

22 March 2018

GNLP Regulation 18 Consultation Response

GNLP0427 – Land at Norwich Road, Acle

On behalf of our client, Mrs Jane Jones, we strongly recommend that Land at Norwich Road, Acle, should be allocated for commercial development. The site is considered to be entirely deliverable, and capable of supporting the employment aspirations for the district in the Plan period to 2036.

The site was submitted as part of the Call for Sites consultation in 2016. Subsequently, the site has received a preliminary suitability assessment within the Housing and Economic Land Availability Assessment (HELAA), released as part of the Regulation 18 consultation. This preliminary assessment highlighted a number of planning constraints on site, which this representation seeks to address in order to demonstrate the deliverability of the site.

In support of this representation, a Highways Assessment has been undertaken by Orari Transport Planning to demonstrate that safe and suitable access to serve a commercial development at the site can be achieved. The site can support a range of commercial uses, and the Highways Assessment demonstrates how specific roadside restaurant uses can be accommodated within the site.

In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', set out in footnote 11 to paragraph 47, the site represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of a commercial development being delivered on the site, and is viable.

These points are addressed in further detail below.

Assessment of Deliverability

Suitable

Acle is identified as a Key Service Centre within the JCS, as a location which can support some growth through a range of enhanced shops, services, community facilities and job opportunities. The Acle Neighbourhood Plan (2015) identifies the need for commercial space in Acle, as the existing areas of employment concentration (Damgate Lane Industrial Estate and the Village Centre) are at capacity, with few vacant units. The Neighbourhood Plan identifies that the lack of supply of new commercial space is stifling economic growth in the Town.

The site lies to the west of Acle, outside of the defined Settlement Limit. However, it is anticipated that the site would be suitable for commercial and roadside retail uses, potentially incorporating a roadside restaurant use, given its proximity to the A47, and siting in relation to the wider settlement. The site lies opposite to the allocated ACL1 site, so the principle of built form near the site is established. Furthermore, the site comprises a large area of vacant, brownfield land which is not suitable for agricultural uses. The allocation of this site would enable the regeneration of a large brownfield site in a sustainable location.

As mentioned previously, the site has received a preliminary assessment of its suitability for residential development in the HELAA. The summary below addresses the planning constraints identified for Land at Norwich Road as part of the HELAA assessment:

Access: **Amber** rated. The HELAA assessment raises concerns that the possibility of creating suitable access to the site is severely constrained. Currently, site access is achieved via a gated field access from the Norwich Road small roundabout. This field access provides pedestrian and vehicular access, via a concrete roadway of circa 3.5m width to the pumping station within the site curtilage. Trip generation on site currently is deemed to be negligible.

To address these concerns raised in the HELAA around access, Orari Transport Planning were instructed to undertake a high-level access appraisal of the site. Their report, submitted in support of this representation, demonstrates that a suitable access to the site can be achieved.

Access to the site can be achieved from Reedham Road. To achieve this, some local road widening of Reedham Road is likely to be required. This will provide a right turning lane to enable southbound Reedham Road drivers to wait, to turn right into the site, without obstructing northbound Reedham Road vehicles. More information is available within the Highways Assessment submitted in support of this representation.

From this, it is apparent that the site can be accessed from Reedham Road, following some local road widening. These enhancements can be provided as part of any development proposals for the site. The site should therefore receive a **Green** rating for access.

Accessibility to Services: **Green** rated. While the site is beyond the Settlement Limit, it is well related to the existing settlement, and benefits from road and footpath linkages into the Town and the wider region.

Utilities Capacity: **Green** rated. It is anticipated that local utilities services can accommodate commercial uses on site.

Utilities Infrastructure: **Amber** rated. The site contains a sewage pumping station, which could be retained as part of any development. Any planning application for development at the site would be supported by a utilities assessment, to ascertain whether enhancements to utilities infrastructure are required to facilitate development.

Contamination and Ground Stability: **Amber** rated. As a brownfield site, there is a risk of contamination on site. The pumping station on site may carry a contamination risk, which would be assessed in detail at the planning application stage. Furthermore, the site was used by May Gurney as an office/store base when the Acle Bypass was being constructed. The laying of concrete bases during this time has eroded the quality of the soil on site, rendering it unsuitable for agricultural uses. The site would be subject to a detailed contamination assessment as part of any planning application. The site is stable, with a southerly incline, which is not anticipated to inhibit the development potential of the site.

From this, it is apparent that there are no issues relating to Contamination/Ground Stability which would preclude development at Land at Norwich Road, so the site should receive a **Green** rating.

Flood Risk: **Green** rated. The site falls within Flood Zone 1. The HELAA assessment for the site notes that part of the site is at risk of surface water flooding. The Environment Agency's flood mapping tool indicates that a small portion of the site is at low risk of surface water flooding. This can be factored into any development proposals.

Biodiversity and Geodiversity: **Green** rated. The site has a low ecological value.

Historic Environment: **Green** rated. The site is not situated within the vicinity of any listed structures or monuments.

Open Space and GI: **Green** rated. The development of the site would not result in the loss of any public open space or significant green infrastructure.

Market Attractiveness: **Red** rated. The site benefits from a high level of passing trade, and is well connected to the local highway network. Therefore, it is felt that the site in fact holds a particularly desirable location for a commercial use, given the prevalence of passing trade.

From this, it is apparent that there are no issues relating to Market Attractiveness at Land at Norwich Road, so the site should receive a **Green** rating.

Significant Landscapes and Townscapes: **Amber** rated. The site is not subject to any specific landscape designations. The site contains a row of existing trees and vegetation on both the southern and eastern boundaries. To the north of the site is Norwich Road, and on the opposite side of Norwich Road is a row of trees and vegetation. Therefore, the site is relatively well screened from the surrounding context; with limited views of the site available from the surrounding countryside. As a result, development on the site will have a negligible impact upon the townscape of the area.

From this, it is apparent that there are no issues relating to Significant Landscapes/Townscapes at Land at Norwich Road, so the site should receive a **Green** rating.

Transport and Roads: **Red** rated. The HELAA assessment deems the local road network to be unsuitable in terms of road capacity/lack of footpath provision. The north of the site is bordered by the southern frontage of the A47 slip road, that connects the A47 eastbound carriageway with the Norwich Road small roundabout junction. To the south lies the eastbound carriageway of the A47 Norwich, while the western frontage of the Reedham Road public highway, between the Norwich Road small roundabout and Station Road, lies to the east of the site.

Orari Transport Planning's highways assessment utilised the TRICS database relating to 'road-side food' facilities, which utilises data collated from surveys at several 'Little Chef' restaurants. This was considered appropriate for the evaluation of a similar scale commercial facility on site. This TRICS trip generation data suggests that the site would generate around 14 vehicle trips during the AM peak period, circa 19 vehicle trips during the PM peak period, and a total of circa 267 vehicle trips per 12-hour day.

This is likely to engender 1 additional vehicle egressing the site every 10 minutes during the AM peak, and circa. 1 additional vehicle egressing the site every 6 minutes during the PM peak. It is considered that such additional vehicle movements are unlikely to have any measurable impact upon traffic flows on Reedham Road or on the adjacent A47 slip road / Norwich Road small roundabout, or the local Acle highway network during the AM and PM peak periods.

Furthermore, it is anticipated that parking on site can be provided in line with Norfolk County Council's current parking guidelines for restaurants/cafes (1no. parking space/5 sqm GFA). Development on site would also refrain from erecting any prominent advertising hoardings/bright lights that could distract drivers on the A47 or A47 slip road.

Finally, existing footpaths run from the site entrance, with a crossing point over to Norwich Road, which provides a footpath network into the centre of Acle. Therefore, it can be demonstrated that the site is well connected for pedestrians.

From this, it has been demonstrated that the local transport network would be able to accommodate the proposed development, with access off Reedham Road. Therefore, the site should receive a **Green** rating.

Compatibility with Neighbouring Uses: **Amber** rated. Commercial uses on site would represent a departure from the character of the surrounding area. The location of the site on the western fringe of Acle ensures that roadside commercial uses would be compatible with the neighbouring highway uses, enabling a commercial facility that would benefit from passing trade from the A47.

From this, it is apparent that there are no issues relating to Compatibility with Existing Uses at Land at Norwich Road, so the site should receive a **Green** rating.

The Site Proposals document, released with the Reg 18 consultation, identifies that the site is particularly constrained due to noise issues from the A47. It is not anticipated that commercial uses on site would be adversely impacted by noise from the surrounding highways network. Any planning application for the site could be informed by appropriate noise surveys.

Additionally, the soil quality on site is of poor quality, and part of the site has been used as a grass mix cover for some years, following the use of the site during the construction of the Acle Bypass. The site is therefore not viable for agricultural uses. The development of this site would regenerate vacant brownfield land by providing commercial development that is urgently required in Acle, as demonstrated within the Acle Neighbourhood Plan.

From this, it is apparent that there are no planning constraints that would render the site unsuitable for commercial development, to comprise a potential roadside restaurant/café use.

Available

The site is within the ownership of Mrs Jane Jones, who has instructed Bidwells to submit this representation on her behalf. The site is not restricted by any leases or restrictive covenants. Therefore, the site is available for development.

Achievable

Based on the suitability assessment above, it is demonstrated that there are no site-specific constraints which could restrict commercial development on the site. Therefore, commercial development on the site is deemed to be entirely achievable, and an appropriate means of regenerating vacant brownfield land.

Viable

Development of the site for commercial purposes is considered viable, taking into consideration the various policy requirements in relation to matters such as CIL contributions. Further evidence on viability can be provided on a strictly private and confidential basis, should this be deemed necessary at the appropriate time in the planning process.

Summary

As outlined above, the site is suitable, available, achievable and viable, and is therefore developable. The site is in a highly accessible and sustainable location; and would provide a strategic extension to Acle for commercial uses. This would help to overcome the lack of commercial space in Acle, as identified in the Acle Neighbourhood Plan, and would encourage inward investment and jobs into Acle.

It has been demonstrated that there are no planning constraints on site that could not be addressed through appropriate mitigation, and suitable access can be achieved from Reedham Road. Commercial development in this location will offer appropriate and proportionate growth in a highly sustainable location, and enable the regeneration of an important brownfield site.

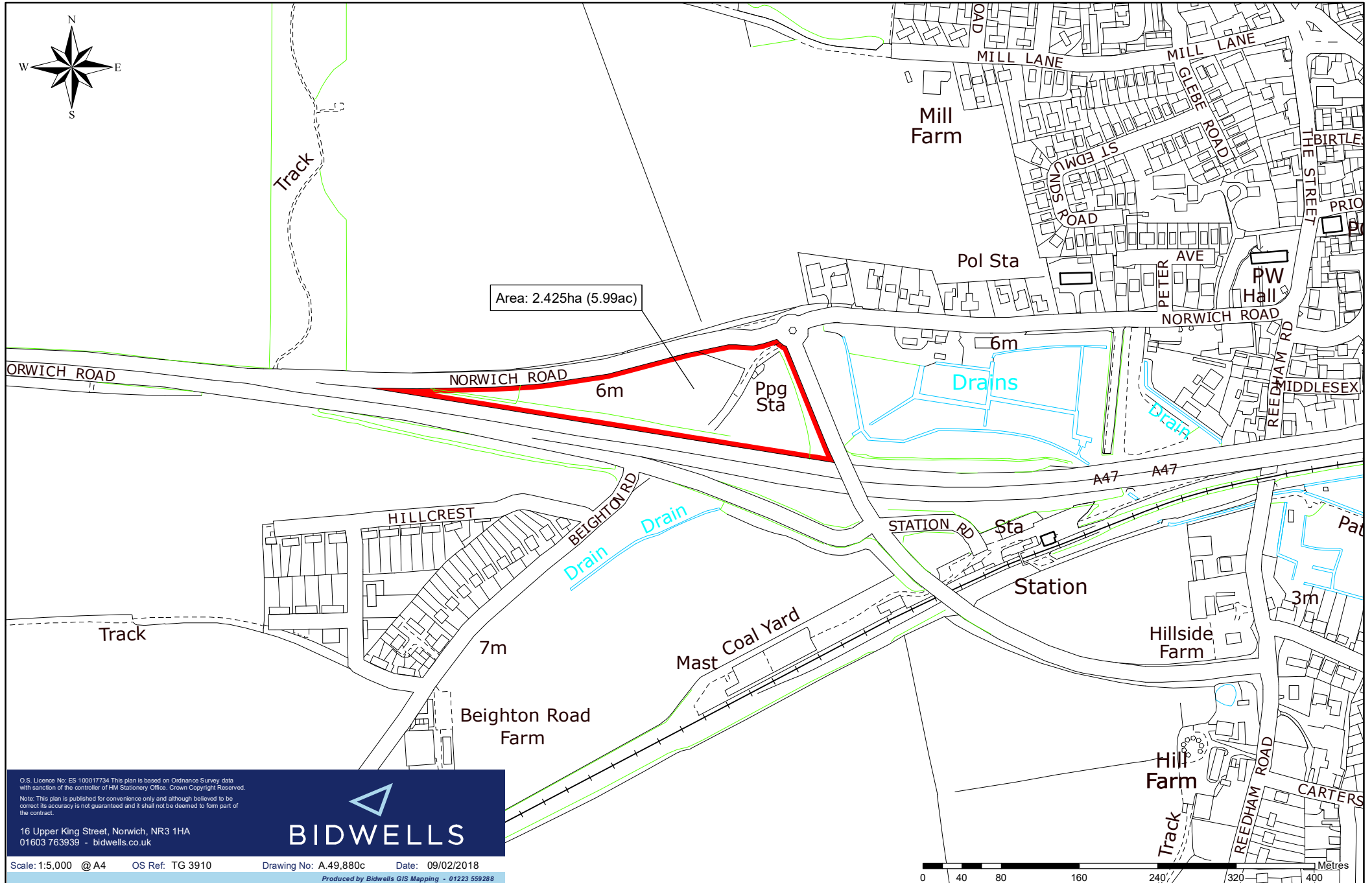
On this basis, the site should be taken forward as an allocation for commercial development in the emerging Local Plan, and would represent sustainable development.

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Land at Norwich Road, Acle



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