100	Drawn by BR	Checked JJ



Cabinet Agenda

Members of the Cabinet:

Cllr J Fuller (Chairman)	Leader, External Affairs and Policy
Cllr K Mason Billig (Vice Chairman)	Governance and Efficiency
Cllr A Dearnley	Finance and Resources
Cllr R Elliott	Customer Focus
Cllr G Minshull	Clean and Safe Environment
Cllr L Neal	Stronger Economy
Cllr A Thomas	Better Lives

Date & Time:

Monday 31 October 2022
9.00 am

Place:

To be held in the Council Chamber at South Norfolk House, Cygnet Court, Long Stratton, Norwich, NR15 2XE

Contact:

Claire White tel (01508) 533669
Email: committee.snc@southnorfolkandbroadland.gov.uk
Website: www.southnorfolkandbroadland.gov.uk

PUBLIC ATTENDANCE:

This meeting will be live streamed for public viewing via the following link:

<https://www.youtube.com/channel/UCZciRqwo84-iPyRlmsTCIng>

If a member of the public would like to observe the meeting in person, or speak on an agenda item, please email your request to committee.snc@southnorfolkandbroadland.gov.uk, no later than 5.00pm on Wednesday 26 October 2022.

Large print version can be made available

If you have any special requirements in order to attend this meeting, please let us know in advance.

Cabinet agreed that the document was an excellent, thorough and well thought out plan, which had been a pleasure to read. Referring to the modifications, the Chairman felt that these had only been minor and added clarity in some areas.

It was

RESOLVED:

To approve each of the recommended modifications to the Tivetshalls Neighbourhood Plan, as detailed within the examiner's report, and publish a Decision Statement setting out the Council's response and announcing the intention for the Neighbourhood Plan to proceed to a referendum.

The Reason for the Decision

Cabinet is satisfied with the recommended modifications from the independent examiner.

Other Options Considered

None

3039 DISS & DISTRICT NEIGHBOURHOOD PLAN SUBMISSION

Members considered the report of the Senior Community Planning Officer, which presented Cabinet with the latest version of the Diss and District Neighbourhood Plan and sought agreement to take it through to the next stages of consultation and independent examination.

Members noted that the Plan covered seven different parishes, two district councils and straddled two counties, which made the Plan particularly complex and unique. It had been in the planning for approximately seven years, and Cabinet commended its depth and complexity, and congratulated all those who had been involved in its production.

In response to queries, the Senior Community Planning Officer explained that a programme of activity had been established with colleagues in Mid Suffolk, to ensure that the appropriate decision making and consultation were in sync.

With regard to CIL, the Place Shaping Manager explained that he expected any funds due to be paid to the individual town or parish, and that there was no indication at present, that they were looking to pool funding. However, there was scope to negotiate joint projects, if required. The Chairman stressed the need for clarity and for ground rules to be set at an early stage.

A member referred to the proposal within the Plan to include the Mid Suffolk parishes of Brome, Oakley, Palgrave and Sturston in South Norfolk Council's affordable housing cascade, and queried whether this was feasible. In response, the Housing and Wellbeing Senior Manager explained that this was possible and could be achieved, but would require officers to work with the

neighbouring authority to ensure that there was a fair distribution of houses and was in the best interests of all residents.

During further discussion, the Chairman referred to the reference made in the Plan to the Greater Norwich Indoor Sports Facilities Strategy, and he advised that this had recently been updated by the GNDP. He also drew attention to Allocation DDNP16, the Feather Mills site, south of Park Road, in Diss. He had heard that the owners of the site had gone in to liquidation, and suggested that as a material change to the ownership of the land, this required investigation. The Senior Community Planning Officer agreed to raise this as part of the consultation process.

It was

RESOLVED:

To agree:

1. That the submitted Diss & District Neighbourhood Plan meets the requirements of Part 6 of Schedule 4B of the Town and Country Planning Act 1990.
2. That the Neighbourhood Plan can therefore proceed to consultation, in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012, and subsequently to an independent examination.
3. That the proposed South Norfolk Council response, as detailed in Appendix 2 of the report, is formally submitted as part of the Regulation 16 consultation report (subject to minor amendments).

The Reason for the Decision

The Plan has met the assessment criteria and should therefore progress through to the next stage of consultation and independent examination.

Other Options Considered

None.

3040 UPDATE TO THE LOCAL DEVELOPMENT SCHEME

Members considered the report of the Place Shaping Manager, which proposed amendments to the current Local Development Scheme (LDS), to reflect changes to the timetable for the Greater Norwich Local Plan, the South Norfolk Village Clusters Housing Allocations Plan (VCHAP) and the East Norwich Masterplan Supplementary Planning Document (SPD).

The Place Shaping Manager reminded members that this was a procedural document, and it was a statutory requirement to update the LDS regularly.



Diss & District
Neighbourhood Development Plan
Regulation 16 Submission Draft Consultation

December 2022



gladman.co.uk



01260 288888

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1 INTRODUCTION

1.1 Context

- 1.1.1 These representations provide Gladman's response to the Diss & District Neighbourhood Plan (DDNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012.
- 1.1.2 Gladman Developments Ltd specialises in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the Development Plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Local Plan and Neighbourhood Plan examinations.
- 1.1.3 Through these representations, Gladman provides an analysis of the DDNP, and the policy choices promoted within the draft Plan. Comments made by Gladman through these representations are provided in consideration of the DDNP's suite of policies and its ability to fulfil the Neighbourhood Plan Basic Conditions as established by paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) and supported by the Neighbourhood Plan chapter of the Planning Practice Guidance (PPG).

2 LEGAL REQUIREMENTS, NATIONAL POLICY & GUIDANCE

2.1 Legal Requirements

2.1.1 Before a neighbourhood development plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the DDNP must meet are as follows:

“(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.

(d) The making of the order contributes to the achievement of sustainable development.

(e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

(f) The making of the order does not breach, and is otherwise compatible with, EU obligations.

(g) Prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).”

2.2 National Planning Policy Framework

2.2.1 The National Planning Policy Framework 2021 (the Framework) sets out the Government’s planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role they play in delivering sustainable development to meet development needs.

2.2.2 At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through plan-making and decision-taking. This means that plan makers should positively seek opportunities to meet the

development needs of their area and Local Plans should meet objectively assessed housing needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood development plans.

- 2.2.3 PPG updates make clear that neighbourhood development plans should conform to national policy requirements and take account of the most up-to-date evidence. This is so that Diss Town Council (and the surrounding parishes of Burston & Shimpling, Roydon and Scole) can assist South Norfolk Council (SNC) in delivering sustainable development and be in accordance with basic condition (d) set out in paragraph 2.1.1 above.
- 2.2.4 The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 13 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.
- 2.2.5 Paragraph 15 further makes clear that neighbourhood plans should set out a succinct and positive vision for the future of the area. A neighbourhood plan should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.
- 2.2.6 Paragraph 29 of the Framework makes clear that a neighbourhood plan must be aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.

2.3 National Planning Policy Consultations

- 2.3.1 It is likely that any future proposals for planning change will be channelled through the prism of the government's levelling up agenda. The Neighbourhood Plan Steering Group should be cognisant, therefore, of the wider 'Levelling Up' agenda and consequential implications it could have on the planning system, including possible changes to the standard method which could have significant impacts on the level of growth required across the wider area.
- 2.3.2 The Town Council should be mindful of these changes and the potential impact to the DDNP and the need to undertake a review of the neighbourhood plan following the Plan's adoption. Further details on this matter are set out in section 3 of these representations.

3 RELATIONSHIP TO LOCAL PLANS

3.1 Adopted Development Plan

3.1.1 To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan.

3.1.2 The adopted Development Plan relevant to the preparation of the DDNP and the Development Plan which the DDNP will be tested against is the South Norfolk Local Plan consisting of the Joint Core Strategy and the Site Specific Allocations (adopted March 2011) and Policies Document (adopted October 2015). These are the overarching planning policy documents for South Norfolk and form the basis for decision making process in relation to all planning applications looking forward to 2026, or such a time as it, or elements of it are superseded.

3.2 Emerging Development Plan

3.2.1 Gladman is sure the Steering Group has been keeping close watch of the Greater Norwich Local Plan Examination proceedings that have occurred over 2022 and will respond according to any changes required as a result, but we use this opportunity to outline the status of the emerging Development Plan.

3.2.2 In March 2022, Natural England issued advice in relation to development that may increase phosphorous levels in the catchment of the River Wensum Special Area of Conservation (SAC). Any development that increases phosphorous levels in this catchment, covering much of the Greater Norwich area cannot be granted planning permission until development can demonstrate that it is nutrient neutral.

3.2.3 As the largest settlement unaffected by the issue within the Greater Norwich area, Diss may be required to assist in the further delivery of housing than that currently proposed within the plan. This is notwithstanding other changes sought to the GNLP by representors through the examination.

4 DISS AND DISTRICT NEIGHBOURHOOD PLAN

4.1 Introduction

4.1.1 This section is in response to the DDNP consultation document and its supporting evidence base.

4.2 Vision and Aims

4.2.1 In principle, Gladman supports the DDNP's vision which seeks to ensure a vibrant community around a thriving market town. Furthermore, Gladman support the aims of the Plan particularly Aim 1 which seeks to allocate the required housing growth across the neighbourhood plan area to meet the needs of current and future residents. Several of the other aims can also be delivered through the allocation of sustainable sites for residential development.

4.3 Policy 1: Scale and Location of Growth

4.3.1 In principle, Gladman supports the Town Council's decision to allocate 18 sites across the neighbourhood area to meet its development needs over the plan period. However, Gladman wishes to state that consideration of the following matters is required to provide clarity to this policy.

4.3.2 Firstly, a number of sites to be allocated already benefit from a grant of planning permission, which if implemented at the time of submission of the neighbourhood plan will no longer need to be allocated and should instead be recognised as commitments/completions towards the development target instead, similar to the reasons for the deallocation of land behind Thatcher's Needle.

4.3.3 As has been set out previously there may be a need for Diss to accommodate further development. Gladman suggests that land south of Burston Road, Diss is suitable for allocation in this event through the neighbourhood plan for the reasons set out below. Furthermore, a number of sites proposed for allocation are subject to existing uses such as DDNP03 (existing leisure centre) and DDNP04 (existing employment

allocation) which cannot be considered as an allocation due to the fact it is not currently available for development.

- 4.3.4 The fact that these sites have not yet come forward for 6 years since their initial inclusion in the adopted plan suggests that it is unlikely that they are now available for development. Accordingly, the Town Council may wish to reconsider its evidence base in the context of alternative sites which are currently available for development.
- 4.3.5 Secondly, as submitted to the previous Main Modifications Consultation, Gladman has some concerns regarding the evidence based produced to support the DDNP's spatial strategy.
- 4.3.6 Whilst welcoming that land interests being promoted by Gladman (Land south of Burston Road, Diss (Site GNLP4049)) has now been assessed through the SEA process, we do not consider the suite of SEA documents to present a robust assessment. Assessment is limited to an appendix to the SEA addendum and no comparative assessment against the baseline or against other development options has been undertaken. This should be rectified with further wider SEA based work for the settlement of Diss before submission of the neighbourhood plan to the Council under Regulation 15.
- 4.3.7 Land south of Burston Road is currently discounted from allocation due to community preference and local knowledge regarding local highways. This should be supported by evidence or the plan as whole may fail to demonstrate the SEA requirements have been met, which in turn would mean that basic condition (f). This draws similarities with the Stonegate Judgement¹.
- 4.3.8 This is a significant judgement identifying that:
1. It is incumbent on plan makers, the independent Examiner and the making authority that the Plan is compliant with EU legislation.

¹ R. (Stonegate Homes Ltd) v Horsham District Council and Henfield Parish Council [2016] EWHC 2512 (Admin)

2. The plan maker is required to undertake an objective assessment of the policies of the plan when discharging the duty above.
3. That alternatives need to be accurately presented in order for the SA/SEA of a Plan to comply with European legislation.
4. All key policies of the plan need to be assessed against reasonable alternatives to have an EU law compliant SA/SEA.

4.3.9 Gladman considers that this is a key issue for the Examination of the DDNP.

4.4 Policy 4: Housing Mix

4.4.1 Gladman supports Policy 4 and its intention to provide a range of housing types to meet local housing needs. Gladman welcomes the flexibility included in g) which recognises that plots which do not sell within a period of time (12 months of initial promotion), are able to revert back to the house builder to be developed for alternative housing types to ensure no delays occur on site delivery.

4.4.2 It is also important to recognise that housing mix should be driven by local need, evidenced robustly and flexible should issues of viability arise.

4.5 Policy 5: Affordable Housing

4.5.1 Gladman supports the inclusion of an affordable housing, but as with market housing, the tenure mix should be informed by local need and robustly evidenced.

4.6 Policy 6: Design

4.6.1 In principle, Gladman support Policy 6 which sets out a number of standards to ensure that development within the DDNP area demonstrates high quality design. Notwithstanding this, the wording of criterion b) which requires the delivery of 'demonstrable net biodiversity gain' should be amended for clarity. The Environment Bill requires biodiversity net gain of 10% and this should be clearly referenced in the policy wording. The use of subjective wording could lead to conflicting decisions in the decision making process.

4.7 Policy 8: Green Corridors and Biodiversity Enhancement

4.7.1 Gladman generally welcomes the amendments to the second paragraph of this policy, which is written in a tone in line with the ethos of the NPPF. However, Gladman consider it inappropriate for the policy to require 'measurable net gains in biodiversity which *exceed* national or local policy requirements' [*emphasis added*]. This is not suitably or robustly evidenced as a need and there is no mechanism for flexibility within the policy. Gladman recommend the following wording:

"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 in line with national and local requirements, or qualitative improvement to the corridor".

4.8 Policy 14: Strategic Gap Between Diss and Royston

4.8.1 Policy 14 allocates an area of separation between the built up areas of Diss and Roydon village. Gladman disagrees with the use of strategic gap policies as they can prevent otherwise sustainable development from coming forward. The policy should be reworded to ensure flexibility so that the DDNP can respond suitably should there be a drop in housing land supply. The designation should not be used to arbitrarily restrict suitable and sustainable locations for development from coming forward and policy wording must reflect this.

5 SITE SUBMISSION PROFILE

5.1 Land at Burston Road, Diss

5.1.1 Gladman is promoting Land at Burston Road, Diss for residential development through the Greater Norwich Local Plan. The Site extends to around 20ha in area and at this stage Gladman are open to discussion around scale and potential community benefits. Figure 1 below shows the extent of the land being promoted by Gladman through this process.

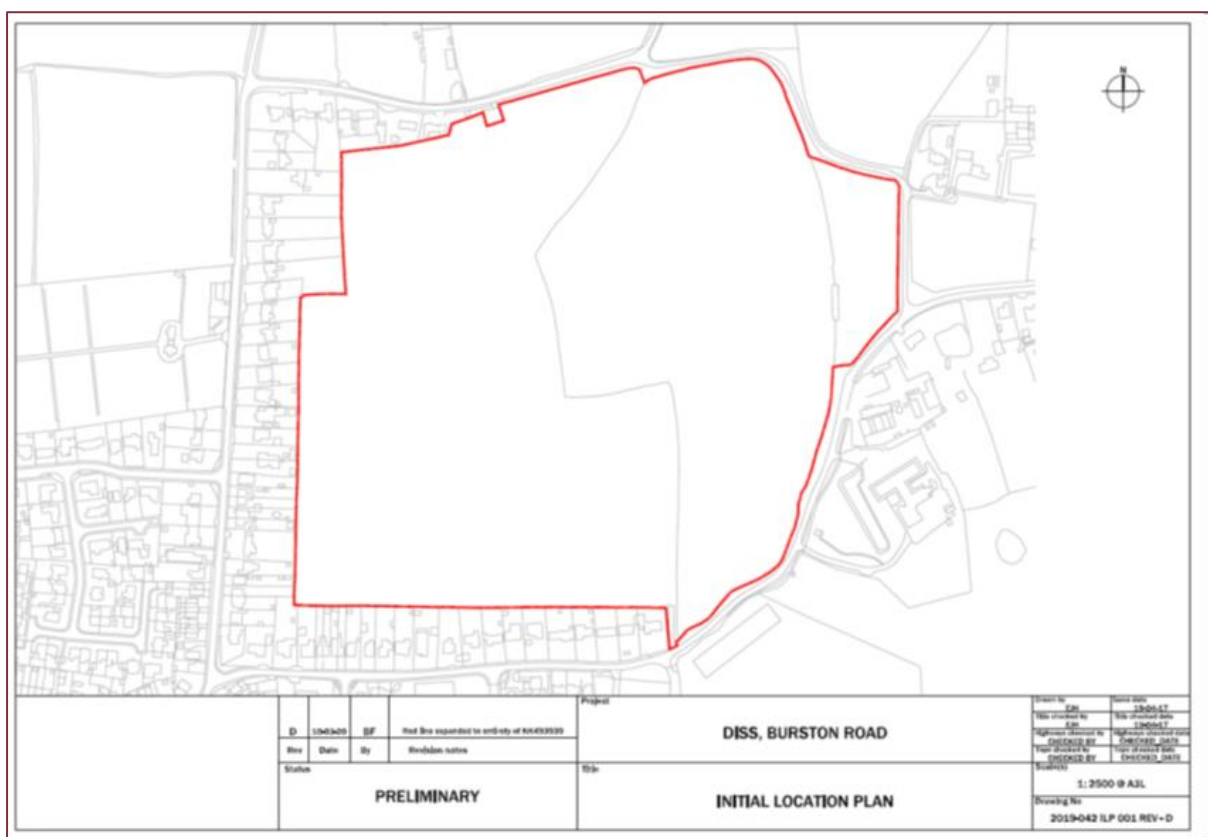


Figure 1: Land at Burton Road, Diss

5.1.2 As part of our proposals, and due to the proximity of the site to Diss High School, Gladman is willing to provide land for educational purposes and are open to discussions in this regard. An initial concept plan prepared to illustrate how the Site may come forward for development is included at Appendix 1 of this representation. The concept plan confirms to a high level the constraints and opportunities, as well

as outlines the benefits which the development may bring to the local area and wider plan area.

5.1.3 Gladman can confirm the availability of Land off Burston Road, Diss for development now. Gladman is engaged in a promotional agreement with the landowners to deliver the Site, and as such can confirm that the landowners support the development of the Site. The Site is not subject to any tenancies or covenants which would delay or prevent the development of the Site.

5.1.4 If allocated within the Neighbourhood plan, the development of Land at Burston Road, Diss could deliver significant benefits to the local area and wider community, including:

- Development of an appropriate scale for its location, providing for a wide range of tenure, size and types of new homes to meet identified housing needs;
- The delivery of policy compliant affordable homes;
- Land available for education uses to be discussed with relevant parties;
- Child play provision inclusive of a LEAP;
- A Country Park for the enjoyment of new and existing residents; and
- Potential highways improvements along with pedestrian and cycling links/improvements helping to meet some of the objectives of the neighbourhood plan.

6 CONCLUSIONS

6.1 Summary

- 6.1.1 Gladman welcomes the opportunity to comment on the Submission Draft of the DDNP. These representations have been drafted with reference to the revised National Planning Policy Framework (2021) and the associated updates that were made to Planning Practice Guidance.
- 6.1.2 Gladman has provided comments on a number of the issues that have been identified in the Council's consultation material and recommend that the matters raised are carefully explored during the process of examining the DDNP.
- 6.1.3 We hope you have found these representations informative and useful towards the preparation of the Diss and District Neighbourhood Plan and Gladman welcomes any future engagement with the Council to discuss the considerations within forwarded documents.

APPENDICES

Appendix 1: Land at Burston Road Framework Plan





From: [Planning Department](#)
To: [Neighbourhood Plans](#)
Subject: RE: Diss & District Neighbourhood Plan - Reg. 16 Consultation by South Norfolk Council and Mid Suffolk District Council
Date: 16 December 2022 09:50:21
Attachments: [image001.png](#)
[image012.png](#)
[image017.png](#)
[image009.png](#)
[image011.png](#)
[image014.png](#)
[image016.png](#)
[21_04763_P.pdf](#)
[20220505_4 DDNP Reconsultation FINAL.pdf](#)

Our Ref: 21_04763_P

Good morning,

Thank you for consulting the Water Management Alliance on the Diss & District Neighbourhood Plan.

After reviewing the information submitted on the portal, the Board has no further comments to make. Therefore, our comments sent on both the 09/07/2021 and 05/05/2022 (PDF's attached for reference) still stand.

Kind regards,

Ellen



Ellen Moore, BSc (Hons)

Sustainable Development Officer


Water Management Alliance

dd: 01553 819630 | ellen.moore@wlma.org.uk

Registered office: Pierpoint House, Horsley's Fields, King's Lynn, Norfolk, PE30 5DD
 t: 01553 819600 | e: info@wlma.org.uk | www.wlma.org.uk

WMA members: [Broads Drainage Board](#), [East Suffolk Drainage Board](#), [King's Lynn Drainage Board](#), [Norfolk Rivers Drainage Board](#), [South Holland Drainage Board](#), [Waveney, Lower Yare and Lothingland IDB](#) in association with [Pevensey and Cuckmere Water Level Management Board](#)

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[With our commitment to ISO 14001, please consider the environment before printing this e-mail.](#)

From: Richard Squires <Richard.Squires@southnorfolkandbroadland.gov.uk>

Sent: 02 November 2022 08:03

To: Neighbourhood Plans <neighbourhoodplans@southnorfolkandbroadland.gov.uk>

Subject: Diss & District Neighbourhood Plan - Reg. 16 Consultation by South Norfolk Council and Mid Suffolk District Council

Dear Sir / Madam,

Please find attached a letter providing details about the consultation on the submitted Diss & District Neighbourhood Plan, as required by Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended). This consultation is being carried out by South Norfolk Council and Mid Suffolk District Council and will take place between 9.00am on Wednesday 2nd November and 4.00pm on Friday 16th December.

If you have any queries, please do not hesitate to get in touch.

Yours sincerely,

Richard Squires

Richard Squires

Senior Community Planning Officer

t 01603 430637 e richard.squires@southnorfolkandbroadland.gov.uk



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Mr David Burns
Chairman of the Neighbourhood Plan Steering Group
Diss Town Council

Copy by email only to ddnp@diss.gov.uk

Our Ref: 21_04763_P

09.07.2021

Dear Mr Burns,

RE: Diss and District Neighbourhood Plan

Thank you for consulting the Water Management Alliance on the Diss and District Neighbourhood Development Plan 2021-2038 Regulation 14 Pre-Submission Final Version. Each Parish has some lands located within the boundary of the Internal Drainage District (IDD) of the Waveney, Lower Yare and Lothingland Internal Drainage Board (IDB). The Board's Byelaws therefore apply to those lands. The Board has joined the WMA group of member Boards recently and the Board's Byelaws and a map of the IDD will be available to view on the WMA website soon (<https://www.wlma.org.uk/waveney-idb/home/>).

In keeping with other WMA member Boards, the principal function of the Waveney, Lower Yare & Lothingland IDB is to provide flood protection within the Board's area. Certain watercourses within the IDD have been designated as 'Adopted Watercourses' by the Board. The adoption of a watercourse is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD and as such, will normally receive maintenance from the IDD.

For clarity, the River Waveney is classed as a Main River and it is therefore regulated by the Environment Agency.

The Board's rationale and approach towards managing flood risk and water levels within the IDD is set out in the WMA Group's Planning and Byelaw Strategy document (https://www.wlma.org.uk/uploads/WMA_Planning_and_Byelaw_Policy.pdf).

We note and support the community's commitment (Community Policy 2: Maintenance of Drainage Ditches) to work proactively with landowners and statutory agencies to ensure that drainage ditches are properly maintained so that they can continue to play their role in the management of future flood risk. The majority of watercourses within the Parishes are privately owned (also known as riparian or ordinary watercourses). It is therefore essential that landowners understand their rights and

responsibilities towards watercourse maintenance and we recommend making reference to the government guidance 'Owning a watercourse' published at <https://www.gov.uk/guidance/owning-a-watercourse>

In order to reduce potential conflict between the planning process and the Board's regulatory regime and consenting process please be aware of the points set out below.

Surface water discharge

The Board will comment on planning for all major developments (10 or more properties) within the IDD that are likely to discharge surface waters into a watercourse within the IDD. Under certain circumstances, some major developments outside the IDD boundary may also be regulated by the Board's byelaws. The Board will comment on minor development within the IDD based upon the criteria specified in the Planning & Byelaw strategy (see above).

The Plan identifies several proposed allocations within the Parishes. Of particular relevance to the Board are the proposed sites within the Parish of Diss (DIS2, DIS6, DIS7, DIS9, DDNP03, DDNP04 and DDNP05) and Oakley (DDNP12). These development sites are all located within the IDD boundary. As such, the following points are of significance:

- If a surface water discharge is proposed to a watercourse as part of any new development, then the proposed development will require land drainage consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging policy (https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf).
- If surface water from the new development are to be disposed of via infiltration, we would recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater. If on-site material were to be considered favourable then we would advise infiltration testing in line with BRE Digest 365 (or equivalent) to be undertaken to determine its efficiency. If (following testing) a strategy wholly reliant on infiltration is not viable and a surface water discharge is proposed to a watercourse, then the proposed development will require land drainage consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging policy (https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf).
- Any proposed discharge of surface water to a sewer from new developments should be in line with the drainage hierarchy (as per best practice) and is viable at the proposed location.

Discharge of treated foul effluent

- The discharge of treated foul water to a watercourse within the IDD requires land drainage consent in line with the Board's byelaws (specifically byelaw 3).

Alterations to a Board adopted watercourse

For any Board adopted watercourses within the IDD, the following points are of relevance:

- Any works within 7 metres of a Board adopted watercourse will require consent to relax Byelaw 10 (no obstructions within 7 metres of the edge of drainage or flood risk management infrastructure).
- If development proposals involve works to alter a Board Adopted watercourse, consent is required under Section 23 of the Land Drainage Act 1991 (and byelaw 4).
- If any development proposes to install services or make excavations within or alter the banks of a Board Adopted Watercourse, consent is required as per Byelaw 17 of the Board's Byelaws.

Alterations to riparian (ordinary) watercourses

- Should any development proposals include works to alter a riparian watercourse (including culverting for access), consent will be required under Section 23 of the Land Drainage Act 1991 (and byelaw 4). The Board is responsible for consenting this activity within the IDD, while Norfolk County Council (the Lead Local Flood Authority) is the regulatory body outside the boundary of the IDD.
- If any development involves installing services or making excavations within a Board Adopted Watercourse, or altering its banks, consent is required as per Byelaw 17 of the Board's Byelaws.

Whilst the consenting process as set out under the Land Drainage Act 1991 and the aforementioned Byelaws are separate from planning, the ability to implement a planning permission may be dependent on the granting of these consents. As such we strongly recommend that developers seek the necessary consent prior to determination of a planning application. The Board's officers are available to respond to queries and provide advice.

We trust that these comments are helpful towards the drafting of the Neighbourhood Plan.

Yours sincerely,

Ella

Ella Thorpe
Sustainable Development Officer
Water Management Alliance

Ms Stephanie Ayden
Project Officer of the Neighbourhood Plan Steering Group
Diss Town Council

Copy by email only to ddnp@diss.gov.uk

Our Ref: 21_04763_P

05.05.2022

Dear Ms Ayden,

RE: Diss and District Neighbourhood Plan – ‘Major Modifications’ Consultation

Thank you for reconsulting the Water Management Alliance on the Diss and District Neighbourhood Development Plan 2021-2038 ‘Major Modifications’ Consultation under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012. Our comments below will be in response to these ‘major modifications’ only. However, please also refer to our previous comments, dated 09.07.2022, as these comments still stand.

Major Modification 1: Amended Policy – Scale and location of housing growth

We note that the overall scale of housing growth within the Neighbourhood Plan has been modified as there has now been planning permission approved for a retirement home development (planning reference: 2021/1885). The Board provided site specific comments for this development on 31st August 2021 (our reference: 21_05149_P).

The new proposed allocation for 50 homes at Land East of Norwich Road, Scole (DDNP10), as well as the smaller housing allocation areas adjacent to the Internal Drainage District (IDD) of the Waveney, Lower Yare and Lothingland Internal Drainage Board - DDNP3, DDNP4 and DDNP5 - are within the Board’s Watershed Catchment (meaning water from the site will eventually enter the IDD).

If surface water from these new developments is to be disposed of via infiltration, we would recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater. If on-site material were to be considered favourable then we would advise infiltration testing in line with BRE Digest 365 (or equivalent) to be undertaken to determine its efficiency.

If (following testing) a strategy wholly reliant on infiltration is not viable and a surface water discharge proposed to a watercourse within the watershed catchment of the Board’s IDD then we request that this be in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS),

specifically paragraphs S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.

Major Modification 2: New Policy – Regeneration of Waveney quarter

Sites DDNP14 and DDNP15 are both within the Internal Drainage District (IDD) of the Waveney, Lower Yare and Lothingland Internal Drainage Board (IDB). Therefore, the Board's Byelaws apply. Please see the bullet points at the end of this letter which provide further information about consents required for these developments to take place.

Please note that the two proposed sites are adjacent to the River Waveney, which has a Main River designation. As such, we recommend that you also consult with the Environment Agency as the regulators of this watercourse.

Major Modification 3: New Policy – Diss Business Park

Diss Business Park is within the Internal Drainage District (IDD) of the Waveney, Lower Yare and Lothingland Internal Drainage Board (IDB). Although there are not any proposed developments highlighted within the Neighbourhood Plan at this site, should any developments take place in the future, the Board's Byelaws will apply. Please see the bullet points at the end of this letter which provide further information about consents required for these developments to take place.

Major Modification 4: Surface Water Management (including flood risk)

We strongly support the introduction of the new policy on surface water management. We note that any new developments or significant alterations are to be accompanied by an assessment of all sources of flooding and surface water drainage, and SuDS should be incorporated wherever feasible. We would advise infiltration testing in line with BRE Digest 365 (or equivalent) is undertaken to determine its efficiency.

For developments where SuDS methods are not viable and a surface water discharge is proposed to a watercourse or a sewer, we recommend that this be in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4. We recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.

If surface water discharge is proposed to a watercourse within the Internal Drainage District of the Waveney, Lower Yare and Lothingland IDB then the proposed development will require land drainage consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging policy.

Major Modification 5: Local Green Space

We support the policy to protect local green spaces from inappropriate development. Please note, Local Green Spaces: 12, 16, 24, 27, 28, 41 and 47 are within the Internal Drainage District of the Waveney, Lower Yare and Lothingland IDB. The Board's Byelaws apply to any permitted developments within these areas.

Local Green Spaces: 6, 7, 13, 28 and 49, are adjacent the Internal Drainage District of the Waveney, Lower Yare and Lothingland IDB. If any surface water discharge, from any permitted developments at these sites, is proposed to a watercourse within the Internal Drainage District of the Waveney, Lower Yare and Lothingland IDB then the proposed development will require land drainage consent in line with the Board's Byelaws (specifically byelaw 3).

The Board will comment on planning for all major developments (10 or more properties) within the watershed catchment of the IDB that are likely to discharge surface waters into a watercourse within the IDD. The Board will comment on minor development within the IDD based upon the criteria specified in the Planning & Byelaw strategy (available on our website: https://www.wlma.org.uk/uploads/WLYLIDB_Byelaws.pdf).

Of particular relevance to the Board are the proposed sites within Major Modification 2: Waveney quarter (DDNP14 and DDNP15) and any developments associated with Major Modification 3: Diss Business Park. These development sites are all located within the IDD boundary. As such, the following points are of significance:

Surface water discharge

- If a surface water discharge is proposed to a watercourse as part of any new development, then the proposed development will require land drainage consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging policy (https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf).
- If surface water from the new development are to be disposed of via infiltration, we would recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater. If on-site material were to be considered favourable then we would advise infiltration testing in line with BRE Digest 365 (or equivalent) to be undertaken to determine its efficiency. If (following testing) a strategy wholly reliant on infiltration is not viable and a surface water discharge is proposed to a watercourse, then the proposed development will require land drainage consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging policy (https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf).
- Any proposed discharge of surface water to a sewer from new developments should be in line with the drainage hierarchy (as per best practice) and is viable at the proposed location.

Discharge of treated foul effluent

- The discharge of treated foul water to a watercourse within the IDD requires land drainage consent in line with the Board's byelaws (specifically byelaw 3).

Alterations to a Board adopted watercourse

For any Board adopted watercourses within the IDD, the following points are of relevance:

- Any works within 7 metres of a Board adopted watercourse will require consent to relax Byelaw 10 (no obstructions within 7 metres of the edge of drainage or flood risk management infrastructure).
- If development proposals involve works to alter a Board Adopted watercourse, consent is required under Section 23 of the Land Drainage Act 1991 (and byelaw 4).
- If any development proposes to install services or make excavations within or alter the banks of a Board Adopted Watercourse, consent is required as per Byelaw 17 of the Board's Byelaws.

Alterations to riparian (ordinary) watercourses

- Should any development proposals include works to alter a riparian watercourse (including culverting for access), consent will be required under Section 23 of the Land Drainage Act 1991 (and byelaw 4). The Board is responsible for consenting this activity within the IDD, while Norfolk County Council (the Lead Local Flood Authority) is the regulatory body outside the boundary of the IDD.

- If any development involves installing services or making excavations within a Board Adopted Watercourse, or altering its banks, consent is required as per Byelaw 17 of the Board's Byelaws.

Whilst the consenting process as set out under the Land Drainage Act 1991 and the aforementioned Byelaws are separate from planning, the ability to implement a planning permission may be dependent on the granting of these consents. As such we strongly recommend that developers seek the necessary consent prior to determination of a planning application. The Board's officers are available to respond to queries and provide advice.

We trust that these comments are helpful towards the drafting of the Neighbourhood Plan.

Yours sincerely,

Ella

Ella Thorpe
Sustainable Development Officer
Water Management Alliance



Consultation Response Form

Diss & District Neighbourhood Plan 2021 - 2038

Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

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Printed copies of the DDNP have also been deposited at the following locations, where they can be viewed on request during normal opening hours:

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- **Stuston - Place Farm Shop**, Place Farm, Old Bury Rd, Stuston, IP21 4AD
- **South Norfolk Council – The Octagon**, 40 Mere Street, Diss, Norfolk, IP22 2AH

HOW TO SUBMIT YOUR COMMENTS

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- **Complete Section One** in full so that your representation(s) can be considered at the Examination stage.
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<https://www.southnorfolkandbroadland.gov.uk/data-protection/south-norfolk-council-data-protection>

<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

For Office use only: DD-035

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	Caroline Jeffery
Job Title (if applicable):	Principal Planner
Organisation / Company (if applicable):	Norfolk County Council
Address:	Norfolk County Council County Hall, Martineau Lane, Norwich
Postcode:	NR1 2SG
Tel No:	01603 222193
E-mail:	caroline.jeffery@norfolk.gov.uk

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

For Office use only:

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	DDNP17, 6, 15, 16, Policy 2
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input checked="" type="radio"/>	Oppose	<input type="radio"/>
Support with modifications	<input type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

The Minerals and Waste Planning Authority welcomes the wording within the Diss and District Neighbourhood Plan policies acknowledging the need for compliance with Norfolk Minerals and Waste Core Strategy Policy CS16 (or any successor policy) in the following Neighbourhood Plan policies:

- DDNP17 -Policy CS16 (or any successor policy) of the Norfolk Minerals and Waste Core Strategy (NMWCS), as this site is underlain by safeguarded mineral resources.
- DDNP6 -Policy CS16 (or any successor policy) of the Norfolk Minerals and Waste Core Strategy (NMWCS) applies, as this site is underlain by safeguarded mineral resources.
- POLICY DDNP15 -Policy CS16 (or any successor policy) of the Norfolk Minerals and Waste Core Strategy (NMWCS) applies, as this site is underlain by safeguarded mineral resources.
- POLICY DDNP16 -Policy CS16 (or any successor policy) of the Norfolk Minerals and Waste Core Strategy (NMWCS) applies, as this site is underlain by safeguarded mineral resources.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

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Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed: C Jeffery	Dated: 06/12/2022
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Consultation Response Form

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For Office use only: DD-036

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	Caroline Jeffery
Job Title (if applicable):	Principal Planner
Organisation / Company (if applicable):	Norfolk County Council
Address:	County Hall, Martineau Lane, Norwich
Postcode:	NR1 2SG
Tel No:	01603 222193
E-mail:	caroline.jeffery@norfolk.gov.uk

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

For Office use only:

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	DDNP6
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input type="radio"/>	Oppose	<input type="radio"/>
Support with modifications	<input checked="" type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

This policy requires the word "applies" to be added to the policy wording.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

Policy CS16 (or any successor policy) of the Norfolk Minerals and Waste Core Strategy (NMWCS) applies, as this site is underlain by safeguarded mineral resources.

(Continue on separate sheet if necessary)

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(Continue on separate sheet if necessary)

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The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
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Signed: C Jeffery	Dated: 06/12/22
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Consultation Response Form

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For Office use only: DD-037

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All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	Caroline Jeffery
Job Title (if applicable):	Principal Planner
Organisation / Company (if applicable):	Norfolk County Council
Address:	County Hall, Martineau Lane, Norwich
Postcode:	NR1 2SG
Tel No:	01603 222193
E-mail:	caroline.jeffery@norfolk.gov.uk

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

For Office use only:

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	DDNP17
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input type="radio"/>	Oppose	<input type="radio"/>
Support with modifications	<input checked="" type="radio"/>	Have Comments	<input type="radio"/>

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For Office use only: DD-038

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	Caroline Jeffery
Job Title (if applicable):	Principal Planner
Organisation / Company (if applicable):	Norfolk County Council
Address:	County Hall, Martineau Lane, Norwich
Postcode:	NR1 2SG
Tel No:	01603 222193
E-mail:	caroline.jeffery@norfolk.gov.uk

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

For Office use only:

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	Policy 3
---------------	--	------------	----------

Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input type="radio"/>	Oppose	<input type="radio"/>
Support with modifications	<input checked="" type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

This policy requires the word "applies" to be added to the policy wording.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

Policy CS16 (or any successor policy) of the Norfolk Minerals and Waste Core Strategy (NMWCS) applies, as this site is underlain by safeguarded mineral resources.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed: C Jeffery	Dated: 06/12/22
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Consultation Response Form

Diss & District Neighbourhood Plan 2021 - 2038

Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

Diss Town Council have submitted a Neighbourhood Plan (the 'DDNP') to South Norfolk Council and Mid Suffolk District Council. The Plan, which covers the Town and several surrounding parishes sets out a vision for the area and contains policies which it intends will be used to help determine planning applications where relevant. The submitted plan etc. can be found online at:

- www.southnorfolkandbroadland.gov.uk/ddnp
- www.midsuffolk.gov.uk/DissandDistrictNP

Printed copies of the DDNP have also been deposited at the following locations, where they can be viewed on request during normal opening hours:

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- **The Burston Crown**, Mill Rd, Burston, Diss IP22 5TW (Open 12:00-22:30 Wed-Sat)
- **Diss Library**, Church Street, Diss, IP22 4DD
- **Diss Town Hall**, 11-12 Market Hill, Diss, IP22 4JZ
- **Roydon - St. Remigius Church**, Roydon, Diss IP22 5RG
- **Scole Village Stores**, Assett House, The St, Scole, Diss IP21 4DR
- **Stuston - Place Farm Shop**, Place Farm, Old Bury Rd, Stuston, IP21 4AD
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HOW TO SUBMIT YOUR COMMENTS

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- **Complete Section Two**, identifying which paragraph / policy your comments relate to. You may comment on more than one part of the Plan but must make this clear. Use separate forms if necessary.
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It will not be possible to accept late representations

At the end of the consultation period, all comments received will be collated and then be forwarded on to the appointed Examiner. You should not assume that there will be further opportunities to introduce new information, although the Examiner may choose to seek clarity on certain matters.

Data Protection: All information collected and processed by South Norfolk Council and Mid Suffolk District Council at this stage is by virtue of our requirement under the N'hood Planning (General) Regulations 2012. All comments received will be made publicly available and may be identifiable by name / organisation. All other personal information will be protected in accordance with the Data Protection Act 2018. For more information on how we do this and your rights with regards to your personal information, and how to access it, please visit our websites or contact us at data.protection@southnorfolkandbroadland.gov.uk (SNC) or at customer.services@baberghmidsuffolk.gov.uk (MSDC).

<https://www.southnorfolkandbroadland.gov.uk/data-protection/south-norfolk-council-data-protection>

<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

For Office use only: DD-039

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	Caroline Jeffery
Job Title (if applicable):	Principal Planner
Organisation / Company (if applicable):	Norfolk County Council
Address:	County Hall, Martineau Lane, Norwich
Postcode:	NR1 2SG
Tel No:	01603 222193
E-mail:	caroline.jeffery@norfolk.gov.uk

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

For Office use only:

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	Local Green Space designation 11,40, 43 and 47
----------------------	--	-------------------	--

Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input checked="" type="radio"/>	Oppose	<input type="radio"/>
Support with modifications	<input type="radio"/>	Have Comments	<input checked="" type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

Please note, while Local Green Space allocations do not sterilise the mineral resource underlain, if a planning application was to be submitted for built development, then policy CS16 (or any successor policy) of the Minerals and Waste Local Plan would apply for the following Local Green Spaces:

- 11: Rectory Meadows, Diss
- 40: Billingford Common
- 43: Pocket Park, Scole
- 47: Scotland Wood, Scole

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

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Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed: C Jeffery	Dated: 06/12/22
--------------------------	------------------------



Consultation Response Form

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- **Diss Town Hall**, 11-12 Market Hill, Diss, IP22 4JZ
- **Roydon - St. Remigius Church**, Roydon, Diss IP22 5RG
- **Scole Village Stores**, Assett House, The St, Scole, Diss IP21 4DR
- **Stuston - Place Farm Shop**, Place Farm, Old Bury Rd, Stuston, IP21 4AD
- **South Norfolk Council – The Octagon**, 40 Mere Street, Diss, Norfolk, IP22 2AH

HOW TO SUBMIT YOUR COMMENTS

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- **Complete Section One** in full so that your representation(s) can be considered at the Examination stage.
- **Complete Section Two**, identifying which paragraph / policy your comments relate to. You may comment on more than one part of the Plan but must make this clear. Use separate forms if necessary.
- **E-mail your comments to:** neighbourhoodplans@southnorfolkandbroadland.gov.uk
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<https://www.southnorfolkandbroadland.gov.uk/data-protection/south-norfolk-council-data-protection>

<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

For Office use only: DD-040

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	Richard Doleman
Job Title (if applicable):	Principal Planner
Organisation / Company (if applicable):	Norfolk County Council
Address:	County Hall, Martineau Lane, Norwich
Postcode:	NR1 2SG
Tel No:	01603 223263
E-mail:	richard.doleman@norfolk.gov.uk

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

For Office use only:

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	DDDNP3
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input type="radio"/>	Oppose	<input checked="" type="radio"/>
Support with modifications	<input type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

The plan has not been updated to reflect the concerns of the Highway Authority and therefore we have a Highway Objection to the plan as a result of the inclusion of site DDDNP3.

The Neighbourhood Plan states that “access will need to be secured onto Chapel Street with adequate width for two-way traffic and maintaining the existing footway/cycleway”, but it isn’t clear this can be achieved and no evidence has been produced to show that suitable improvement can be achieved within highway or additional land has been secured to provide a safe access. The site is not likely to be deliverable and should be removed from the plan on the basis that it will be detrimental to highway safety.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

Allocation DDDNP3 should be removed from neighbourhood plan as the site is not likely to be deliverable and should be removed from the plan on the basis that it will be detrimental to highway safety.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

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Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed: R Doleman	Dated: 06/12/22
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Consultation Response Form

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- **Diss Library**, Church Street, Diss, IP22 4DD
- **Diss Town Hall**, 11-12 Market Hill, Diss, IP22 4JZ
- **Roydon - St. Remigius Church**, Roydon, Diss IP22 5RG
- **Scole Village Stores**, Assett House, The St, Scole, Diss IP21 4DR
- **Stuston - Place Farm Shop**, Place Farm, Old Bury Rd, Stuston, IP21 4AD
- **South Norfolk Council – The Octagon**, 40 Mere Street, Diss, Norfolk, IP22 2AH

HOW TO SUBMIT YOUR COMMENTS

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- **Complete Section Two**, identifying which paragraph / policy your comments relate to. You may comment on more than one part of the Plan but must make this clear. Use separate forms if necessary.
- **E-mail your comments to:** neighbourhoodplans@southnorfolkandbroadland.gov.uk
- **Post your comments to:** DDNP Consultation, c/o Place Shaping Team, South Norfolk Council, Thorpe Lodge, 1 Yarmouth Road, Thorpe St. Andrew, Norwich, NR7 0DU

It will not be possible to accept late representations

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<https://www.southnorfolkandbroadland.gov.uk/data-protection/south-norfolk-council-data-protection>

<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

For Office use only: DD-041

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	Steve Hickling
Job Title (if applicable):	Historic Environment Officer
Organisation / Company (if applicable):	Norfolk County Council
Address:	County Hall, Martineau Lane, Norwich
Postcode:	NR1 2SG
Tel No:	01362 869285
E-mail:	steve.hickling@norfolk.gov.uk

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

For Office use only:

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	6.1	Policy No.	
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input type="radio"/>	Oppose	<input type="radio"/>
Support with modifications	<input checked="" type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

The Norfolk County Council Historic Environment Strategy and Advice Team have suggested for the text below to be included in the neighbourhood plan.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

The following could be included: 'The Norfolk County Council Historic Environment Strategy and Advice Team will continue to offer high level advice on the impact of planning application on the historic environment and recommend appropriate planning condition wording when necessary.'

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

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I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed: S Hickling	Dated: 06/12/22
---------------------------	------------------------



Norfolk County Council

Norfolk County Council Comments on the: Diss and District Neighbourhood Plan (Reg 16) 16 December 2022

1. Preface

- 1.1. The officer-level comments below are made without prejudice.
- 1.2. The County Council welcomes the opportunity to comment on the emerging Neighbourhood Plan and recognises the considerable amount of work and effort which has been put into developing the Neighbourhood Plan to date.
- 1.3. The County Council supports the inclusion of policy 13.

2. Lead Local Flood Authority

- 2.1. The Lead Local Flood Authority (LLFA) welcome the following:
 - the majority of the LLFA's comments made at the first Reg 14 consultation stage have been acknowledged and included in the modifications to the Neighbourhood Plan.
 - the numerous references to flooding and drainage as a whole, with specific reference to surface water, groundwater and fluvial flood risk in Section 7.1 and Policy 7 of the Neighbourhood Plan.
 - the references to the LLFA and the inclusion of most of our recommended wording and requirements (outlined in our previous consultation response) within Section 7.1 and Policy 7 of the Neighbourhood Plan.
 - the numerous references to Sustainable Drainage Systems (SuDS) within the Plan and Policy 7.
- 2.2. The LLFA advise the following:
 - that Norfolk County Council (NCC), as the LLFA for Norfolk, publish completed flood investigation reports [here](#).
 - specific reference to our [Norfolk County Council \(NCC\) – Lead Local Flood Authority \(LLFA\) Statutory Consultee for Planning: Guidance Document](#) within the Neighbourhood Plan According to LLFA datasets (extending from 2011 to April 2022) the LLFA have 39 records of internal flooding and 33 records of external flooding in the area of the submitted Neighbourhood Plan that falls within the County of Norfolk. To specify this further, the LLFA report the following:
 - The Parish of Roydon: 2 records of internal flooding | 5 records of external flooding
 - The Parish of Diss: 12 records of internal flooding | 12 records of external flooding

- The Parish of Scole: 10 records of internal flooding | 7 records of external flooding
 - The Parish of Burston and Shimpling: 15 records of internal flooding | 9 records of external flooding
- if the records of internal and external flooding listed above are to be included in the Neighbourhood Plan, the wording should state these are extending from 2011 to the publishing date of the previous consultation response (April 2022) and not 'to present day' as currently stated in paragraph 230 of the Neighbourhood Plan.
- The LLFA note that all external flood events are deemed anecdotal and have not been subject to an investigation by the LLFA.
- The LLFA highlight the importance of considering surface water, groundwater and flooding from ordinary watercourses within the Neighbourhood Plan in the best interest of further development in the area.
- According to Environment Agency datasets, there are areas of surface water ponding and surface water flowpaths present within the Parishes of Roydon, Diss, Scole, and Burston and Shimpling. The LLFA note that, despite our previous comments at the Reg 14 and Reg 14 Major Modifications stages, there still appear to be no surface water flooding maps included within the submitted Neighbourhood Plan.
- The LLFA recommend inclusion of surface water flooding maps within the Neighbourhood Plan representative of the entire Neighbourhood Plan area. Information on this and associated tools/reference documents can be found at:
 - [GOV.UK - Long Term Flood Information – Online EA Surface Water Flood Map](#)
 - [Norfolk County Council \(NCC\) – Flood and Water Management Policies](#)
 - [Norfolk County Council \(NCC\) – Lead Local Flood Authority \(LLFA\) Statutory Consultee for Planning: Guidance Document](#)

2.3. Allocation of Sites

- 2.4. The LLFA would expect that the Neighbourhood Planning Process provide a robust assessment of the risk of flooding, from all sources, when allocating sites. If a risk of flooding is identified then a sequential test, and exception test where required, should be undertaken. This would be in line with Planning Practice Guidance to ensure that new development is steered to the lowest areas of flood risk. However, any allocated sites will also still be required to provide a flood risk assessment and / or drainage strategy through the development management planning process.
- 2.5. In the Major Modifications Reg 14 stage, the Neighbourhood Plan reduced the allocated sites for development from 19 to 13, reducing the total dwellings collectively from 494 to 446. This has now been increased to 16 allocated sites and 478 total dwellings.

- 2.6. All allocated sites except for 'DDNP11 - Land east of Norwich Road, Scole' have already been formally reviewed by the LLFA as part of the first pre-submission Reg 14 consultation for this Neighbourhood Plan (dated 17/08/2021). To avoid conflicting comments, the LLFA therefore have **no comments** to make on these allocated sites as part of this consultation at Reg 16 stage.
- 2.7. The LLFA has reviewed site DDNP11 - Land east of Norwich Road, Scole and determined that there is minor flood risk on the western edge of the site in the 3.33%, 1.0%, and 0.1% AEP events. Based on this and our previous review of the immediately adjacent site which is now DDNP10 - Flowerdew Meadow, Scole (at time of previous review this was known as DDNP08 - Land east of Norwich Road, Scole), the LLFA believe that local flood risk / surface water drainage constraints would not be severe enough to prevent development of this site, and that standard information would therefore be required at a planning stage.
- 2.8. Should you have any queries with the above comments please contact the Lead Local Flood Authority at llfa@norfolk.gov.uk.



Consultation Response Form

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<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

For Office use only: DD-043

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	Simon Hamilton
Job Title (if applicable):	Director
Organisation / Company (if applicable):	Active Norfolk
Address:	The Rural Support Centre, Easton College, Easton, Norwich
Postcode:	NR9 5DU
Tel No:	01603 228965
E-mail:	simon.hamilton@activenorfolk.org

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

For Office use only:

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	213, 265, 269, 276	Policy No.	10, 11
----------------------	--------------------	-------------------	--------

Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input type="radio"/>	Oppose	<input type="radio"/>
Support with modifications	<input checked="" type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

para 213 - Refers to Manual for Streets - which will be outdated by the time of publication - Manual for Streets 3 is due for publication imminently and has been developed by CIHT. The paragraph should also refer to Active Design and LTN1/20 (cycling infrastructure detailed guidance)

para 265 - The walking and cycling network goals within the plan are an important element of supporting peoples ability to be physically active. As Diss is well situated on the Norwich to London strategic rail link, this increases the propensity for multi modal active travel and active travel tourism.

para 276 - This reference is now out of date. Greater Norwich Growth Board commissioned a Physical Activity and Sport Strategy for South Norfolk, Broadland and Norwich which concluded with a new strategy adopted on 6 October 2022: <https://www.greaternorwichgrowth.org.uk/reports/pass/>. Additional improvements in attached word doc.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

para 213 - Sport England's Active Design guide is under review and the new guide (edition 3) will be released in March 2023. This is co-badged by Active Travel England and the Office for Health Inequalities and Disparity. Active Design 3 provides design guidance, best practice and case studies to ensure that places and spaces are designed in a way which promotes and enables physical activity for all ages, demographics and capabilities.

para 269 - It may be helpful to refer to Transport East's Active Travel Strategy, published Oct 2021. This highlights the 'Active Travel Pathway' for the whole region with progressive goals from 2030 to 2050. By 2030, half of all trips walked or cycled in town and cities. By 2050, half of all trips by walking and cycling.

This is a helpful strategy as it covers the whole east region and thus applies across the Norfolk, Suffolk boundary area of this plan

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input type="checkbox"/>

Signed: Simon Hamilton	Dated: 15 Dec 22
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15 December 2022

Continuation sheet of Consultation Response Form Diss & District Neighbourhood Plan 2021 – 2038

What improvements or modifications would you suggest?

Recommend that para 276 includes reference to **South Norfolk Built Facilities Strategy** dated 9/9/22. <https://www.greaternorwichgrowth.org.uk/dmsdocument/2883>

Para 4.85 of the strategy, 'Demand analysis suggests there is likely a need for a 4-court sports hall in Diss in the short to medium term. This could be developed on the Diss High School site, or it should be considered as part of any new leisure provision in the area. This would cater for the current unmet demand in the south of the district'

Para 5.86 also highlights a linked recommendation about swimming pool facilities. 'Demand analysis suggests there is likely a need for a 4-court sports hall in Diss in the short to medium term. This could be developed on the Diss High School site, or it should be considered as part of any new leisure provision in the area. This would cater for the current unmet demand in the south of the district'

Simon Hamilton

Director

Active Norfolk

Richard Squires
Senior Community Planning Officer
Broadland District Council & South Norfolk Council
Thorpe Lodge
1 Yarmouth Rd
Norwich
Norfolk

Safeguarding Department
Statutory & Offshore
Defence Infrastructure Organisation
St Georges House
DIO Head Office
DMS Whittington
Lichfield
Staffordshire
WS14 9PY
Tel: 07800 505824
E-mail: DIO-safeguarding-statutory@mod.gov.uk
www.mod.uk/DIO

16th December 2022

Your Ref: South Norfolk Council and Mid Suffolk District Council - Diss & District Neighbourhood Plan Regulation 16
DIO Ref: 10056756

Dear Richard,

It is understood that Broadland District Council & South Norfolk Council are undertaking a joint consultation regarding the Diss & District Neighbourhood Plan submission under Regulation 16, which sets out a vision for the neighbourhood area and planning policies which will be used to determine planning applications locally and guide development in the neighbourhood area.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.

Paragraph 97 of the National Planning Policy Framework 2021 requires that planning policies and decisions **should take into account defence requirements by** '*ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.*' **To this end MOD may be involved** in the planning system both as a statutory and non-statutory consultee. Statutory consultation occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued by Department for Levelling Up, Housing and Communities (DLUHC) in accordance with the provisions of that Direction.

The MOD have an interest within the area covered by the Diss & District Neighbourhood Plan, in a new technical asset known as the East 2 WAM Network, which contributes to aviation safety by feeding into the air traffic management system in the Eastern areas of England. There is the potential for development to impact on the operation and/or capability of this new technical asset which consists of nodes and connecting pathways, each of which have their own consultation criteria. Elements of this asset pass through the Diss & District Neighbourhood Plan area of interest.

The Safeguarding map associated with the East 2 WAM Network has been submitted to DLUHC for issue. As is typical, the map provides both the geographic extent of consultation zones and the criteria associated with them. Within the statutory consultation areas identified on the map are zones where the key concerns are the presence and height of development, and where introduction of sources of electro-magnetic fields (such as power lines or solar photo voltaic panels and their associated infrastructure) are of particular concern.

The review or drafting of planning policy provides an opportunity to better inform developers of the constraints that might be applied to development as a result of the requirement to ensure defence capability and operations are not adversely affected.

Copies of these plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above.

In addition, and where development falls outside designated safeguarding zones, the MOD may also have an interest, particularly where the development is of a type likely to have an impact on operational capability by virtue of scale, height, or physical properties. Examples of these types of development include renewable energy development such as the installation of wind turbine generators or solar photo voltaic panels, or any development that would exceed a height of 50m above ground level. Both tall (of or exceeding a height of 50m above ground level) structures and wind turbine development introduce physical obstacles to low flying aircraft. Solar PV development can compromise the operation of communications and other technical assets by introducing substantial areas of metal that degrade signals and, depending on the location of development, may produce glint and glare to the detriment of aviation safety. Wind turbines may impact on the operation of surveillance systems such as radar where the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations, potentially resulting in detriment to aviation safety and operational capability. This potential is recognised in the **Government's** online Planning Practice Guidance which contains, within the Renewable and Low Carbon Energy section, specific guidance that both developers and Local Planning Authorities should consult the MOD where a proposed turbine has a tip height of, or exceeding 11m, and/or has a rotor diameter of 2m or more.

In summary, the MOD have no concerns with the Diss & District Neighbourhood Plan but would wish to be consulted wherever the criteria associated with the East 2 WAM Network is triggered in order that appropriate assessments can be carried out and, where necessary, requests for required conditions or objections be communicated.

I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further

Yours sincerely

C Waldron

Chris Waldron

DIO Assistant Safeguarding Manager

12 December 2022

DDNP Consultation
c/o Place Shaping Team
South Norfolk Council
Thorpe Lodge
1 Yarmouth Road
Thorpe St Andrew
Norwich
NR7 0DU

SENT VIA EMAIL TO: neighbourhoodplans@southnorfolkandbroadland.gov.uk

Dear Sirs

**DISS AND DISTRICT NEIGHBOURHOOD PLAN 2021-2038 REGULATION 16 CONSULTATION
RESPONSE ON BEHALF OF PIGEON INVESTMENT MANAGEMENT LTD**

Thank you for consulting Pigeon Investment Management Ltd ('Pigeon') on the Regulation 16 Diss and District Neighbourhood Plan ('the DDNP'). We very much welcome the opportunity to participate in the current Regulation 16 consultation.

Pigeon is a privately owned company based in the Eastern Region, which specialises in high quality, landscape and design led sustainable development. We recognise the importance of community engagement and believe that sustainable, landscape and design led schemes are achieved in partnership with the local community. Our belief is that ongoing engagement significantly contributes to high quality design. This commitment has been commended by local communities and authorities that we have worked with in the past who have acknowledged the clear benefits of this approach. As such, we support Neighbourhood Planning and the role that it can play in delivering a long-lasting positive contribution for local communities.

Pigeon (in partnership with the Thelveton Estate) has previously made representations to both the Regulation 14 DDNP consultation and the emerging Greater Norwich Local Plan supporting the allocation of the following sites within Diss:

- Land west of Nelson Road and east of the Station Road, Diss (DDNP Site Allocation ref. DDNP04, GNLP ref.1045); and
- Land at Walcot Green Lane, Diss (GNLP ref. 1044).

The following comments are provided on behalf of Pigeon (in partnership with the Thelveton Estate) in the interests of future collaborative working between Pigeon, South Norfolk Council and the DDNP Steering Group and Diss Town Council and are intended to assist the Independent Examiner in their examination of the DDNP.

In the event that the Independent Examiner concludes that it is necessary to hold a public hearing then we wish to reserve the right to participate in the relevant hearing sessions so that we may expand upon the matters raised within our representation.

If in the meantime, it would assist either South Norfolk Council, Diss Town Council or the DDNP Steering Group to discuss the matters raised in this representation, then we would be happy to do so.

VISION AND AIMS

The DDNP sets out a Vision Statement to “*Maintain a vibrant community around a thriving market town*”, together with 10 aims to achieve this, covering 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 addressing local climate change issues.

Diss is located in the Waveney Valley on the Norfolk/Suffolk border within South Norfolk District. The town is connected by the A140, A1066 and regular rail services on the Norwich to London railway line. It has a wide selection of shops ranging from small local businesses to large superstores, providing services for both the town itself and the surrounding rural catchment.

As a main town within South Norfolk, providing services for both itself and the surrounding rural catchment, it is wholly appropriate that Diss is the main focus for new homes, jobs and infrastructure. We fully support the Vision Statement, which recognises Diss as the focus for the area, and the supporting aims.

In particular, we support Aim 1 (Sustainable Growth), which recognises the importance of meeting housing, employment and infrastructure needs by directing growth to the most sustainable locations, and Aim 3 (Growth and Infrastructure), which seeks to align growth with the required infrastructure and ensure future development will deliver the infrastructure that is required to support new homes and jobs.

Summary: Pigeon **support** the DDNP’s Vision Statement and Ten Aims.

DELIVERING GROWTH

The Regulation 19 Submission Greater Norwich Local Plan (‘the submission GNLP’) identifies a requirement for 400 new homes within Diss, part of which is proposed to be fulfilled by the allocation of 150 homes at the Frontier Agriculture site on Sandy Lane, leaving a residual requirement for 250 homes. The recent permission for 49 dwellings on the land south of Thatcher’s Needle reduces this requirement to 201 homes.

The requirement for 201 homes combined with existing commitments to be carried forward of 122 dwellings from the South Norfolk Local Plan, results in a total housing commitment for **323** dwellings in Diss (and part of Roydon village).

POLICY 1 – SCALE AND LOCATION OF HOUSING GROWTH

The DDNP seeks to accommodate the requirement for 323 dwellings through the allocation of the following sites within Diss, in addition to a number of sites that are ‘carry-forward allocations’ from the South Norfolk Site Specific Allocations and Policies Document.

Allocation Site & Policy No.	Location	New Homes
DDNP1	Land east of Shelfanger Road and west of Heywood Drive, Diss	180
DDNP2	Site of derelict Victorian Infant School, the Causeway, Diss	10
DDNP3	Site of the existing Leisure Centre, Victoria Road, Diss	20
DDNP4	Land west of Nelson Road and east of Station Road, Diss	25
DDNP5	Land north of Nelson Road, Diss	43
DDNP6	Land off Denmark Lane, Diss	25
DDNP7	Land north of Vince’s Road, Diss	10
DDNP15	Land off Park Road, Diss	10
DDNP16	The Feather Mills site, Park Road, Diss	12
Total	Diss	335

While Policy 1, plans for a slight over supply of +14 homes in Diss, it should be noted that the Frontier Agriculture site remains a draft allocation within the emerging Greater Norwich Local Plan (GNLP). The GNLP was submitted for examination in July 2021 and was the subject of an examination hearing session in February 2022. However, the plan has been delayed due to the requirement to consider the implications of Nutrient Neutrality on the River Wensum Special Area of Conservation and the Broads Special Area of Conservation and Ramsar site, that affects large parts of the Greater Norwich area, and the requirement to undertake a focussed consultation on potential Gypsy and Traveller sites. As a result, further hearing sessions are required that are anticipated to take place in Spring 2023 (in respect of Nutrient Neutrality and the impact that this will have on the GNLP housing trajectory) and July 2023 (in respect of Gypsy and Traveller sites). The implication of this delay is that the Inspectors’ Report of the GNLP Examination will not be published until Winter 2023, at the earliest.

Further, there remain outstanding objections to the allocation of the Frontier Agriculture site (GNLP ref. 0102) related to its availability (the site is currently in use as an employment site by the UK’s leading crop production and grain marketing business) and whether it is deliverable during the GNLP plan period. As such, there can be no certainty that the Frontier Agriculture site will be allocated, and that it will deliver 150 homes, or that it will come forward for development during DDNP plan period. The lack of certainty surrounding the delivery of the Frontier Agriculture site means that there is a realistic prospect of there being a 136 homes (150 homes minus the +14 homes over supply proposed within the DDNP) shortfall in Diss.

It is also unclear whether the GNLN will proceed with a spatial strategy that is reflective of the Regulation 19 submission GNLN, or whether significant changes will be required to make it sound. Indeed, there is no certainty that the plan will proceed to be adopted and that this will take place within the anticipated timetable (which is already significantly delayed due to the need to consider Nutrient Neutrality and Gypsy and Traveller site provision). Given the uncertainty surrounding the GNLN, we would suggest the inclusion of a review mechanism for the DDNP in the event that the GNLN does not proceed to adoption or the spatial strategy within the GNLN is required to be modified to the extent that this has a material impact upon the level of growth that is directed to Diss.

In addition, and as noted within the DDNP, the housing requirement provided by the Local Planning Authority is a minimum and the National Planning Policy Framework (NPPF) sets out an objective to significantly boost the supply of new homes. As such there is nothing that prevents the DDNP from allocating sites over and above this minimum requirement of 201 homes, which presents an opportunity to consider allocating additional sites.

In this regard, we propose the inclusion of Land at Walcot Green Lane, Diss (GNLN ref. 1044), that is being promoted by Pigeon (in partnership with the Thelveton Estate), as an allocation for a high quality scheme comprising around 120 new homes, including bungalows and affordable homes and around 10 self-build plots, together with extensive areas of green infrastructure and public open space, as a contingency site.

In the event that the Independent Examiner does not consider that there is a requirement to allocate Land at Walcot Green Lane as a contingency site, then we request that the DDNP include a criteria-based policy that allows for sites to come forward that are located adjacent to the settlement boundary and capable of providing sustainable development, provided such sites are in general accordance with the other policies within the DDNP.

Summary: Pigeon **support** Policy 1 but consider that **modifications** to the policy are required due to the lack of evidence surrounding the deliverability of the Frontier Agriculture site and the uncertainty surrounding the adoption of the GNLN. In order to ensure that the DDNP has regard to national policies contained within the NPPF and to ensure that the DDNP provides for the housing requirement set by the strategic policy making authority, we consider that modifications are required to the DDNP to allocate Land at Walcot Green Lane, Diss (GNLN ref. 1044) as a contingency site, or, in the event that the Independent Examiner does not consider that there is a requirement to allocate Land at Walcot Green Lane as a contingency site, that the DDNP include a criteria-based policy that allows for sites to come forward that are located adjacent to the settlement boundary and capable of providing sustainable development, provided such sites are in general accordance with the other policies within the DDNP. We also suggest that a review mechanism be included to allow for further delay or modification to the GNLN.

DDNP4: LAND WEST OF NELSON ROAD AND EAST OF STATION ROAD, DISS

Land west of Nelson Road and east of Station Road, Diss (approximately 0.94 ha) is identified as an allocation within the DDNP to accommodate approximately 25 homes. Pigeon have been selected by the Thelveton Estate for their expertise in bringing together teams of designers and specialist advisors to deliver high quality landscape and design-led sustainable schemes. The site can be

considered to be 'available' as defined by the NPPF and Pigeon generally support the proposed allocation of DDNP4 and look forward to working with South Norfolk Council, together with DDNP Steering Group and the Town Council to deliver a high-quality sustainable scheme on this site.

The draft policy for DDNP4 includes a number of matters that development of the site will be expected to address. These include requirements to:

- *Deliver walking and cycling links to Diss Railway Station; and*
- *Subject to agreement by Greater Anglia, deliver a road connection from Nelson Road to the railway station forecourt. This will also enable a one-way bus service to utilise the connection of Nelson Road and Station Road.*

While we support the aspiration to provide a link between Nelson Road and the Railway Station, Pigeon and the Thelveton Estate have been proactively engaging with Norfolk County Council to deliver such a route and have now agreed terms for the transfer of the small strip of land to the west of Nelson Road (i.e. between Nelson Road and the Station Forecourt) that is required to deliver this link. The transfer of this land to Norfolk County Council has been agreed on the basis that the County Council, as the Local Highways Authority, will undertake the necessary works to deliver the link to the station forecourt.

As such, and to ensure the achievement of sustainable development, criteria (a) and (b) of Policy DDNP4 should be deleted.

Summary: Pigeon **support** Policy DDNP4 but consider that **modifications** to the policy are required to ensure the achievement of sustainable development. Criteria (a) and (b) of Policy DDNP4 should be deleted.

POLICY 4: HOUSING MIX

We generally support Policy 2, which seeks to provide a mix of housing types and sizes to meet local housing needs. However, we note that the policy as worded requires major residential developments to include plots for self-build housing. The definition of major development set out within the NPPF is 10 or more homes, or sites with an area of 0.5 ha or more. Whilst we generally support the provision of self-build plots we do not consider that it is appropriate to impose a blanket requirement on all sites to include self-build plots. From our experience, people wish to build their own home within or close to their existing communities and to seek individual plots in either village or semi-rural (i.e. edge of settlement) locations. Therefore, we suggest that a more proactive approach is required to support self-build and custom-build homes, which will enable the identified need to be met in the right locations and for these types of homes to be located on the edge of settlements, subject to meeting reasonable criteria. Land at Walcot Green Lane includes such provision.

Summary: Pigeon **support** Policy 4 but consider that **modifications** to the policy are required to ensure the achievement of sustainable development. Criteria (g) should be replaced with a criteria based policy that enables sustainable sites on the edge of the settlement boundary to come forward for self-build and custom-build homes.

SUMMARY

In summary, the DDNP is a comprehensive and well written document, and the Steering Group should be commended for its work in producing the DDNP. While we support the allocation of Land west of Nelson Road and east of the Station (DDNP4), subject to the modifications sets out within this representation, we consider that there is a need to allocate Land at Walcot Green Lane, Diss (GNLP ref. 1044) as a contingency site, or, in the event that the Independent Examiner does not consider that there is a requirement to allocate Land at Walcot Green Lane as a contingency site, that the DDNP include a criteria-based policy that allows for sites to come forward that are located adjacent to the settlement boundary and are capable of providing sustainable development, provided such sites are in general accordance with the other policies within the DDNP.

We trust that the above will assist with the Independent Examiner in their assessment of the DDNP. In the event that the Independent Examiner concludes that it is necessary to hold a public hearing then we wish to reserve the right to participate in the relevant hearing sessions so that we may expand upon the matters raised above.

If in the meantime, it would assist either South Norfolk Council, Diss Town Council or the DDNP Steering Group to discuss the matters raised in this representation, then we would be happy to do so.

Yours faithfully



Rob Snowling MRTPI
Associate Director

Mobile: 07469 141802

Email: r.snowling@pigeon.co.uk



Consultation Response Form

Diss & District Neighbourhood Plan 2021 - 2038

Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

Diss Town Council have submitted a Neighbourhood Plan (the 'DDNP') to South Norfolk Council and Mid Suffolk District Council. The Plan, which covers the Town and several surrounding parishes sets out a vision for the area and contains policies which it intends will be used to help determine planning applications where relevant. The submitted plan etc. can be found online at:

- www.southnorfolkandbroadland.gov.uk/ddnp
- www.midsuffolk.gov.uk/DissandDistrictNP

Printed copies of the DDNP have also been deposited at the following locations, where they can be viewed on request during normal opening hours:

- **Brome & Oakley Village Hall**, The Street, Brome, IP23 8AE (Contact Parish Clerk to arrange viewing –07554 733621)
- **The Burston Crown**, Mill Rd, Burston, Diss IP22 5TW (Open 12:00-22:30 Wed-Sat)
- **Diss Library**, Church Street, Diss, IP22 4DD
- **Diss Town Hall**, 11-12 Market Hill, Diss, IP22 4JZ
- **Roydon - St. Remigius Church**, Roydon, Diss IP22 5RG
- **Scole Village Stores**, Assett House, The St, Scole, Diss IP21 4DR
- **Stuston - Place Farm Shop**, Place Farm, Old Bury Rd, Stuston, IP21 4AD
- **South Norfolk Council – The Octagon**, 40 Mere Street, Diss, Norfolk, IP22 2AH

HOW TO SUBMIT YOUR COMMENTS

All comments on this Plan must be submitted in writing and be received by no later than **4:00pm on Friday 16 December 2022**.

- **Complete Section One** in full so that your representation(s) can be considered at the Examination stage.
- **Complete Section Two**, identifying which paragraph / policy your comments relate to. You may comment on more than one part of the Plan but must make this clear. Use separate forms if necessary.
- **E-mail your comments to:** neighbourhoodplans@southnorfolkandbroadland.gov.uk
- **Post your comments to:** DDNP Consultation, c/o Place Shaping Team, South Norfolk Council, Thorpe Lodge, 1 Yarmouth Road, Thorpe St. Andrew, Norwich, NR7 0DU

It will not be possible to accept late representations

At the end of the consultation period, all comments received will be collated and then be forwarded on to the appointed Examiner. You should not assume that there will be further opportunities to introduce new information, although the Examiner may choose to seek clarity on certain matters.

Data Protection: All information collected and processed by South Norfolk Council and Mid Suffolk District Council at this stage is by virtue of our requirement under the N'hood Planning (General) Regulations 2012. All comments received will be made publicly available and may be identifiable by name / organisation. All other personal information will be protected in accordance with the Data Protection Act 2018. For more information on how we do this and your rights with regards to your personal information, and how to access it, please visit our websites or contact us at data.protection@southnorfolkandbroadland.gov.uk (SNC) or at customer.services@baberghmidsuffolk.gov.uk (MSDC).

<https://www.southnorfolkandbroadland.gov.uk/data-protection/south-norfolk-council-data-protection>

<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

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Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	HR Restoration Ltd
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	Bridge House, Denmark Hill, Palgrave, Diss, Norfolk
Postcode:	IP22 1AB
Tel No:	01379 640172
E-mail:	info@rackhams.org

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	Bidwells LLP
Address:	16 Upper King Street, Norwich
Postcode:	NR3 1HA
Tel No:	07966 202925
E-mail:	iain.hill@bidwells.co.uk

For Office use only:

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	DDNP2
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input type="radio"/>	Oppose	<input type="radio"/>
Support with modifications	<input checked="" type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

The allocation of the site is, in principle, supported, as is the inclusion of text within the policy that recognises that the retention of the former school building will be subject to evidence in relation to feasibility and viability.

The draft policy refers to "The former infant school, Mavery House" at paragraph 104. This is slightly ambiguous as the former school building and Mavery House are two separate properties and Mavery House is outside the boundary of the site allocation. The text should be amended to avoid any confusion.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

The text supporting policy 104 should be revised to remove reference to Mavery House.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

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Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

I reserve the right to appear prior to publication of the draft agendas that will set out the Examiners matters and questions to form the basis of the discussions at the Hearings. The intention to appear is to seek to ensure that the Policy / Plan satisfies the Basic Conditions and can be Made.

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed:



Dated: 16/12/22



Consultation Response Form

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Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

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- **Roydon - St. Remigius Church**, Roydon, Diss IP22 5RG
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<https://www.southnorfolkandbroadland.gov.uk/data-protection/south-norfolk-council-data-protection>
<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

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Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	G N Rackham & Sons Ltd
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	Bridge House, Denmark Hill, Palgrave, Diss, Norfolk
Postcode:	IP22 1AB
Tel No:	01379 640172
E-mail:	info@rackhams.org

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	Bidwells LLP
Address:	16 Upper King Street, Norwich
Postcode:	NR3 1HA
Tel No:	07966 202925
E-mail:	iain.hill@bidwells.co.uk

For Office use only:

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	DDNP6
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input type="radio"/>	Oppose	<input type="radio"/>
Support with modifications	<input checked="" type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

See attached.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

On this basis, on behalf of G N Rackham & Sons we object to the wording of Policy DDNP6 and suggest that rather than undermining the delivery of a site that is allocated in the South Norfolk Site Specific Allocations and Policies Document without the provision of evidence, the text is amended to require a landscape buffer of approximately 10m and consequently that approximately 42 units can be accommodated on the site.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Policy DDNP6**Please give details of your reasons for support / opposition, or make other comments here:**

Whilst the allocation is supported, it is considered that significant modifications are required to ensure that the policy satisfies the basic conditions.

Detailed representations were submitted at the Regulation 14 stage and from reviewing the DDNP Consultation Statement, it is not considered that the matters raised have been adequately addressed. Rather than the repeat the content of the Representations made at the Regulation 14 Stage, they are attached for ease of reference. However, in summary:

- Policy DIS 3 of the South Norfolk Site Specific Allocations and Policies Document (October 2015) allocates Land north off Denmark Lane, Diss for approximately 42 residential dwellings, and requires a 10m landscape belt.
- Draft Policy DDNP6 increases the landscape buffer from 10m to 20m, and reduces the quantum of development from approximately 42 homes to 25 homes.
- No evidence has been provided to justify why the increased buffer is required, and specifically why 20m, as opposed to 10m is considered necessary on land covered by DDNP06, rather than DDNP07. Indeed the draft policy states at paragraph 118 that *'the site is small enough not to threaten coalescence between Diss & Roydon, but it will be on the edge of the strategic gap identified within the DDNP. For this reason, and to protect the landscape value of the gap, a landscape buffer will be required along the western boundary of the site'*. Based on this, the draft policy proposes a landscape belt of approximately 20m. Conversely, Policy DDNP7 states that *'Development in this location will further erode the gap between the village of Roydon and the built-up area of Diss, which includes part of Roydon parish'*. However, the policy only identifies a landscape belt of approximately 10m being required.
- We are not aware of any material considerations to justify why the position in relation to the landscape buffer has changed since Policy DIS 3 of the South Norfolk Site Specific Allocations and Policies Document (October 2015) was adopted.
- The approach to landscape mitigation is an inconsistent and the flawed approach that is not justified by any evidence. It appears that it is an attempt to mitigate for the harm caused to the existing gap between Roydon and Diss as a result of DDNP07 being identified for development
- A planning application has been submitted for 47 units on the site (2022/1976) and is not considered by the Neighbourhood Plan.

As drafted, the wording of Policy DDNP6 is not considered to satisfy the basic conditions, in that it does not conform with the strategic policies of the Development Plan, or national policy (Para 119) in that it fails to ensure the efficient use of land. Interestingly, this is a concern raised by South Norfolk Council when considering the suitability of the policy at its meeting on 17th October, advising that "it is unclear they the policy has deemed it necessary to reduce the allocation from 42 homes to 25.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

I reserve the right to appear prior to publication of the draft agendas that will set out the Examiners matters and questions to form the basis of the discussions at the Hearings. The intention to appear is to seek to ensure that the Policy / Plan satisfies the Basic Conditions and can be Made.

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed:



Dated: 16/12/22



Consultation Response Form

Diss & District Neighbourhood Plan 2021 - 2038

Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

Diss Town Council have submitted a Neighbourhood Plan (the 'DDNP') to South Norfolk Council and Mid Suffolk District Council. The Plan, which covers the Town and several surrounding parishes sets out a vision for the area and contains policies which it intends will be used to help determine planning applications where relevant. The submitted plan etc. can be found online at:

- www.southnorfolkandbroadland.gov.uk/ddnp
- www.midsuffolk.gov.uk/DissandDistrictNP

Printed copies of the DDNP have also been deposited at the following locations, where they can be viewed on request during normal opening hours:

- **Brome & Oakley Village Hall**, The Street, Brome, IP23 8AE (Contact Parish Clerk to arrange viewing –07554 733621)
- **The Burston Crown**, Mill Rd, Burston, Diss IP22 5TW (Open 12:00-22:30 Wed-Sat)
- **Diss Library**, Church Street, Diss, IP22 4DD
- **Diss Town Hall**, 11-12 Market Hill, Diss, IP22 4JZ
- **Roydon - St. Remigius Church**, Roydon, Diss IP22 5RG
- **Scole Village Stores**, Assett House, The St, Scole, Diss IP21 4DR
- **Stuston - Place Farm Shop**, Place Farm, Old Bury Rd, Stuston, IP21 4AD
- **South Norfolk Council – The Octagon**, 40 Mere Street, Diss, Norfolk, IP22 2AH

HOW TO SUBMIT YOUR COMMENTS

All comments on this Plan must be submitted in writing and be received by no later than **4:00pm on Friday 16 December 2022**.

- **Complete Section One** in full so that your representation(s) can be considered at the Examination stage.
- **Complete Section Two**, identifying which paragraph / policy your comments relate to. You may comment on more than one part of the Plan but must make this clear. Use separate forms if necessary.
- **E-mail your comments to:** neighbourhoodplans@southnorfolkandbroadland.gov.uk
- **Post your comments to:** DDNP Consultation, c/o Place Shaping Team, South Norfolk Council, Thorpe Lodge, 1 Yarmouth Road, Thorpe St. Andrew, Norwich, NR7 0DU

It will not be possible to accept late representations

At the end of the consultation period, all comments received will be collated and then be forwarded on to the appointed Examiner. You should not assume that there will be further opportunities to introduce new information, although the Examiner may choose to seek clarity on certain matters.

Data Protection: All information collected and processed by South Norfolk Council and Mid Suffolk District Council at this stage is by virtue of our requirement under the N'hood Planning (General) Regulations 2012. All comments received will be made publicly available and may be identifiable by name / organisation. All other personal information will be protected in accordance with the Data Protection Act 2018. For more information on how we do this and your rights with regards to your personal information, and how to access it, please visit our websites or contact us at data.protection@southnorfolkandbroadland.gov.uk (SNC) or at customer.services@baberghmidsuffolk.gov.uk (MSDC).

<https://www.southnorfolkandbroadland.gov.uk/data-protection/south-norfolk-council-data-protection>

<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

For Office use only: DD-048

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	G N Rackham & Sons Ltd
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	Bridge House, Denmark Hill, Palgrave, Diss, Norfolk
Postcode:	IP22 1AB
Tel No:	01379 640172
E-mail:	info@rackhams.org

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	Bidwells LLP
Address:	16 Upper King Street, Norwich
Postcode:	NR3 1HA
Tel No:	07966 202925
E-mail:	iain.hill@bidwells.co.uk

For Office use only:

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	DDNP7
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input type="radio"/>	Oppose	<input type="radio"/>
Support with modifications	<input checked="" type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

See attached.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

On this basis, G N Rackham & Sons strongly object to the wording of Policy DDNP7 and request that the quantum of development is increased to 35 homes, as per Policy DIS1 of the South Norfolk Site Specific Allocations and Policies Document, so that it is reflective of robust technical evidence and that the delivery of the site is not unnecessarily compromised.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Policy DDNP7***Please give details of your reasons for support / opposition, or make other comments here:***

The reinstatement of the DIS1, as allocation DDNP7 is supported. However, whilst the allocation is supported, it is considered that significant modifications are required to ensure that policy satisfies the basic conditions.

Draft DDNP7 states that the site can accommodate approximately 10 homes. This is substantially less than the 35 homes the site is allocated for under Policy DIS 3 of the South Norfolk Site Specific Allocations and Policies Document (October 2015). The reduction in the quantum of development is based on the view that the south eastern part of the site is not appropriate to develop due to dense tree cover. However, no tree survey has been prepared as part of the Neighbourhood Plan evidence base to support this statement.

The Arboricultural Assessment prepared by fpcr and submitted in support of a planning application to develop the site to provide 39 units (2022/1344) identifies that the trees in question are of low value and that a significant number of the trees, including the highest value trees (Category B), would have to be lost to facilitate access to the site from Prince William Way. A copy of the Arboricultural Assessment is attached for ease of reference.

The significant reduction in the quantum of development, which is not based on robust evidence, is at odds with the Adopted Development Plan and the potential to undermine the viability and delivery of the site. Accordingly, as drafted, the wording of Policy DDNP7 is not considered to satisfy the basic conditions, in that it does not conform with the strategic policies of the Development Plan, or national policy (Para 119) in that it fails to ensure the efficient use of land.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

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I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

I reserve the right to appear prior to publication of the draft agendas that will set out the Examiners matters and questions to form the basis of the discussions at the Hearings. The intention to appear is to seek to ensure that the Policy / Plan satisfies the Basic Conditions and can be Made.

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed:



Dated: 16/12/22



Consultation Response Form

Diss & District Neighbourhood Plan 2021 - 2038

Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

Diss Town Council have submitted a Neighbourhood Plan (the 'DDNP') to South Norfolk Council and Mid Suffolk District Council. The Plan, which covers the Town and several surrounding parishes sets out a vision for the area and contains policies which it intends will be used to help determine planning applications where relevant. The submitted plan etc. can be found online at:

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- www.midsuffolk.gov.uk/DissandDistrictNP

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- **The Burston Crown**, Mill Rd, Burston, Diss IP22 5TW (Open 12:00-22:30 Wed-Sat)
- **Diss Library**, Church Street, Diss, IP22 4DD
- **Diss Town Hall**, 11-12 Market Hill, Diss, IP22 4JZ
- **Roydon - St. Remigius Church**, Roydon, Diss IP22 5RG
- **Scole Village Stores**, Assett House, The St, Scole, Diss IP21 4DR
- **Stuston - Place Farm Shop**, Place Farm, Old Bury Rd, Stuston, IP21 4AD
- **South Norfolk Council – The Octagon**, 40 Mere Street, Diss, Norfolk, IP22 2AH

HOW TO SUBMIT YOUR COMMENTS

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- **Complete Section One** in full so that your representation(s) can be considered at the Examination stage.
- **Complete Section Two**, identifying which paragraph / policy your comments relate to. You may comment on more than one part of the Plan but must make this clear. Use separate forms if necessary.
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- **Post your comments to:** DDNP Consultation, c/o Place Shaping Team, South Norfolk Council, Thorpe Lodge, 1 Yarmouth Road, Thorpe St. Andrew, Norwich, NR7 0DU

It will not be possible to accept late representations

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<https://www.southnorfolkandbroadland.gov.uk/data-protection/south-norfolk-council-data-protection>

<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

For Office use only: DD-049

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	G N Rackham & Sons Ltd
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	Bridge House, Denmark Hill, Palgrave, Diss, Norfolk
Postcode:	IP22 1AB
Tel No:	01379 640172
E-mail:	info@rackhams.org

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	Bidwells LLP
Address:	16 Upper King Street, Norwich
Postcode:	NR3 1HA
Tel No:	07966 202925
E-mail:	iain.hill@bidwells.co.uk

For Office use only:

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	DDNP8
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input type="radio"/>	Oppose	<input checked="" type="radio"/>
Support with modifications	<input type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

See attached.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

Based on the foregoing, G N Rackham & Sons request that the allocation of land south of Roydon Primary under Policy DDNP8 is deleted.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Policy DDNP8**Please give details of your reasons for support / opposition, or make other comments here:**

On behalf of G N Rackham & Sons Ltd, we continue to object to the proposed allocation of the site south of Roydon Primary School, Roydon (ref: DDNP8), which has been allocated for residential development. Detailed representations were submitted at the Regulation 14 stage and from reviewing the DDNP Consultation Statement, it is not considered that the matters raised have been adequately addressed. Rather than repeat the content of the Representations made at the Regulation 14 Stage, they are attached for ease of reference. However, in summary:

- The strategic gap between Diss and Roydon is reduced as a direct result of the allocation of the site south of Roydon Primary School, Roydon.
- It is disingenuous and somewhat perverse to introduce a policy that seeks to protect the Strategic Gap between Diss and Roydon whilst in parallel allocating a site that would reduce the Strategic Gap, when alternatives suitable sites (land south of High Road) are available.
- It is acknowledged in the Site Options and Assessment Report prepared by Aecom (dated December 2020) that development of this site would further reduce the gap between Roydon and Diss and lead to a threat of coalescence. In addition, paragraph 9.20 of the Strategic Environmental Assessment (SEA) for the Diss & District Neighbourhood Plan (June 2021) actually states “development in this location will contribute to the coalescence with Diss”.
- It is questionable as to how, in landscape terms, the site is considered more favourably than alternative options which will have no impact on the gap between Diss and Roydon. The impact on the landscape resulting from increased coalescence is, in our view, a significant environmental affect that has not be given adequate weight in the site selection process.
- There are multiple owners with an interest in the site, which raises questions in relation to deliverability. No evidence has been provided that issues relating to land ownership have been addressed.

Based on the foregoing, the proposed site allocation is not considered to satisfy the basic conditions, given that it is not in conformity with the strategic policies of the Adopted Development Plan. More specifically, the proposed allocation is contrary to Policy 2 of Joint Core Strategy for Broadland, Norwich and South Norfolk which requires that proposals respect local distinctiveness including “*the historic hierarchy of the city, towns and villages, maintaining important strategic gaps.*” Likewise, policy 2 of the emerging Greater Norwich Local Plan also requires that development proposals maintain strategic gaps.

Normally the Examiner will aim to consider the responses through written representations.

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Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

I reserve the right to appear prior to publication of the draft agendas that will set out the Examiners matters and questions to form the basis of the discussions at the Hearings. The intention to appear is to seek to ensure that the Policy / Plan satisfies the Basic Conditions and can be Made.

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed:



Dated: 16/12/22



Consultation Response Form

Diss & District Neighbourhood Plan 2021 - 2038

Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

Diss Town Council have submitted a Neighbourhood Plan (the 'DDNP') to South Norfolk Council and Mid Suffolk District Council. The Plan, which covers the Town and several surrounding parishes sets out a vision for the area and contains policies which it intends will be used to help determine planning applications where relevant. The submitted plan etc. can be found online at:

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- www.midsuffolk.gov.uk/DissandDistrictNP

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- **Diss Town Hall**, 11-12 Market Hill, Diss, IP22 4JZ
- **Roydon - St. Remigius Church**, Roydon, Diss IP22 5RG
- **Scole Village Stores**, Assett House, The St, Scole, Diss IP21 4DR
- **Stuston - Place Farm Shop**, Place Farm, Old Bury Rd, Stuston, IP21 4AD
- **South Norfolk Council – The Octagon**, 40 Mere Street, Diss, Norfolk, IP22 2AH

HOW TO SUBMIT YOUR COMMENTS

All comments on this Plan must be submitted in writing and be received by no later than **4:00pm on Friday 16 December 2022**.

- **Complete Section One** in full so that your representation(s) can be considered at the Examination stage.
- **Complete Section Two**, identifying which paragraph / policy your comments relate to. You may comment on more than one part of the Plan but must make this clear. Use separate forms if necessary.
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- **Post your comments to:** DDNP Consultation, c/o Place Shaping Team, South Norfolk Council, Thorpe Lodge, 1 Yarmouth Road, Thorpe St. Andrew, Norwich, NR7 0DU

It will not be possible to accept late representations

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<https://www.southnorfolkandbroadland.gov.uk/data-protection/south-norfolk-council-data-protection>
<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

For Office use only: DD-050

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	G N Rackham & Sons Ltd
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	Bridge House, Denmark Hill, Palgrave, Diss, Norfolk
Postcode:	IP22 1AB
Tel No:	01379640172
E-mail:	info@rackhams.org

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	Bidwells LLP
Address:	16 Upper King Street, Norwich
Postcode:	NR3 1HA
Tel No:	07966202925
E-mail:	iain.hill@bidwells.co.uk

For Office use only:

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	DDNP11
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input type="radio"/>	Oppose	<input checked="" type="radio"/>
Support with modifications	<input type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

See attached.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

Based on the foregoing, G N Rackham & Sons request that the allocation of land east of Norwich Road, Scole under Policy DDNP11 is deleted.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Policy DDNP11***Please give details of your reasons for support / opposition, or make other comments here:***

On behalf of G N Rackham & Sons Ltd, we object to the proposed allocation of land east of Norwich Road, Scole (ref DDNP11) which has been allocated for approximately 50 new homes.

Detailed Representations were submitted at the Regulation 14 stage, and from reviewing the DDNP Consultation Statement, it is considered that the matters raised have not been adequately addressed. Rather than repeat the content of the Representations made at the Regulation 14 Stage, they are attached for ease of reference.

However, in summary:

- Whilst land at Rose Farm, off Bungay Road (previously DDNP09 at Regulation 14 stage, and before that GNLP0338R) is no longer proposed to be allocated, an alternative site to the north of Scole – land east of Norwich Road (DDNP11) is allocated instead. This site (DDNP11) is situated at the northern end of the village, significantly further from the village centre than land south of Bungay Road (previously GNLP0527R).
- The consultation statement acknowledges that site GNLP0527R is the least constrained site within Scole, but argues that, “it is not necessary to allocate the site with fewest constraints if it doesn’t best fit with the growth strategy for the village”. However, it is not made clear in the Plan what the growth strategy for Scole is, or why it is focussed on extending the village further northwards into the countryside, rather than consolidating the nucleus of the village centre, when there is a clearly available option to do so.
- It is clear that site DDNP11 is affected by a number of potentially significant constraints such as noise, surface water flooding and heritage. Indeed, the supporting text states, “the site may be appropriate for allocation if certain issues can be resolved, or constraints mitigated” (emphasis added).

Based on the foregoing, the proposed site allocation is not considered to satisfy the basic conditions, given that it does not have regard to national policies (the NPPF) particularly in respect of avoiding development on land at risk of flooding, and is not the most sustainable location for development in the village.

Normally the Examiner will aim to consider the responses through written representations.

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I consider that a hearing should be held because ...

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(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed: 	Dated: 16/12/22
--	------------------------



Consultation Response Form

Diss & District Neighbourhood Plan 2021 - 2038

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HOW TO SUBMIT YOUR COMMENTS

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<https://www.midsuffolk.gov.uk/the-council/your-right-to-information/data-protection-act/>

For Office use only: DD-051

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent

Title / Name:	G N Rackham & Sons Ltd
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	Bridge House, Denmark Hill, Palgrave, Diss, Norfolk
Postcode:	IP22 1AB
Tel No:	01379 640172
E-mail:	info@rackhams.org

Part B: Agents – Please complete details of the client / company you represent

Client / Company Name:	Bidwells LLP
Address:	16 Upper King Street, Norwich
Postcode:	NR3 1HA
Tel No:	07966 202925
E-mail:	iain.hill@bidwells.co.uk

For Office use only:

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	NDHA18
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support	<input type="radio"/>	Oppose	<input checked="" type="radio"/>
Support with modifications	<input type="radio"/>	Have Comments	<input type="radio"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

See attached.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

Based on the foregoing, G N Rackham & Sons request the removal of Tower House as a Non Designated Heritage Asset (NDHA).

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Policy NDHA18***Please give details of your reasons for support / opposition, or make other comments here:***

On behalf of G N Rackham & Sons Ltd, we continue to object to the identification of Tower House as a Non Designated Heritage Asset (NDHA). Detailed representations were submitted at the Regulation 14 stage and from reviewing the DDNP Consultation Statement, it is not considered that the matters raised have been adequately addressed. Rather than the repeat the content of the Representations made at the Regulation 14 Stage, they are attached for ease of reference. However, in summary:

- No evidence is provided in the draft DDNP as to why the Tower House is considered to fulfil the identified NDHA criteria i.e. why is the Tower House considered to be of 'aesthetic interest', historic interest', 'design landscape interest' and 'social community value'.
- An independent Heritage Assessment has been undertaken against Historic England's Advice Note. The Heritage Assessment concludes that the Tower House has a lower level of heritage significance, found in its very limited, local level of historical association and landmark status, which is not enough to result in the building being a non-designated heritage asset when considered against national and Historic England guidance.
- It is therefore clear that the Tower House should not be a non-designated heritage asset and the designation should be deleted.

Based on the foregoing, the proposed NDHA is not considered to satisfy the basic conditions, given that it is not in conformity with national guidance.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

I reserve the right to appear prior to publication of the draft agendas that will set out the Examiners matters and questions to form the basis of the discussions at the Hearings. The intention to appear is to seek to ensure that the Policy / Plan satisfies the Basic Conditions and can be Made.

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the DDNP by South Norfolk Council and Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed:



Dated: 16/12/22

Our ref: DDNP R16 Response

Dated: 16 December 2022

Sent by e-mail:

For the attention of the DDNP Examiner,
c/o Place Shaping Team, South Norfolk Council
cc: *DDNP Working Group*

Dear Neighbourhood Plan Examiner,

- 1. Diss & District Neighbourhood Plan 2021 - 2038**
- 2. Reg 16 Submission Consultation – Response from Mid Suffolk District Council**

This response is made for and on behalf of Robert Hobbs (Corporate Manager for Strategic Planning at Babergh & Mid Suffolk District Councils).

Mid Suffolk District Council welcome the changes made to the Diss & District Neighbourhood Plan (the DDNP) in response to our previous comments. We also wish to thank the group for the opportunities had to explore other issues in more detail outside of the formal consultation process. The end result is a comprehensive Plan that seeks to address many locally important issues.

In our Regulation 14 Pre-submission response (August 2021) we made a number of recommendations based on the status and content at that time of our emerging Joint Local Plan (JLP). Following the conclusion of the JLP public hearing sessions in December 2021, and the agreement reached between the Inspectors and Babergh & Mid Suffolk District Council's to progress the JLP as a Part 1 and Part 2 document, we have found it necessary to revisit some of those recommendations.

In summary, the JLP's strategic policies relating to the settlement hierarchy, the spatial distribution of housing allocations, up-to-date settlement boundaries, and housing requirement figures for neighbourhood plan areas will all now be addressed in the Part 2 JLP. This is not expected to be adopted until 2025. This is reflected in some parts of the DDNP but not in a consistent way. In the appended table, we identify those supporting text paragraphs where we feel more context is needed and suggest alternate wording.

The appended table contains some other observations which we trust will be helpful. None seek significant changes to be made to the DDNP but do, for the record, capture minor inconsistencies so these can be addressed at the appropriate time.

Yours sincerely

Paul Bryant
Neighbourhood Planning Officer | Babergh & Mid Suffolk District Councils
T: 01449 724771 / 07860 829547
E: communityplanning@baberghmidsuffolk.gov.uk

Attached: Table of Comments

Diss and District Neighbourhood Plan 2021 – 2038

Reg 16 Submission response from Mid Suffolk District Council

DDNP ref	Comment
General comment	<p>In some cases, references to paragraphs in the NPPF still appear to be incorrect. We have noted the following, but there may be others:</p> <ul style="list-style-type: none"> • DDNP para 173: Should this refer to paragraph 62 of the NPPF? • DDNP para 199: Should this refer to paragraphs 124 - 125 of the NPPF? • DDNP para 262: Should this refer to paragraphs 110 and 111 of the NPPF? • DDNP para 345: Should this refer to paragraph 203 of the NPPF?
Para 40	For context, we suggest that the first sentence in para 41 be moved to the end of para 40.
Para 41	<p>Recommend that para 41 be re-worded as follows:</p> <p><i><u>The emerging Babergh & Mid Suffolk Joint Local Plan for 2018 to 2037 (JLP) had identified Brome, Palgrave and Stuston as Hinterland Villages. Oakley was identified as a Hamlet. Together, these villages were expected to deliver 64 homes over the Plan period. With the strategic policies in the JLP relating to the settlement hierarchy and housing requirement figures now deferred to Part 2 [expected to be adopted in 2025], this means that the housing requirement figure should be treated as 'indicative' only.</u></i></p>
Para 47	Delete "... and is identified as a Hinterland Village."
Para 50	Delete the first sentence.
Para 82	<p>Recommend that para 82 be re-worded as follows:</p> <p><i><u>The emerging Babergh & Mid Suffolk Joint Local Plan (JLP) set out a minimum housing requirement for the DDNP of 64 new homes within the parishes of Brome & Oakley, Palgrave and Stuston. Of those, a total of 49 already had planning permission at the JLP's base date (1 April 2018), which left a requirement for 15 to be allocated across the three parishes. For the purpose of this iteration of the DDNP, this figure is now recognised as being 'indicative' only.</u></i></p>
Section 6.7 DDNP13 DDNP14	<p>We welcome the helpful reference in para's 147 & 153 to the status of the JLP. We have no objection to the two housing site allocations made in policies DDNP13 and DDNP14, but do suggest it would be helpful to include a cross-reference within each policy to their respective allocation maps. If not done, we suggest the same approach apply to all the other housing allocation policies ... DDNP1 to 12, and DDNP 15 & 16.</p>
Policy 4	<p>We support our colleagues at South Norfolk Council in recommending that the number "64" be removed from the last sentence in criterion g).</p> <p>Nb: Without further explanation provided, we can only assume this is an erroneous reference to the overall housing requirement figure that was set out on page 44 of our Reg 19 JLP (Nov. 2020).</p>
Policy 8	The first paragraph should refer to Map 17
Policy 15	The first paragraph should refer to Maps 21 to 27.
Para 269	Please note that MSDC has a published 'Local Cycling and Walking Infrastructure Plan'. {See: https://www.midsuffolk.gov.uk/environment/sustainable-travel/ }

Ends

Date: 16 December 2022
Our ref: 411289



neighbourhoodplans@southnorfolkandbroadland.gov.uk

BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Richard Squires

Regulation 16 for the Diss & District Neighbourhood Plan - Statutory consultation

Thank you for your consultation on the above dated 02 November 2022

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours Choose salutation

Daniel Turner
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](#)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)².

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)³. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)⁴.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty (AONB)**, the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)⁵ website and also from the [LandIS website](#)⁶, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁷ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁸ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

¹ <http://magic.defra.gov.uk/>

² <http://www.nbn-nfbr.org.uk/nfbr.php>

³ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

⁴ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁵ <http://magic.defra.gov.uk/>

⁶ <http://www.landis.org.uk/index.cfm>

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NPPF_Feb_2019_revised.pdf

⁸ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁹), such as Sites of Special Scientific Interest or [Ancient woodland](#)¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹¹) or protected species. To help you do this, Natural England has produced advice [here](#)¹² to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 171. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)¹³.

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

⁹<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹⁰ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹¹<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹² <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹³ <http://publications.naturalengland.org.uk/publication/35012>

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#) ¹⁴).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

¹⁴ <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>