

GNLP Regulation 18 B Consultation Response

Site:	Land East of Ipswich Road, Caistor St Edmund	Reference:	GNLP2158
Client:	Mr David Smith, Mr Dennis Smith, Mrs Annabel Taylor	Date:	December 2018

1.0 Introduction

- 1.1 On behalf of our client and the landowners, Mr David Smith, Mr Dennis Smith and Mrs Annabel Taylor, we wish to support the site East of Ipswich Road for allocation for a mixed-use commercial development. Our client considers the site to be deliverable and would make a valuable contribution to the employment land requirements within the Plan period.
- 1.2 This representation is submitted as part of the Greater Norwich Local Plan Regulation 18 B Consultation in support of the site referenced as GNLP2158, which was originally submitted during the initial Regulation 18 consultation. This representation aims to provide further detail relating to the site opportunities and responds to the HELAA Addendum 2018 via site specific assessment.

2.0 Site Opportunities

- 2.1 The site is promoted for a mixed-use commercial development. This site, equating to approximately 50 hectares in size, creates an excellent opportunity to provide land for new employment opportunities in a sustainable location within the Norwich Policy Area.
- 2.2 An Indicative Masterplan accompanies this representation which identifies how the site could be delivered, with a range of flexible uses identified. As an indication of potential land uses, the site is capable of accommodating the following mix of development:

Type of Development	Potential Floorspace (m2)	Potential No. of Jobs Created ¹
Use Class B1	31,100	2,592
Use Class B2	17,200	478
Use Class B8	19,300	251
Use Class A1-A5 and Sui-Generis	9,300	465
Total	76,900	3,786

- 2.3 Whilst the site is approximately 50 hectares, the developable area is expected to be reduced significantly in order to provide landscaping, strategic landscaping buffer zones, green space and

¹ The potential number of jobs created is calculated using the Homes and Communities Agency Employment Densities Guide: 3rd Edition (December 2015), which is the recognised industry-wide point of reference for projected job creation.

exclusion zones from existing constraints such as high priority woodland areas, flood risk zones and the Depot Meadow County Wildlife Site. As a result, the delivery of this site provides an opportunity to enhance these features.

- 2.4 The benefit of the size of the site provides increased flexibility in the potential uses and operators that could occupy the site. This would in turn increase choice and competition in this region of the Norwich Policy Area.
- 2.5 It is expected that development of the site would require removal of the majority of the existing farm buildings. However, there remains an opportunity for the Harford Farm farmhouse to be retained and potentially used as a farm shop.
- 2.6 The majority of potential retail floorspace on the site is expected to be located adjacent to the primary site entrance and adjacent to the existing Tesco superstore on the northern boundary of the site. This provides a logical extension to the retail uses in the locality.
- 2.7 The sui-generis uses are expected to comprise operations such as car sales showrooms, for which potential operators have shown interest.
- 2.8 The site is currently accessed via an adopted road from the A140 Ipswich Road known as Markshall Farm Road. The site can remain to be accessed from this location as a primary access with some improvement works. Notwithstanding this, it is expected that delivery of this site would also provide public benefit through the introduction of off-site improvements to the A140 in order to improve traffic flow and congestion along this route.
- 2.9 The land is also currently accessed for agricultural purposes from a gate adjacent to the entrance to Tesco at the north western corner of the site. It is possible that this could remain a secondary access and assist in potentially separating uses such as retail and traditional employment uses more succinctly.
- 2.10 The site is located in a sustainable location with excellent public transport links including, most notably, the Harford Park and Ride which is located on the opposite side of the A140. This means that the site is accessible for a range of people from both the rural and urban areas using sustainable transport methods.
- 2.11 Due to the site's convenient location adjacent to a main intersection on the outer ring road, the site would be easily serviced by delivery vehicles and easily accessed by employees. This unique location provides opportunities for a range of potential commercial uses.

3.0 Site Assessment

- 3.1 The site has been assessed as part of the HELAA Addendum 2018. For the purposes of the HELAA capacity assessment, the site is concluded as being suitable for development.

3.2 As part of the suitability assessment, constraints and impacts analysis were carried out with a traffic light assessment corresponding to individual material consideration. The site received a 'Green' response in respect of the following matters:

- Utilities Infrastructure;
- Contamination and Ground Stability;
- Townscapes;
- Historic Environment;
- Transport and Roads; and
- Compatibility with Neighbouring Uses.

3.3 Accordingly, the above matters are not considered in as part of this submission.

3.4 A further seven matters were considered 'Amber' and one matter was considered 'Red'. These matters are assessed in further detail below.

Access

3.5 The site is currently accessed via the adoptable road Markshall Farm Road which runs east-west through the site from the A140 and terminates within the site. The site is also accessed by secondary means via the road from the A140 leading to Tesco.

3.6 The proposed development would provide opportunity to enhance the existing adopted road making it suitable for the intended uses.

3.7 Depending on the final mix of development, the expected number of vehicular movements would dictate the required improvements to the intersection of Markshall Farm Road and the A140. An allocation therefore has the potential to provide public benefit in the form of improved connections on the A140.

Accessibility to Services

3.8 The site lies within close proximity to Norwich and a range of local and district centres, providing services for future employees. Furthermore, the site is served by public transport by virtue of the Harford Park and Ride located adjacent to the site on the A140.

3.9 Adjacent to the site is a Tesco superstore and the proposed development of the site would seek to enhance the retail services provided in this location. Accordingly, a future allocation would make the

site itself self-sufficient in respect of providing local services and ensuring the development on the site remains sustainable.

Utilities Capacity

- 3.10 The neighbouring uses are well connected to utilities services. There is no evidence to suggest that there are any current issues with utilities capacity locally. Nonetheless, this would be assessed in detail at a more detailed design stage.

Flood Risk

- 3.11 Land along the northern boundary of the site is identified by the Environment Agency as falling within Flood Risk Zones 2 and 3. However, there is ample space available within the site that allows this area to be entirely isolated from development. The Indicative Masterplan that accompanies this representation identifies the areas at the highest risk of flooding from the River Yare. There is therefore sufficient space within the development site to mitigate any risk from flooding from rivers.
- 3.12 The Environment Agency also identifies an area of potential surface water flooding in the western section of the site adjacent to the A140. The Indicative Masterplan highlights how this area is likely to be free from development and incorporate a green space buffer.
- 3.13 In addition, there is a small area of surface water flood risk along Markshall Farm Road. It is expected that improvements to this adopted road through widening and resurfacing would include sufficient drainage design in order to mitigate surface water flooding in this area.

Market Attractiveness

- 3.14 Despite the apparent conclusion within the Greater Norwich: Employment, Town Centres and Retail Study (2017) that the overall need for employment land is less than currently allocated or permitted, assessment of market demand suggests that the existing allocations and permissions are not fully meeting market demand. Notwithstanding this, the Greater Norwich Local Plan Regulation 18 Consultation document acknowledges that whilst there is no need for additional land, new allocations should be made to target specific sectors and to provide larger site allocations.
- 3.15 Recent trends in Norwich and the surrounding areas suggests that there is a clear demand for units in the B1, B2 and B8 use classes. Market indicators in this area further suggest that there is an increasing need for larger standalone units.
- 3.16 The Indicative Masterplan presents a mix of uses that could be interchanged flexibly in response to market demand across the Plan period. The Masterplan also demonstrates how larger units can be accommodated within the site in order to meet the short-term and medium-term demand that has been demonstrated in recent planning applications on adjacent sites.

- 3.17 The landowners have been approached by potential operators for the proposed uses across the site, which further demonstrates that the site is an attractive prospect for the market. Approaches have been made in private, however, further details of such enquiries may be divulged in confidence with the GNLP Team if required to support this matter.

Significant Landscapes

- 3.18 The site currently comprises an arable field with farm buildings of various sizes and a woodland area in the east.
- 3.19 The wider landscape also consists of arable fields, as well as small parcels of woodland, highway infrastructure, overhead power lines and pylons. In addition, some further built development is evident, for example at the Tesco supermarket.
- 3.20 The site is located within the Norwich Southern Bypass Landscape Protection Zone, which is designated because of visibility from the road towards an area of open rural character. The site is also undulating in nature some sections are more visible than others at present.
- 3.21 Development of this site will introduce further built forms that will produce an inevitable change to the open farmland character of the site. The visual effects as a result of the development would include changes to the skyline. These effects can be mitigated through the introduction of green buffer areas along the key transport routes of the A140 and A47, as well management of building density and heights in consideration of the most visually prominent locations.
- 3.22 Delivery of the site is expected to incorporate a layout that provides landscape buffers throughout the development in order to break up built form and provide screening from longer ranging views. In doing so, future proposals would be required to provide landscape enhancement mitigation in accordance with Policy DM 4.6 of the adopted South Norfolk Development Management Policies Document 2015 which seeks to protect the landscape setting of Norwich.
- 3.23 The site is considered to be large enough to incorporate such significant landscape mitigation and the Indicative Masterplan provides an indication of how this could be achieved.
- 3.24 Whilst the visual change following development if this site would be significant, this does not in itself result in the landscape and visual effects being unacceptable providing appropriate mitigation is secured. These features could be secured through an appropriately worded allocation.

Biodiversity and Geodiversity

- 3.25 At present, the site comprises agricultural land. The Depot Meadow County Wildlife Site is located within the site. However, due to the size of the site, an appropriate development can be achieved through avoidance of this area entirely.

- 3.26 Indeed, proposed development in this location, as indicated on the Indicative Masterplan, would seek to further protect this area and provide additional landscaping and habitat space surrounding the County Wildlife Site as a buffer to development. This has the potential to provide ecological enhancements.
- 3.27 The Chapel Hill woodland area is located to the west of the site and would remain as part of any future development. The High Spatial Priority Woodland area around this location is avoided as far as possible to protect existing habitats in this location within the Indicative Masterplan. The extent by which development could be located within or adjacent to the Priority area would be determined as part of a future Ecological Assessment.

Open Space and Green Infrastructure

- 3.28 The site does not currently incorporate any publicly accessible open space or formal green infrastructure.
- 3.29 As demonstrated on the Indicative Masterplan, development of this site provides an opportunity to create attractive open spaces for employees, as well as green infrastructure corridors around the site. Notably, a green buffer is expected along the A47 in order to enhance this corridor. The existing tree belt along the A140 at the southern section of the site is expected to remain, and a green buffer in the northern section of the site would also be retained and enhanced.
- 3.30 The Indicative Masterplan has therefore considered how development could be situated in the context whilst also securing public benefit through the introduction of new green infrastructure to deliver a wide range of environmental enhancements to the site.

4.0 Deliverability

- 4.1 Whilst the definition of being 'deliverable' is well defined in Annex 2 of the National Planning Policy Framework (2018) in the context of sites for housing, no such formal definition is afforded to non-residential development. Nonetheless, it is considered that the same tests of suitability, availability and achievability can logically be applied to establish whether sites for non-residential development may be defined as 'deliverable'. The site is assessed against these tests.

Suitable

- 4.2 As outlined in the Site Assessment above and the HELAA Addendum 2018, the site is considered suitable for the nature of the proposed development.

Available

- 4.3 The site outlined in this representation is owned entirely by Mr David Smith, Mr Dennis Smith and Mrs Annabel Taylor. The majority of the site is registered under a single Title. All landowners support this representation to make the land available for the stipulated uses within the Plan period.
- 4.4 There are no known legal constraints in respect of the land that would restrict future development for these purposes.

Achievable

- 4.5 In order to be achievable, there must be a realistic prospect that development will be delivered on the site. As already established, there are no physical, legal or planning constraints that would prevent development of this site. The landowners have a clear desire, by preparing this representation and undertaking initial site assessments, to ensure that the site potential is achieved.
- 4.6 As explained above, the site is available for development and it is capable of being delivered within 5 years.
- 4.7 Furthermore, the landowners have been approached by potential commercial operators representing the proposed uses. This shows clear intent on the prospect of this site being delivered.

5.0 Conclusion

- 5.1 Through the production of the Greater Norwich Local Plan, the Council's of Norwich, South Norfolk and Broadland are seeking to create around 45,000 job in the area over the Plan period of 2015-2036. This site presents an opportunity to create a key strategic employment site providing circa 3,800 jobs in a highly sustainable and accessible location within the Norwich Policy Area.
- 5.2 The site is well related to the existing adjacent employment and retail uses, and the Indicative Masterplan demonstrates how these uses could be developed harmoniously to create a key strategic employment site.
- 5.3 The site is located in a unique position at the intersection of the A140 and A47 and adjacent to a Park and Ride facility. The location of the site and its existing sustainable transport connections is beneficial in being able to offer employment opportunities for people distributed across the urban and rural areas.
- 5.4 There are no material planning considerations that would restrict the development of this site for the proposed uses and this is demonstrated through the Site Assessment contained in Section 3 and the HELAA Addendum 2018.
- 5.5 Market indicators suggest that this is desirable by virtue of its size, location and proximity to complimentary uses. Accordingly, enquiries regarding land availability have been received by the

landowners. The Indicative Masterplan has been prepared to provide an overview as to how the potentially identified uses could be accommodated on the site. This market interest demonstrates that there is a clear need for development of this type in this location, and therefore there is an undoubtable desire to see this site developed in the short to medium term.

- 5.6 In conclusion, the site is suitable, available and achievable both within the Plan period and indeed within the next 5 years. Accordingly, the standard tests of deliverability as set out in the NPPF are met and the site should be considered appropriate for allocation within the Greater Norwich Local Plan.