Special Meeting of the Development Management Committee

Members of the Development Management Committee:

<table>
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<tr>
<th>Conservatives</th>
<th>Liberal Democrats</th>
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<tr>
<td>Mr J Mooney</td>
<td>Mr T East</td>
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<tr>
<td>(Chairman)</td>
<td>Dr M Gray</td>
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<td>Mr D Blake</td>
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<td>(Vice-Chairman)</td>
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<td>Mr C Foulger</td>
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<td>(Vice Chairman)</td>
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<td>Mrs F Ellis</td>
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<td>Mr C Gould</td>
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<td>Dr C Kemp</td>
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<td>Mr L Hornby</td>
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<td>Mrs L Neal</td>
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<td>Mr T Palmer</td>
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Pool of Substitutes

Leslie Dale
Nigel Legg
Brian Riches

Pre-Committee Members’ Question Time

12.00pm – 12.30pm Blomefield Room

Date
Tuesday 20 November 2012
(please note change of day)

Time
1.00 pm

Place
Council Chamber
South Norfolk House
Swan Lane
Long Stratton Norwich
NR15 2XE

Contact
Caroline Heasley   tel (01508) 533685
South Norfolk District Council
Swan Lane
Long Stratton Norwich
NR15 2XE

Email: democracy@s-norfolk.gov.uk
Website: www.south-norfolk.gov.uk

If you have any special requirements in order to attend this meeting, please let us know in advance
Large print version can be made available
The Development Management process is primarily concerned with issues of land use and has been set up to protect the public and the environment from the unacceptable planning activities of private individuals and development companies.

The Council has a duty to prepare Local Development Documents (DPDs) to provide a statutory framework for planning decisions. The Development Plan for South Norfolk currently consists of a suite of documents. The primary document which sets out the overarching planning strategy for the District and the local planning policies is the Joint Core Strategy for Broadland, Norwich and South Norfolk. The Strategy is broadly consistent with the National Planning Policy Framework (NPPF) and accompanying technical guidance and was adopted by South Norfolk Council in March 2011. It is the starting point in the determination of planning applications and as it has been endorsed by an independent Planning Inspector the policies within the plan can be given full weight when determining planning applications. South Norfolk Council is also in the process of preparing its Site Specific Policies and Proposals DPD, Area Action Plans and Development Management DPD. These documents will allocate specific areas of land for development, define settlement boundaries and provide criterion based policies giving a framework for assessing planning applications.

In accordance with legislation planning applications must be determined in accordance with the policies of the Development Plan, unless material considerations which are relevant to planning indicate otherwise.

The NPPF states that the purpose of the planning system is to achieve sustainable development. The core planning principles contained within the NPPF are summarised as:

- To be genuinely plan-led
- To drive and support sustainable economic development
- Seek high quality design
- Conserve and enhance the natural environment
- Encourage the effective use of land
- Conserve heritage assets

The factors to be used in determining applications will relate to the effect on the “public at large” and will not be those that refer to private interests. Personal circumstances of applicants “will rarely” be an influencing factor, and then only when the planning issues are finely balanced.

**THEREFORE** we will:

- Acknowledge the strength of our policies,
- Be consistent in the application of our policy, and
- If we need to adapt our policy, we will do it through the Local Plan process.

Decisions which are finely balanced, and which contradict policy will be recorded in detail, to explain and justify the decision, and the strength of the material planning reasons for doing so.

**LOCAL COUNCILS**

**OCCASIONALLY, THERE ARE CONFLICTS WITH THE VIEWS OF THE PARISH OR TOWN COUNCIL. WHY IS THIS?**

We ask local parish and town councils to recognise that their comments are taken into account. Where we disagree with those comments it will be because:

- Districts look to ‘wider’ policies, and national, regional and county planning strategy.
- Other consultation responses may have affected our recommendation.
- There is an honest difference of opinion.
A G E N D A

1. To report apologies for absence and identify substitute voting members (if any);

2. To deal with any items of business the Chairman decides should be considered as matters of urgency pursuant to Section 100B (4) (b) of the Local Government Act, 1972; [Urgent business may only be taken if, "by reason of special circumstances" (which will be recorded in the minutes), the Chairman of he meeting is of the opinion that the item should be considered as a matter of urgency.]

3. To receive Declarations of Interest from Members;
   (Please see flowchart and guidance attached, page 6)

4. Planning Applications and Other Development Control Matters;
   To consider the applications as listed below: (report attached – page 8)

<table>
<thead>
<tr>
<th>Item No.</th>
<th>Planning Ref No.</th>
<th>Parish</th>
<th>Site Address</th>
<th>Page No.</th>
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</thead>
<tbody>
<tr>
<td>1</td>
<td>2011/1821/F</td>
<td>WYMONDHAM</td>
<td>Former Sale Ground Site, Station Approach, Wymondham</td>
<td>11</td>
</tr>
<tr>
<td>2</td>
<td>2012/0154/F</td>
<td>WYMONDHAM</td>
<td>Land south of Postmill Close and east of Norwich Road, Wymondham</td>
<td>23</td>
</tr>
</tbody>
</table>

5. Sites Sub-Committee;

Please note that the Sub-Committee will only meet if a site visit is agreed by the Committee with the date and membership to be confirmed.
1. GUIDELINES FOR DETERMINING THE NEED TO VISIT AN APPLICATION SITE

The following guidelines are to assist Members to assess whether a Site Panel visit is required.

Site visits may be appropriate where:

(i) The particular details of a proposal are complex and/or the intended site layout or relationships between site boundaries/existing buildings are difficult to envisage other than by site assessment;

(ii) The impacts of new proposals on neighbour amenity e.g. shadowing, loss of light, physical impact of structure, visual amenity, adjacent land uses, wider landscape impacts can only be fully appreciated by site assessment/access to adjacent land uses/property;

(iii) The material planning considerations raised are finely balanced and Member assessment and judgement can only be concluded by assessing the issues directly on site;

(iv) It is expedient in the interests of local decision making to demonstrate that all aspects of a proposal have been considered on site.

Members should appreciate that site visits will not be appropriate in those cases where matters of fundamental planning policy are involved and there are no significant other material considerations to take into account. Equally, where an observer might feel that a site visit would be called for under any of the above criteria, members may decide it is unnecessary, e.g. because of their existing familiarity with the site or its environs or because, in their opinion, judgement can be adequately made on the basis of the written, visual and oral material before the Committee.

2. PUBLIC SPEAKING: PLANNING APPLICATIONS

Applications will normally be considered in the order in which they appear on the agenda. Each application will be presented in the following way:

- Initial presentation by planning officers followed by representations from:
  - The town or parish council - up to 5 minutes for member(s) or clerk;
  - Objector(s) - any number of speakers, up to 5 minutes in total;
  - The applicant, or agent or any supporters - any number of speakers up to 5 minutes in total;
  - Member consideration/decision.

TIMING: In front of you there are two screens which tell you how long you have left of your five minutes. After four minutes the circle on the screen turns amber and then it turns red after five minutes, at which point the Chairman will ask you to come to a conclusion.

MICROPHONES: In front of you there is a microphone which we ask you to use. Simply press the button to turn the microphone on and off

WHAT CAN I SAY AT THE MEETING? Please try to be brief and to the point. Limit your views to the planning application and relevant planning issues, for example: Planning policy, (conflict with policies in the Local Plan/Structure Plan, government guidance and planning case law), including previous decisions of the Council, design, appearance and layout, possible loss of light or overshadowing, noise disturbance and smell nuisance, impact on residential and visual amenity, highway safety and traffic issues, impact on trees/conservation area/listed buildings/environmental or nature conservation issues.
HEALTH AND SAFETY INFORMATION

<table>
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<tr>
<th>Fire alarm</th>
<th>If the fire alarm sounds please make your way to the nearest fire exit. Members of staff will be on hand to escort you to the evacuation point</th>
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<tr>
<td>Mobile phones</td>
<td>Please switch off your mobile phone or put it into silent mode</td>
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<tr>
<td>Toilets</td>
<td>The toilets can be found on your right and left of the lobby as you enter the Council Chamber</td>
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<td>Break</td>
<td>There will be a short comfort break after two hours if the meeting continues that long</td>
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<tr>
<td>Drinking water</td>
<td>A water dispenser is provided in the corner of the Council Chamber for your use</td>
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PLANNING APPLICATIONS AND OTHER DEVELOPMENT CONTROL MATTERS

Key to letters included within application reference number to identify application type – e.g. 07/96/3000/A – application for consent to display an advert

<table>
<thead>
<tr>
<th>A</th>
<th>Advert</th>
<th>G</th>
<th>Proposal by Government Department</th>
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<tr>
<td>AD</td>
<td>Certificate of Alternative Development</td>
<td>HZ</td>
<td>Hazardous Substance</td>
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<tr>
<td>CA</td>
<td>Conservation Area</td>
<td>LB</td>
<td>Listed Building</td>
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<td>CU</td>
<td>Change of Use</td>
<td>LE</td>
<td>Certificate of Lawful Existing development</td>
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<td>D</td>
<td>Reserved Matters (Detail following outline consent)</td>
<td>LP</td>
<td>Certificate of Lawful Proposed development</td>
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<td>F</td>
<td>Full (details included)</td>
<td>O</td>
<td>Outline (details reserved for later)</td>
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<tr>
<td>H</td>
<td>Householder – Full application relating to residential property</td>
<td>RVC</td>
<td>Removal/Variation of Condition</td>
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<tr>
<td>C</td>
<td>Application to be determined by County Council</td>
<td>SU</td>
<td>Proposal by Statutory Undertaker</td>
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Key to abbreviations used in Recommendations

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<th>S.P</th>
<th>Structure Plan</th>
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<td>South Norfolk Local Plan</td>
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<td>P.D</td>
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<tr>
<td>J.C.S</td>
<td>Joint Core Strategy</td>
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<tr>
<td>N.P.P.F</td>
<td>National Planning Policy Framework</td>
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Special Development Management Committee 20 November 2012

Agenda Item No. ___

PLANNING APPLICATIONS AND OTHER DEVELOPMENT CONTROL MATTERS

Report of Director of Development and Environment

Key to letters included within application reference number to identify application type – e.g. 07/96/3000/A – application for consent to display an advert

A Advert
AD Certificate of Alternative Development
CA Conservation Area
CU Change of Use
D Reserved Matters
F Full (details included)
H Householder – Full application relating to residential property
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G Proposal by Government Department
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Key to abbreviations used in Recommendations

S.P Structure Plan
S.N.L.P South Norfolk Local Plan
P.D Permitted Development – buildings and works which do not normally require planning permission. (The effect of the condition is to require planning permission for the buildings and works specified).
J.C.S Joint Core Strategy
N.P.P.F National Planning Policy Framework
Major applications or applications raising issues of significant precedent

GUIDANCE FOR THE CONSIDERATION OF APPLICATIONS 2011/1821 AND 2012/0154 FOR RETAIL DEVELOPMENT AT WYMONDHAM.

Members will be aware that planning applications should be assessed on their own merits and in the light of relevant planning policies and other material considerations. Retail policy requires decision makers to apply a Sequential Approach to proposals for retail development, such as in the case of these two applications. The NPPF sets out the Sequential Approach required as follows:

“24. Local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale.

25. This sequential approach should not be applied to applications for small scale rural offices or other small scale rural development.”

The Sequential Approach ensures that preference is given to sites which are accessible and well connected to the town centre, and where there are such sites applications on other sites are refused (see paragraph 27 which is quoted below).

However, the impact of retail development on the vitality and viability of town centres also has to be taken into account. On the subject of such impact the NPPF states as follows:

“26. When assessing applications for retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500 sq m). This should include assessment of:

- the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
- the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made.

27. Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the above factors, it should be refused.”

No retail development outside a town centre should be approved if it would have an unacceptable adverse impact on the town centre, even if it has sequential preference. It also follows that, when considering a retail application on a site which is not sequentially preferable, the cumulative impact of the proposal, together with any sequentially preferable site development (which should be delivered first) must be taken into account when assessing impact on the town centre.

In the light of the above, when considering two or more retail applications, it is first necessary to decide whether one is sequentially preferable to the other. If they are both accessible and well connected to the town centre, then the cumulative impact on the town centre and other planning considerations need careful consideration. If one site is preferable in sequential terms (ie it is accessible and well connected to the town centre whereas the other one is not) and is acceptable in all other respects then preference must be given to the sequentially preferred site and the cumulative impact of two may mean it is not appropriate to approve both.
In order to assess these two applications properly, it is strongly recommended that the Committee first hears representations about both applications and their sites, and then decide if either is sequentially preferable for Wymondham as a whole. Only then should Members move on to debate the merits of each particular application and reach resolutions about their determination.

Note:

Practice Guidance published by Communities and Local Government provides the following definitions:

**Convenience good expenditure**

Expenditure (including VAT as applicable) on goods in COICOP categories: Food and non-alcoholic beverages, Tobacco, Alcoholic beverages (off-trade), Newspapers and periodicals, Non-durable household goods.

**Comparison goods expenditure**

Expenditure (including VAT as applicable) on goods in COICOP categories: Clothing materials and garments, Shoes and other footwear, Materials for maintenance and repair of dwellings, Furniture and furnishings; carpets and other floor coverings, Household textiles, Major household appliances, whether electric or not, Small electric household appliances, Tools and miscellaneous accessories, Glassware, tableware and household utensils, Medical goods and other pharmaceutical products, Therapeutic appliances and equipment, Bicycles, Recording media, Games, toys and hobbies; sport and camping equipment; musical instruments, Gardens, plants and flowers, Pets and related products, Books and stationery, Audio-visual, photographic and information processing equipment, Appliances for personal care, Jewellery, watches and clocks, Other personal effects.
1. Appl. No : 2011/1821/F  
Parish : WYMONDHAM

Applicants Name : Bride Hall Developments  
Site Address : Former Sale Ground Site, Station Approach, Wymondham  
Proposal : Redevelopment (including site clearance and demolition) and construction of retail foodstore (Class A1) with associated parking, highways improvements, transport interchange, pedestrian and cycle routes and landscaping.

Recommendation : Had the application not been subject to appeal against non-determination, it would have been resolved to REFUSE the application for the following reasons.

1. The site does not meet the description of a preference site that is accessible and well connected to the town centre and so would conflict with the National Planning Policy Framework.
2. Cumulative retail impact together with development of the sequentially preferable site would cause harm to the vitality and viability of the Town Centre.

Introduction

This application is the subject of an appeal against non-determination, so the Council is no longer able to determine the application itself. Our determination of the application has been delayed by a variety of factors, including negotiation on highway matters, the need to seek specialist retail planning advice upon competing and conflicting evidence of retail impact from advisors to applicants and objectors and previous uncertainty regarding the status of the former Focus DIY Store and its relevance to cumulative retail impact. The appeal will be considered by a Planning Inspector at a public inquiry at which the Council will need to make its position clear regarding how it would have determined the application, had it been able. This report recommends that the Council’s case at the appeal should be that it would have refused the application as explained below.

1. Planning Policies

1.1 National Planning Policy Framework

Section 1: Building a strong competitive economy  
Section 2: Ensuring the vitality of town centres  
Section 4: Promoting sustainable transport  
Section 7: Requiring good design  
Section 12: Conserving and enhancing the historic environment

1.2 Joint Core Strategy

Policy 1: Addressing climate change and protecting environmental assets  
Policy 2: Promoting good design  
Policy 3: Energy and water  
Policy 5: The economy  
Policy 10: Locations for major new or expanded communities in the Norwich Policy Area  
Policy 13: Main Towns  
Policy 19: The hierarchy of centres  
Policy 20: Implementation
1.3 South Norfolk Local Plan

ENV 15: Species protection  
IMP 2: Landscaping  
IMP 6: Visual impact of parked cars (Part Consistent)  
IMP 8: Safe and free flow of traffic  
IMP 9: Residential amenity  
IMP 15: Setting of Listed Buildings  
SHO 2: Retail development - impact test (Part Consistent)  
TRA 1: Provision of pedestrian links  
TRA 3: Provision of cycling facilities  
TRA 17: Off site road improvements  
TRA 19: Parking standards  
UTL 14: Waste collection and recycling  
WYM 5: Employment allocations in Wymondham  

(The Department for Communities and Local Government have also published Practice Guidance on need, impact and the sequential approach. Although this pre-dates the NPPF it has not been cancelled and remains relevant)

2. Planning History

2.1 2003/1713/O Redevelopment for mixed residential and commercial use  
Approved  
8-06-2006

2.2 2009/0835/D Reserved Matters – 64 dwellings and 750 sqm office space  
Approved on Appeal

2.3 2009/0837/F Amendment to reduce buffer strip to 8 metres  
Approved 1-04-2010

2.4 2011/1555/EA Screening Opinion Request for foodstore development  
ES not required

3. Consultations

3.1 Wymondham Town Council : Response – No views or comments.

3.2 District Members  
L. Hornby : To be determined by Committee, possible highway issues.  
R. Savage : Object  
• Inadequate highways for traffic, – contrary IMP8  
• Traffic lights would make congestion worse.  
• Impact on Cemetery Lane unacceptable – would become a ‘rat-run’ but closure would be unacceptable.  
• Noise and disturbance to residents contrary to IMP9 and 10.  
• Not close enough to Town Centre to be of benefit.  
• Future development in south Wymondham would add to congestion at rail bridge.  
• Pre-empts the Wymondham Area Action Plan.

3.4 Wymondham Heritage Group :  
• Welcome coach parking spaces.  
• Welcome riverside walk.  
• Exterior design is disappointing – floating roof is incongruous.
3.5 NCC Highways: No objection subject to Travel Plan with bond secured by Sec. 106 Agreement.

Requires off-site improvements:
- Advanced stop lines to improve cycle facilities at Station Rd / Harts Farm Rd junction.
- Widening of Station Road between Harts Farm Rd and Ayton Rd junctions and increase radius on Ayton Road.
- Toucan Crossing to replace Zebra Crossing on Ayton Road.
- Re-align The Lizard junction with Station Road to improve visibility.
- Re-align Station Road.
- Re-align Cemetery Lane and its junction with Station Road.
- New bus stops, turning facility and stands.
- Funding for closure of Cemetery Lane.

Recommend conditions:
- Parking, servicing, loading areas to be provided.
- Construction worker parking to be agreed and provided.
- Construction traffic routing and management to be agreed and complied with.
- Wheel cleaning.
- Off-site highway improvement works.
- No works before Cemetery Lane Closure Order is promoted.
- Travel Plan submission and implementation.

3.6 Environment Agency: No objection subject to condition to agree details of surface water discharge attenuation.

3.7 Norfolk Rivers Drainage Board: Require 9m access strip clear of obstruction (negotiable).
- Drainage details to be agreed with Board.
- Note permission required for discharge and works.

3.8 Anglian Water Services Ltd: No response

3.9 Police Architectural Liaison Officer: No response

3.10 Norfolk Wildlife Trust: No objection in principle but need to mitigate impacts.
- Condition buffer zone and its management for water voles.
- Control of lighting to minimise impact on feeding bats along Tiffey corridor.

- Take account of habitat and amenity value of area.
- Manage riverside for water voles.
- Planting should be native to Norfolk.
- Riverside path would hinder creation of ‘wild strip’ – better to have interpretation boards.
- Protect feeding bats from lighting.
- Concern about flood risk and pollution.
- Support closure or traffic calming on Cemetery Lane.
3.12 Environmental Services:
- Need for detailed drainage scheme with management to avoid flood risk.
- No run-off to highways.

3.13 Conservation Officer:
Proposal includes enhancements to public realm
- Acknowledge rationale for siting building at western edge of site to facilitate pedestrian link.
- Landscaping helps soften car park and improves on existing.
- Area of ‘Public Realm’ respects station forecourt and extends public realm to form more pedestrian friendly area.
- Elevational treatments reflect local character and gives interest to building without being a pastiche.
- Overall improved road frontages with public space responding positively to the listed buildings as well as being sympathetic to grain and scale of the area.

3.14 Planning Policy:
See Appendix 4

3.15 Local Residents:
Objections:
- Inadequate road network.
- Risk to pedestrians from extra traffic.
- Increased risk to existing flooding under rail bridge.
- Noise incompatible with serene character of cemetery, historical rail station and nature reserve.
- Prefer out of town sites.
- Too far from Town centre to be of benefit.
- Adverse impact on wildlife.
- Vibration damage potential from extra traffic.
- Increased risk to residents pets from extra traffic.
- Extra traffic on Cemetery Lane would endanger pedestrians, cyclists and drivers.
- Cemetery Lane should be closed.
- Pre-empt LDF process.
Support:
- Benefit local residents.
- Good competition for Waitrose.
- Welcome transport improvements.
- Improve poor appearance of the site.

Other interested parties:

3.16 Mid-Norfolk Railway:
- Note plans for new interchange station near site.
- Require access for cars from east end of Cemetery Lane and service vehicles from west (No objection as access has been discussed with applicant).
- Contributions via Sec. 106 Agreement requested.

3.17 Endurance Estates (potential developer at south Wymondham):
Ensure proposal is compatible with South Wymondham proposals.

3.18 NJL Consulting (acting for Co-Op):
- Contrary Policy WYM5 which allocates site for employment uses.
- May be detrimental to Town Centre, particularly together with other proposals.
• Supporting text to WYM5 notes the constraints on development of sensitive Tiffey Valley and Listed Buildings.
• Note 2007 retail assessment by GVA identified only modest need for extra convenience floorspace.
• Unacceptable impact on Co-Op. Suggest likely 20% trade diversion not 8% as claimed.
• Note need to consider cumulative impact with other proposals.

4. Assessment

4.1 This application proposes redevelopment of the former sale-ground site on Station Road extending to approximately 3.47 Ha. The proposed retail store would have a gross floorspace of 3,554 sqm (1,858 sqm net retail). The size of the building would be 55m by 64m and have a maximum height of approximately 10m at the front canopy, but with side elevations more generally 7m high. 208 customer parking spaces are proposed plus 15 cycle and 12 motorcycle spaces together with 6 staff spaces. A service yard with separate access from Cemetery Lane is also included. Along with on and off-site highway improvements (see para. 3.5 above), the scheme would include facilities for buses and coaches with bus stops and turning facility on the re-aligned Cemetery Lane. In addition to drawings, the application is supported by a range of documents including Design and Access Statement; Planning and Retail Statement; Heritage Statement; Energy and Sustainability Statement; Statement of Community Involvement; Transport Assessment; Travel Plan; Flood Risk Assessment; Drainage Strategy; Noise Report; Habitat Survey; Arboricultural Impact, Constraints and Protection Reports; and Landscape Strategy and Masterplan.

4.2 The site is allocated for employment development in the SNLP but planning permission has also been granted for 64 dwellings and a car park on the site as noted above. In these circumstances, I do not consider that the proposed retail use, which would generate employment, could be objected to simply because it conflicts with the SNLP allocation.

4.3 As indicated in the National Planning Policy Framework (NPPF), assessment of retail applications of this nature should include fundamental issues of retail impact and the application of a sequential test as well as more common detailed planning issues. These fundamental issues are considered first.

4.4 (Note: There is repetition in parts of the Retail Impact and Sequential Test sections of the reports for both applications 2011/1821 and 2012/0154 because the issues are similar in each case)

Retail Impact

4.5 Section 2 of the NPPF makes it clear that town centres should continue to be supported and protected from out of centre development that would have a significant adverse impact on their vitality and viability. The NPPF requires that applications for retail proposals outside town centres are subject to retail impact assessment. The Joint Core Strategy (JCS) Policies 10 and 13 identify Wymondham as a location for growth. The supporting text suggests this will include moderate expansion of the town centre for convenience and comparison shopping. Policy SHO2 of SNLP echoes the requirement to consider impact on the town centre.
4.6 The application is supported by a retail statement that concludes that the proposal would not have an adverse impact on the town centre. This is largely due to the finding that main food shopping comprises only a minor proportion (0 to 10%) of the existing Town Centre stores’ turnover, so that any diversion of this trade would not have a significant adverse impact on the Centre as a whole. The main trade diversion is predicted to be from other out of centre stores in Wymondham and elsewhere. It is argued that by improving the convenience retail facilities available in Wymondham, some of the convenience shopping currently attracted away from the town (eg. to Attleborough or Norwich) would be drawn back and consequently benefit the Town overall.

4.7 In contrast, an objection letter has been received from NJL Consulting on behalf of the Co-operative Group who have a store in the Town Centre. This includes a retail impact statement claiming to show more significant adverse impact on the Town Centre from even one extra store (over 22% trade diversion). The objection consequently suggests that all new proposals should be refused.

4.8 The Council have employed retail consultants GVA to scrutinise the retail impact information submitted. A copy of their latest advice is attached as Appendix 2. This in turn refers to the ‘Wymondham Retail Strategy 2012’ document which they have prepared for the Council to inform work on the Area Action Plan (AAP). By the time of the Committee meeting, the Retail Strategy and draft AAP will have been considered by Cabinet and will, subject to approval, be published separately and made available at the meeting. The draft AAP should be treated as emerging policy that may be a consideration, but not regarded as having the full weight of approved policy, which has been tested by public consultation.

4.9 GVA advise that Wymondham Town Centre could sustain one new foodstore beyond the Primary Shopping Area. This relies on the ‘claw-back’ of available convenience spending, 60.5% of which currently ‘leaks’ to other shopping areas beyond Wymondham. Although there would be some trade diversion from the Town Centre, GVA advise that the Co-Op store is more robust than suggested by their agent and that the Centre overall would not suffer to an unacceptable extent from a single new food-store.

4.10 However, GVA advise that two new food-stores would cause unacceptable and irreversible impact on the Centre. The cumulative trade draw of two stores for both convenience and non-convenience goods (because the food-stores would also provide a choice of non-food items and provide convenient parking) would cause significant adverse impact on the vitality and viability of the Town Centre. GVA considers that the greater capacity claimed by the applicant’s agents is too optimistic and is based on unrealistic assumptions about future growth in convenience goods expenditure; underestimates the turnover of the new store; and assumes an unrealistic wide pattern of trade draw which artificially reduces the predicted impact on the Town Centre. GVA’s assessment finds that there would be higher trade draw from town centre floorspace with consequent adverse impact, threatening the financial viability of businesses including key stores such as the Co-Op. Although main food shopping may account for a minor portion of total Town Centre trade, food shopping is still the main reason for people visiting the Centre and the reduction in this function would have serious knock-on adverse impact on the vitality and viability of the Town Centre overall.

**Sequential Approach**

4.11 The NPPF requires local authorities to apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up to date local plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre.
4.12 Notwithstanding the JCS reference to ‘moderate expansion of the Town Centre’, no sites are apparently available within or adjacent to the Primary Shopping Area for a new convenience store. As noted by GVA, the edge of centre Kings Meadow site would be sequentially preferable. However, this site is in use for sport and recreational purposes which would require replacement/ relocation. Furthermore, the recent well publicised approach by Asda to the Town Council (as owners) to develop the site proved unsuccessful and contentious with some local people. In these circumstances I do not consider that this site can be regarded as ‘available’ or deliverable for the purpose of the sequential test.

4.13 Two other sites have been identified as available for retail development. One of these at Postmill Close, is the subject of a planning application which is also reported within this agenda. I am led to understand that an application for the other site on Ayton Road may be submitted shortly. The location of the sites is shown on the plan attached as Appendix 3. The distance of each site measured along the relevant pedestrian route from the proposed pedestrian access to each site to the nearest edge of the Primary Shopping Area is as follows: Saleground Site – 460m; Postmill Close – 340m; Ayton Road – 312m.

4.14 As noted above, the NPPF states that preference should be given to accessible sites that are well connected to the town centre. The applicant’s agents point out that the site nearest to the Town Centre is not necessarily the sequentially preferable site, as is demonstrated by a number of appeal decisions to which they refer. Doubts regarding the suitability, availability or viability of various proposals have led to sites more distant from town centres being approved before sites which appear locationally preferable (closer to the town centre). Application of the Sequential Approach is consequently not just about physical distance from the Town Centre but can be influenced by other local circumstances. The CLG Practice Guidance (paras 6.5, 6.6 and 6.7) defines edge of centre and advises as follows:

“In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances. For example, local topography will affect pedestrians’ perceptions of easy walking distances from the centre. Other considerations include barriers, such as crossing major roads and car parks, the attractiveness and perceived safety of the route and the strength of attraction and size of the town centre. A site will not be well connected to a centre where it is physically separated from it by a barrier such as a major road, railway line or river and there is no existing or proposed pedestrian route which provides safe and convenient access to the centre.

As well as existing and proposed physical links between the site/proposals and the PSA, the degree of functional linkage between the two will have a major effect on the level of linked trips. People may be more willing to walk between an edge of centre site and the PSA if they each have strong, complementary attractions.”

4.15 The agents point out that the Saleground site offers accessibility by non-car travel, being next to the rail station and accessible by bus. The proposed development includes a layby for bus access with 4 bus stops and enables buses to turn using the mini-roundabout at the new site entrance. The development would also deliver other off-site highway improvements (listed at paragraph 3.5) along Station Road and at the junctions in the vicinity. This represents an improvement over the current situation, although improvements would also be likely to be delivered by other forms of development on the site (for example the approved residential scheme 2009/0835/D provided circulatory bus access to the station through the site, 2 coach spaces and an additional 40 space car park). It should also be noted that the Postmill Close site is also well served by buses along Norwich Road and is closer to the greater bulk of Wymondham’s residential area to the north.
The agents also suggest that the site is on a desire line from the rail station to the Town Centre. While the Saleground site may be more accessible by train than the Postmill Close site, it does not necessarily follow that people visiting the proposed Station Road (Saleground) foodstore from the rail station are any more likely to extend their journey to visit the Town Centre than persons visiting the Postmill Close site. It should be noted that the Postmill Close site is close to a medical centre and to the Town’s Leisure Centre and Secondary School, which can also be regarded as complementary attractions to the Town Centre.

4.16 The agents suggest that the pedestrian route over the junction at Harts Farm Road is not a barrier, but rather is a safe, regular, signalised crossing that assists pedestrians to access the Town Centre.

4.17 In contrast, it will be noted that GVA regard the presence of the London Road/ Harts Farm Road and the junction with Station Road (in their present form) as a barrier to shoppers contemplating visiting the Town Centre from both the Saleground and Ayton Road sites. Sites should be located to encourage car borne and other shoppers at a proposed store to extend their shopping trip to the town centre. The Saleground site, however, would require pedestrians and cyclists to negotiate considerable physical barriers at the junction at Harts Farm Road. This road was designed as a major trunk road and so is visually very separate from surrounding uses. It contains wide highway splays, inactive space and few frontages and still carries traffic at speeds that are higher than most urban streets. The combination of these features creates severance of the urban fabric and public realm of Wymondham and distinct separation of uses to the south from the town centre and residential areas to the north. Sites to the south are, therefore, significantly disconnected from and their accessibility to the town centre constrained.

4.18 The Council’s Policy Team have also undertaken an assessment of the three sites and their findings are summarised in a table attached as Appendix 4.

4.19 Although the Ayton Road site is marginally the closest to the Town Centre, the London Road/ Harts Farm Road is similarly a barrier to the Town Centre and the bulk of the Town to the north, so its accessibility and connection to the Centre are also compromised. Although informal contact has been made by would-be developers and it has been promoted in consultation comments for the Area Action Plan, no application for the site has been received and details of the site’s deliverability have not been fully explored. However, for the reasons set out above, neither the Saleground site nor the Ayton Road site have preference and do not conform with the NPPF.

4.20 The Postmill Close site, although slightly beyond the 300m distance regarded as the outer limit for an edge of centre location, is the site preferred both by GVA and the Policy Team’s analysis. The site benefits from bus services running along Norwich Road and it also has the advantage of being more accessible to the bulk of the Town which lies to the north. A shopper at the proposed store could walk easily to the town centre in a few minutes through attractive residential streets, directly connected to shops and facilities. The current application for the site has shown that a revised vehicular access is possible from Harts Farm Road which has the support of NCC Highways. Regardless of the merits of the particular application currently submitted on that site, I consider that the Postmill Close site (unlike the Saleground site) can be regarded as accessible and well connected to the Town Centre.

4.21 The agents for the Saleground site have raised a number of criticisms of the Postmill Close proposal which I would summarise and comment on as follows:

- The site lacks road frontage and visibility from Norwich Road.
While this may be a commercial consideration it could be overcome by appropriate signage. The agents have provided confirmation of retailer interest in the site. I do not consider this issue materially detracts from the planning merits of the site.

- The site is constrained and necessitates an ‘L’ shaped building.

This may be less convenient than a larger site, but planning authorities and developers should show flexibility in the adaptation of development proposals when applying the Sequential Approach. I do not regard this factor as fatal to the suitability of the site.

- The site has inadequate servicing including conflict between delivery vehicles and customer traffic.

The access from Postmill Close is shared by delivery and customer vehicles and the route to the service yard does pass through part of the customer car-park. While this may not be ideal, the Highway Authority has not objected to the scheme. It is not surprising that such a site within an established built up area, close to a town centre, will be constrained by limited space to some degree. I do not consider that the service arrangements justify refusal nor do they render the site unsuitable.

- Access arrangement involves land in different ownerships which raises doubt as to the availability and viability of the scheme.

No objections have been received from the other land owners to suggest their land would not be available. I do not consider that multiple site ownership is unusual for such an urban development site. I have no reason to believe that agreement could not be reached between the parties to deliver the site. A condition is recommended to ensure the off-site works are delivered with the development.

- Lack of pre-application public consultation/engagement and larger number of public objections to the Postmill Close application.

The applicant for the Postmill Close site did not arrange for pre-application public consultations, whereas the Saleground applicant undertook a range of measures including public exhibitions and feedback. While such community engagement is encouraged, and welcome, it is not a statutory requirement. It is correct that there were far more objection letters to the Postmill Close application. The most common concern related to the traffic implications on Norwich Road which was partly addressed by a subsequent revision linking the access to Harts Farm Road. I do not consider that the quantity of objections, nor the lack of pre-application public engagement disqualifies the site from being preferred in retail policy terms.

Taking all the above factors into account, I conclude that Postmill Close should be regarded as a preference site (a site within paragraph 24 of the NPPF for out of centre sites), whereas any site south of the London Road/Harts Farm Road junction should not, unless or until the disconnection and severance of those sites from the town centre caused in particular by Harts Farm Road is addressed. In these circumstances, and as there are no current proposals to remediate the separation issues of Harts Farm Road, approval of this application would be contrary to the NPPF.

Other Considerations

Highways

Although local concerns about highway capacity and safety have been raised, it will be noted that NCC Highways do not object to the application, subject to a range of conditions and Section 106 Agreement. The proposals would involve significant changes to the highway in the vicinity of the site, including re-aligning Cemetery lane and providing a
turning area for buses and coaches. The proposals have been designed to be compatible with potential improvements to the Rightup Lane junction with Station Road and the constriction under the rail bridge, to facilitate possible development in the South Wymondham area. Decisions about development in south Wymondham are consequently not prejudiced by this proposal.

4.29 The closure of Cemetery Lane is regarded as desirable as part of the development. Such closure is not within the control of the developer however, and would be the subject of a separate process, the outcome of which could not be guaranteed. Funding for the promotion of the necessary Traffic Order is therefore required by the Highway Authority. Provided that appropriate conditions and legal agreement are secured, I consider that an objection on highway grounds could not be sustained.

Drainage

4.30 Although no response was received from Anglian Water, the capacity of the foul sewerage system in the locality has recently been increased (in agreement with Anglian Water) to accommodate residential development on Rightup Lane and also the 64 dwellings and 750sqm of offices approved on this site. I therefore have no reason to expect that insufficient capacity exists to serve this retail proposal in its place.

4.31 Members will be aware of the well publicised flooding problem under the rail bridge near this site. I am led to believe that a solution to the problem has been found related to the unblocking and upgrading of the surface water drain that leads from the bridge to the river Tiffey. However, the development under consideration does not discharge water in the direction of the bridge, but rather direct to the Tiffey via proposed attenuation measures. It will be noted that the Environment Agency has approved the submitted Flood Risk Assessment and do not object to the application, subject to appropriate conditions. There is consequently no reason to believe that the development would exacerbate any flooding problem.

Design and Heritage Assets

4.32 The application site is within an area proposed as an extension to the Wymondham Conservation Area although the site itself has been vacant and rather unsightly for a considerable time, even before the current hoardings were erected. The Station buildings and adjacent cottages are listed buildings so the impact of the development on their setting as well as the proposed Conservation Area must be a consideration. The site occupies a prominent location and would be a significant feature on the southern approach to the Town and particularly for those arriving by rail.

4.33 The proposed building design is clearly commercial and the sides and rear would have a simple form, with sheet cladding on a brick base. In contrast, the front (eastern) elevation has extensive glazing and timber cladding. A timber canopy feature is also proposed higher than the rest of the building above its entrance and along part of the front elevation. The entrance corner is further emphasised by flint gabion walls set in front of the building’s east and north elevations but linked by the canopy.

4.34 Given the necessary scale and form of the building, I consider that its elevational treatments are compatible with local traditional materials and honestly reflect its form and purpose. The impact of the scale of the building is reduced by setting it back from Station Road and also by the change of ground levels. This level change assists the relationship with the listed buildings which stand on higher ground so that the new building would not exceed the height of the Station buildings.
4.35 Hard and soft landscaping is proposed to provide a setting for the building and mitigate the appearance of the parking area. The layout creates a publicly accessible area in front of the Station which continues as a link through the site to Station Road, passing the front of the store. A path is also proposed parallel to the Tiffey along the north side of the site in recognition of the local ambition to create a riverside walk, linking to Tolls Meadow further to the west.

4.36 The Council’s Design Officer has been involved in negotiations resulting in amendments to the scheme and raises no objection.

4.37 The building would have a harsher appearance from the west along Cemetery Lane, due to its plain rear elevation and proximity to that boundary. However it adjoins vacant land with the Council owned car park beyond, so its setting is perhaps less sensitive from this direction. The highway works to Cemetery Lane would increase the areas of hard surface at its eastern end. This is not entirely alien to the commercial character of the station complex however, and the benefits in terms of bus/ coach access are also significant. A not dissimilar road layout was approved as part of the previous residential scheme.

4.38 On balance, I consider that the development would enhance rather than detract from the present character and appearance of the area. I do not consider that the scheme should be refused on design or heritage impact grounds.

Ecology

4.39 The majority of the site is derelict and barren. Ecological interest on the site is focussed on the northern edge adjacent to the River Tiffey. As with previous approved development, an 8m strip of land is reserved for management as a ‘wildlife corridor’ and buffer zone along the watercourse. The Norfolk Wildlife Trust does not object in principle, subject to this feature and appropriate conditions to control lighting. I note the concerns of the local Nature Group, but I consider that, with the appropriate conditions imposed, no harm to ecological interests could be shown sufficient to refuse the application on this issue.

4.40 Although other detailed issues such as residential amenity, landscaping and sustainable design features are of relevance, I consider that these could be satisfactorily addressed by the imposition of planning conditions.

5 Conclusion

5.1 I conclude that, although the proposal raises no insurmountable problems in respect of its detailed merits, it does not meet the description of an out of centre preference site and so conflicts with the NPPF. With regard to the issue of retail impact, the advice from the Council’s independent retail consultant is that only one store should be approved (on a sequential basis) and that any additional store would be likely to have an unacceptable impact on the Town Centre. It follows that the application subject of this report should be refused.

Contact Officer, Telephone Number and E-mail: Chris Trett, 01508 533794, ctrett@s-norfolk.gov.uk
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<td>2. <strong>Appl. No</strong></td>
<td>2012/0154/F</td>
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<tr>
<td><strong>Parish</strong></td>
<td>WYMONDHAM</td>
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<tr>
<td><strong>Applicants Name</strong></td>
<td>Retail Development Partnership</td>
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<tr>
<td><strong>Site Address</strong></td>
<td>Land south of Postmill Close &amp; east of Norwich Road, Wymondham, Norfolk</td>
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<tr>
<td><strong>Proposal</strong></td>
<td>Proposed development of a convenience goods superstore (GEA 3,720 sqm), car parking and services on land at Norwich Road/Postmill Close, and new access road to Harts Farm Road.</td>
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<td><strong>Recommendation</strong></td>
<td>Authorise DDE to Approve with conditions.</td>
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<td>1. Full permission time limit</td>
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<td>2. Compliance with amended plans</td>
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<td>3. Limit retail and convenience/comparison goods</td>
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<td>4. Levels</td>
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<td>5. Landscaping</td>
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<td>6. Materials and surfacing</td>
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<td>7. Boundary treatments</td>
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<td>8. Scheme to restrict anti-social behaviour</td>
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<td>9. Scheme to deliver sustainable design and 10% renewable energy</td>
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<td>10. Cease car sales use</td>
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<td>11. Contamination assessment and mitigation</td>
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<td>12. Details of surface water drainage and implementation</td>
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<td>13. External lighting details</td>
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<td>14. Details of acoustic screening</td>
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<td>15. Restricted hours for loading/unloading</td>
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<td>16. Details of plant and equipment</td>
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<td>17. Details of recycling facilities</td>
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<td>18. Provision of new access</td>
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<td>19. Maximum gradient</td>
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<td>20. No obstruction to new access road</td>
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<td>21. Visibility splays</td>
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<td>22. Provision of parking and service areas</td>
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<td>23. Cycle parking</td>
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<td>24. Details of construction traffic parking, routing and management</td>
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<td>25. Wheel cleaning</td>
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<td>26. Off-site highway improvements</td>
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<td>27. Travel Plan</td>
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**(Subject to referral of application to Secretary of State under the Town and Country Planning (Consultation) (England) Direction 2009)**

**Introduction**

This application was subsequent to the proposal from Bride Hall Developments on the former Sale Ground site and is for determination. The prime considerations are those relating to national and local policy; retail impact and the sequential approach to development. Should Members be minded to approve the application, as recommended, then it will require referral to the Secretary of State for his consideration, as the scale of the proposal, together with that of Station Road, could constitute major development of significant impact.
1. Planning Policy

1.1 National Planning Policy Framework
- Section 1: Building a strong competitive economy
- Section 2: Ensuring the vitality of town centres
- Section 4: Promoting sustainable transport
- Section 7: Requiring good design
- Section 12: Conserving and enhancing the historic environment

1.2 Joint Core Strategy
- Policy 1: Addressing climate change and protecting environmental assets
- Policy 2: Promoting good design
- Policy 3: Energy and water
- Policy 5: The economy
- Policy 10: Locations for major new or expanded communities in the Norwich Policy Area
- Policy 13: Main Towns
- Policy 19: The hierarchy of centres
- Policy 20: Implementation

1.3 South Norfolk Local Plan
- ENV 15: Species protection
- IMP 2: Landscaping
- IMP 6: Visual impact of parked cars (Part Consistent)
- IMP 8: Safe and free flow of traffic
- IMP 9: Residential amenity
- IMP 15: Setting of Listed Buildings
- SHO 2: Retail development - impact test (Part Consistent)
- TRA 1: Provision of pedestrian links
- TRA 3: Provision of cycling facilities
- TRA 17: Off site road improvements
- TRA 19: Parking standards
- UTL 14: Waste collection and recycling
- WYM 5: Employment allocations in Wymondham

(The Department for Communities and Local Government have also published Practice Guidance on need, impact and the sequential approach. Although this pre-dates the NPPF it has not been cancelled and remains relevant)

2. Planning History

2.1 2006/1240/O Residential development (20 units) (Abbey Cars site) Refused 28-07-2006 (Appeal dismissed)

2.2 2011/1727/O 18 Flats (Abbey cars site) Refused Appeal lodged but not determined

2.3 2012/0146/EA Screening Opinion Request for supermarket development ES not required

2.4 2012/0155/CA Demolition of existing buildings Not determined

3. Consultations

3.1 Wymondham Town Council: Approve, subject to views of Highways Officer

3.2 District Member: Councillor Savage: Support access via Harts Farm Road
3.3 NCC Highways: There is a preferable alignment for the access, but this involves land not in the applicant’s control. The submitted scheme is acceptable, however, subject to off-site measures including,
- New access road from Harts Farm Road to Postmill Close;
- New pedestrian crossing on Harts Farm Road;
- A new footway from Papillon Road to the new pedestrian crossing;

Plus, Travel Plan and bond secured by Sec. 106 Agreement, and subject to conditions:
- Access and drainage before use commences;
- Maximum gradient 1:12;
- No gates or obstruction across access unless approved;
- Visibility splays;
- Access, parking, servicing areas before use;
- Cycle parking provision;
- Construction worker parking details to be agreed and provided;
- Construction traffic management and routing to be agreed and complied with;
- Wheel cleaning facilities;
- Details of off-site highway improvements to be agreed before development starts and implemented before use commences;
- Interim Travel Plan agreed before development starts, full Travel Plan during first year of use;

3.5 Environment Agency: 
- Inadequate information in relation to surface water management (additional information submitted and further EA comments awaited).
- Require conditions for ground contamination investigation and remediation.
- Ensure adequate pollution measures are in place.

3.6 Anglian Water Services Ltd: 
- Adequate capacity in foul sewerage and treatment works exists to serve the development.
- Surface Water information not acceptable – require condition to agree details.

3.7 Environmental Services (Protection): Recommend conditions:
- Contaminated land condition.
- Surface water drainage details to be agreed.
- Details of acoustic screening/housing and noise attenuation.
- No delivery/unloading/machinery operation 23.00 to 07.00.
- Details of all plant to be agreed.
- Condition external lighting

3.8 Norfolk Constabulary: Consider measures to deter crime and anti-social behaviour including features to prevent inappropriate use of car park, avoid ‘blind spots’ to facilitate CCTV use if necessary.

3.9 Planning Policy: See Appendix 4
3.10 Local Residents: Original Submission.

Objections:
- Norwich Road access too congested, danger to pedestrians, including school children.
- Increased noise and pollution from traffic on Norwich Road.
- Should wait for Area Action Plan.
- Should contribute more to the Town.
- Vehicular access should be from Harts Farm Road, not Norwich Road.
- Town does not need another supermarket.
- Query what will happen to boundary hedge.
- Require noise buffer and security to residential properties.
- Maintain access to Scout and Guide HQ.
- Inadequate parking for the size of store.
- Additional litter.
- Problems arising from sale of alcohol.
- Should be on edge of town away from residents.

57 signature petition from residents of Norwich Road raising objection to additional traffic onto Norwich road with attendant safety concerns

Support
- Good use for brown-field site.
- Will benefit site which needs a to be tidied up.

Comments on amended access proposal:
- In favour of development but vehicular access should be from Harts Farm Road only.
- Concerns about potential ‘rat-run’.
- Still concerned about congestion and safety issues on Norwich Road.

Other Parties

3.11 Trustees of Central Hall: Loss of income from Central Hall car park as a result of supermarket free parking would adversely affect the financial viability of Central Hall

3.12 Wymondham Scout and Guide Hall Management Committee

- Require continued vehicular access across site.
- Would like to explore possibility of new service connections with developer.

3.13 Fairland United Reformed Church: Local Minister occupies Manse (no.28) adjoining site. Support in principle but comments:
- Congestion on Norwich Road and junctions.
- Need to clarify boundary treatment between car park and garden.
- No recycling bins abutting garden boundary.

3.14 Co-Operative Group (operate store in town centre) – via agent NJL Consulting

Object
- No supporting Development Plan basis to support proposal.
- Consider cumulative impact with other proposals.
- Turnover figure used in impact assessment for CO-Op is significantly in excess of actual turnover.
- King’s Meadow might become available in the future.
- Loss of employment land contrary JCS Policy 5.
3.15 Bride Hall Developments Ltd (applicants for application 2011/1821 on former Saleground, Station Road) – via agent DPP now AR Planning

Object
- Unsuitable site and design.
- Inadequate transport assessment.
- Inadequate service yard size.
- Conflict between delivery vehicles and customers as they have to pass through parking area.
- Design sits awkwardly on site.
- Lacks road frontage so only has vehicular access which has negative impact on Conservation Area.
- Size, scale and bulk of building adversely affects Conservation Area.
- Harsh visual impact of car park with little landscaping.
- Poor relationship to residential properties, likely disturbance.
- Loss of employment development contrary JCS Policy 5.
- Lack of community involvement.

4. Assessment

4.1 The application site extends to 1.236 Ha and was formerly a coach company depot. The site is now mostly dilapidated and vacant except some parts that are still used for workshop purposes. Vehicular access to the main part of the site is currently direct from Norwich Road, although part has access onto Postmill Close. The site has residential properties adjoining to the south and west and industrial units to the east. To the north, on the opposite side of Postmill Close is a Veterinary Centre and more residential properties extending along Norwich Road.

4.2 The application proposes a building with gross floorspace of 3,720sqm of which 1,097 sqm is on a mezzanine floor for non-retail sales use. The net retail floor area is given as 2,022 sqm. The building form is mostly single storey with a pitched pantile roof slope rising from 4.5 m high eaves, concealing a flat roof. The two storey section has eaves at 7.5m rising to a maximum 8.5m. The elevation treatments are brickwork with render above and also incorporating flint sections and exposed timber trusses.

4.3 The site layout provides 200 parking spaces and a service yard sharing the same access from Postmill Close. The original submission envisaged vehicular access solely via Norwich Road. The scheme was revised to provide a vehicular link through to Harts Farm Road through a car sales site.

4.4 The application is supported by a range of plans and documents including a Planning Statement; Envirocheck; Flood Risk Assessment; Arboricultural Impact Assessment; Protected Species Survey; Transport Assessment; Heritage Assessment; Sustainability Assessment; and Retail Assessments.

4.5 The site has no allocation in the SNLP or recent history of planning permission. The previous use as a coach depot would be regarded as a ‘sui generis’ use (not within any particular Use Class). The proposed retail development anticipates providing 120 full-time and 100 part-time jobs (180 full-time equivalent jobs). In these circumstances I would not raise objection to the development on the grounds of loss of employment land or conflict with the SNLP.

4.6 As indicated in the National Planning Policy Framework (NPPF), assessment of retail applications of this nature should include fundamental issues of retail impact and the application of a sequential test as well as more detailed planning issues. These fundamental issues are considered first.

4.7 (Note: There is repetition in parts of the Retail Impact and Sequential Test sections of the reports for both applications 2011/1821 and 2012/0154 because the issues are similar in each case)
Retail Impact

4.8 Section 2 of the NPPF makes it clear that town centres should continue to be supported and protected from out of centre development that would have a significant adverse impact on their vitality and viability. The NPPF requires that applications for retail proposals outside town centres are subject to retail impact assessment. The Joint Core Strategy (JCS) Policies 10 and 13 identify Wymondham as a location for growth. The supporting text suggests this will include moderate expansion of the town centre for convenience and comparison shopping. Policy SHO2 of SNLP echoes the requirement to consider impact on the town centre.

4.9 The application is supported by a retail statement and supplementary information that suggests that the proposal would not have an adverse impact on the Town Centre, even if additional convenience floorspace (such as the former Focus store) were to come forward. This is a similar conclusion as that arrived at for the planning application on the Saleground site (2011/1821) also reported on this agenda.

4.10 Contradictory evidence has been submitted by NJL Consulting on behalf of the Co-operative Group who has a store in the Town Centre. This includes a retail impact statement claiming to show more significant adverse impact on the Town Centre from even one extra store (over 22% trade diversion). The objection consequently suggests that all new proposals should be refused.

4.11 The Council have employed retail consultants GVA to scrutinise the retail impact information submitted. A copy of their latest advice is attached as Appendix 2. This in turn refers to the ‘Wymondham Retail Strategy 2012’ document which they have prepared for the Council to inform work on the Area Action Plan (AAP). By the time of the Committee meeting, the Retail Strategy and draft AAP will have been considered by Cabinet and will, subject to approval, be published separately. The draft AAP should be treated as emerging policy that may be a consideration, but not regarded as having the full weight of approved policy, which has been tested by public consultation.

4.12 GVA advise that Wymondham Town Centre could sustain one new foodstore beyond the Primary Shopping Area. This relies on the ‘claw-back’ of available convenience spending, 60.5% of which currently ‘leaks’ to other shopping areas beyond Wymondham. Although there would be some trade diversion from the Town Centre, GVA advise that the Co-Op store is more robust than suggested by their agent and that the Centre overall would not suffer to an unacceptable extent from a single new food-store.

4.13 However, GVA advise that two new food-stores would cause unacceptable and irreversible impact on the Centre. The cumulative trade draw of two stores for both convenience and non-convenience goods (because the food-stores would also provide a choice of non-food items and convenient parking) would cause significant adverse impact on the vitality and viability of the Town Centre. GVA considers that the greater capacity claimed by the applicant’s agents is too optimistic and is based on unrealistic assumptions about future growth in convenience goods expenditure; underestimates the turnover of the new store; and assumes an unrealistic wide pattern of trade draw which artificially reduces the predicted impact on the Town Centre. GVA’s assessment finds that there would be higher trade draw from town centre floorspace with consequent adverse impact, threatening the financial viability of businesses including key stores such as the Co-Op. Although main food shopping may account for a minor portion of total Town Centre trade, food shopping is still the main reason for people visiting the Centre and the reduction in this function would have serious knock-on adverse impact on the vitality and viability of the Town Centre overall.

4.14 If permission were to be granted, then a condition restricting the amount of retail floorspace and the size of convenience and comparison goods sales areas would need to be imposed to ensure retail impact does not exceed acceptable levels.
The NPPF requires local authorities to apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up to date local plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre.

Notwithstanding the JCS reference to ‘moderate expansion of the Town Centre’, no sites are apparently available within or adjacent to the Primary Shopping Area for a new convenience store. As noted by GVA, the edge of centre Kings Meadow site would be sequentially preferable. However, this site is in use for sport and recreational purposes which would require replacement/ relocation. Furthermore, the recent well publicised approach by Asda to the Town Council (as owners) to develop the site proved unsuccessful and contentious with some local people. In these circumstances I do not consider that this site can be regarded as ‘available’ or deliverable for the purpose of the sequential test.

Two other sites have been identified as available for retail development. One of these at the former saleground on Station Road, is the subject of a planning application which is reported earlier within this agenda (2011/1821). I am led to understand that an application for the other site on Ayton Road may be submitted shortly. The location of the sites is shown on the plan attached as Appendix 3. The distance of each site measured along the relevant pedestrian route from the proposed pedestrian access to each site to the nearest edge of the Primary Shopping Area is as follows: Saleground Site – 460m; Postmill Close – 340m; Ayton Road – 312m.

As noted above, the NPPF indicates that preference should be given to accessible sites that are well connected to the town centre. The agents for the Saleground application point out that the site nearest to the Town Centre is not necessarily the sequentially preferable site as is demonstrated by a number of appeal decisions to which they refer. Doubts regarding the suitability, availability or viability of various proposals have led to sites more distant from town centres being approved before sites which appear locationally preferable (closer to the town centre). Application of the Sequential Approach is consequently not just about physical distance from the Town Centre, but can be influenced by other local circumstances. The CLG Practice Guidance (paras 6.6 and 6.7) advises as follows:

“In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances. For example, local topography will affect pedestrians’ perceptions of easy walking distances from the centre. Other considerations include barriers, such as crossing major roads and car parks, the attractiveness and perceived safety of the route and the strength of attraction and size of the town centre. A site will not be well connected to a centre where it is physically separated from it by a barrier such as a major road, railway line or river and there is no existing or proposed pedestrian route which provides safe and convenient access to the centre.

As well as existing and proposed physical links between the site/proposals and the PSA, the degree of functional linkage between the two will have a major effect on the level of linked trips. People may be more willing to walk between an edge of centre site and the PSA if they each have strong, complementary attractions.”

The Saleground agents point out that the Saleground site offers accessibility by non-car travel, being next to the rail station and accessible by bus. That proposed development includes a layby for bus access with 4 bus stops and enables buses to turn using the mini-roundabout at the new site entrance. The development would also deliver other off-site
highway improvements (listed at paragraph 3.5) along Station Road and at the junctions in the vicinity. This represents an improvement over the current situation, although improvements would also be likely to be delivered by other forms of development on the site (for example the approved residential scheme 2009/0835/D provided circulatory bus access to the station through the site, 2 coach spaces and an additional 40 space car park). It should also be noted that the Postmill Close site is also well served by buses along Norwich Road and is closer to the greater bulk of Wymondham’s residential area to the north.

4.20 The agents also suggest that the site is on a desire line from the rail station to the Town Centre. While the Saleground site may be more accessible by train than the Postmill Close site, it does not necessarily follow that people visiting the proposed Station Road (Saleground) foodstore from the rail station are any more likely to extend their journey to visit the Town Centre than persons visiting the Postmill Close site. It should be noted that the Postmill Close site is close to a medical centre and to the Town’s Leisure Centre and Secondary School which can also be regarded as complementary attractions to the Town Centre.

4.21 The Saleground agents suggest that the pedestrian route over the junction at Harts Farm Road is not a barrier, but rather is a safe, regular, signalised crossing that assists pedestrians to access the Town Centre.

4.22 In contrast, it will be noted that the Council’s consultants GVA regard the presence of the London Road/ Harts Farm Road and the junction with Station Road as a barrier to shoppers contemplating visiting the Town Centre from both the Saleground and Ayton Road sites. This is echoed by agents for this application who also note that it is an up-hill walk from Station Road to the Town Centre. Sites should be located to encourage car borne and other shoppers at a proposed store to extend their shopping trip to the town centre. The Saleground site, however, would require pedestrians and cyclists to negotiate considerable physical barriers at the junction at Harts Farm Road. This road was designed as a major trunk road and so is visually very separate from surrounding uses. It contains wide highway splays, inactive space and few frontages and still carries traffic levels that are higher than most urban streets. The combination of these features creates severance of the urban fabric and public realm of Wymondham and distinct separation of uses to the south from the town centre and residential areas to the north. Sites to the south are, therefore, significantly disconnected from and their accessibility to the town centre constrained.

4.23 The Council’s Policy Team have also undertaken an assessment of the three sites and their findings are summarised in a table attached as Appendix 4.

4.24 Although the Ayton Road site is marginally the closest to the Town Centre, the London Road/ Harts Farm Road is similarly a barrier to the Town Centre and the bulk of the Town to the north, so its accessibility and connection to the Centre are compromised. Although informal contact has been made by would-be developers and it has been promoted in consultation comments for the Area Action Plan, no application for the site has been received and details of the site’s deliverability have not been fully explored. However, for the reasons set out above, neither the Saleground site nor the Ayton Road site have preference and do not conform with the NPPF.

4.25 The Postmill Close site, although slightly beyond the 300m distance regarded as the outer limit for an edge of centre location, is the site preferred by GVA and the Policy Team’s analysis. The site benefits from bus services running along Norwich Road and it also has the advantage of being more accessible to the bulk of the Town which lies to the north. A shopper at the proposed store could walk easily to the town centre in a few minutes through attractive residential streets, directly connected to shops and facilities. The current application for the site has shown that a revised vehicular access is possible from Harts
Farm Road which has the support of NCC Highways. Regardless of the merits of the particular application currently submitted on that site, I consider that the Postmill Close site (unlike the Saleground site) can be regarded as accessible and well connected to the Town Centre.

4.26 The agents for the Saleground site have raised a number of criticisms of the Postmill Close proposal which I would summarise and comment on as follows:

- The site lacks road frontage and visibility from Norwich Road.

4.27 While this may be a commercial consideration it could be overcome by appropriate signage. The agents have provided confirmation of retailer interest in the site. I do not consider this issue materially detracts from the planning merits of the site.

- The site is constrained and necessitates an ‘L’ shaped building.

4.28 This may be less convenient than a larger site, but planning authorities and developers should show flexibility in the adaptation of development proposals when applying the Sequential Approach. I do not regard this factor as fatal to the suitability of the site.

- The site has inadequate servicing including conflict between delivery vehicles and customer traffic.

4.29 The access from Postmill Close is shared by delivery and customer vehicles and the route to the service yard does pass through part of the customer car-park. While this may not be ideal, the Highway Authority has not objected to the scheme. It is not surprising that such a site within an established built up area, close to a town centre, will be constrained by limited space to some degree. I do not consider that the service arrangements justify refusal nor do they render the site unsuitable.

- Access arrangement involves land in different ownerships which raises doubt as to the availability and viability of the scheme.

4.30 No objections have been received from the other land owners to suggest their land would not be available. I do not consider that multiple site ownership is unusual for such an urban development site. I have no reason to believe that agreement could not be reached between the parties to deliver the site. A condition is recommended to ensure the off-site works are delivered with the development.

- Lack of pre-application public consultation/engagement and larger number of public objections to the Postmill Close application.

4.31 The applicant for the Postmill Close site did not arrange for pre-application public consultations, whereas the Saleground applicant undertook a range of measures including public exhibitions and feedback. While such community engagement is encouraged, it is not a statutory requirement. It is correct that there were far more objection letters to the Postmill Close application. The most common concern related to the traffic implications on Norwich Road which was partly addressed by a subsequent revision linking the access to Harts Farm Road. I do not consider that the quantity of objections, nor the lack of pre-application public engagement disqualifies the site from being preferred.

4.32 Taking all the above factors into account, I conclude that Postmill Close should be regarded as a preference site, whereas sites south of the London Road/Harts Farm Road junction should not, until such time as the disconnection and severance of Harts Farm Road is addressed. In these circumstances, and as there are no current proposals to remediate the separation issues of Harts Farm Road, approval of the Saleground, Station Road application would be contrary to the NPPF.
4.33 The original submission proposed vehicular access exclusively via Postmill Close onto Norwich Road. This raised objection from local people and the Highway Authority. The application was subsequently amended by the inclusion of third party land to provide an additional access route linking Postmill Close to Harts Farm Road. Although exclusive vehicular access by Harts Farm Road was favoured by some local residents, the creation of a through-route between Norwich Road and Harts Farm Road (via Postmill Close) has also raised concern among some who fear creation of a ‘rat-run’.

4.34 The Highway Authority approve of the proposed link and access proposals as now presented. I also regard the link as a useful connection in the local highway network. Postmill Close contains a Health Centre, Veterinary Centre and a number of industrial units. The new highway link would provide an access route for these facilities and other local destinations as an alternative to the more congested Norwich Road. Harts Farm Road contains few accesses and is less intensively used than Norwich Road which has considerable residential frontage development as well as the school, recreation centre and a number of other businesses.

4.35 The proposals still include a direct pedestrian access to Norwich Road, as well as retaining an access to the Scout and Guide hall. It will also be noted that the development would deliver a new pedestrian crossing on Harts Farm Road and new footway from Papillon Road.

4.36 I consider the highway aspects of the development to be acceptable and consistent with SNLP policy IMP8.

Residential Amenity

4.37 I would anticipate that the greatest threats to the amenities of nearby residents from a development of this nature would be from noise and increased lighting. Details of external lighting can be controlled by condition. There will clearly be noise from traffic visiting the site, including delivery vehicles. The Service Yard is located away from most residential properties adjoining the site, except for the dwelling Brathwayte. This dwelling sits within a large garden, however, and benefits from mature vegetation on earth bunding along the sides adjoining the application site. Conditions can be imposed to control the hours of vehicular activity.

4.38 Other residential properties adjoin the proposed car parking area and a condition to confirm boundary treatments, either retained or introduced, can reasonably be imposed. Recycling facilities can also be the source of significant noise, as can items of plant such as refrigeration and extraction equipment. Again, the location and details of these can be controlled by condition.

4.39 The agents for the Saleground site have suggested that the proximity of this site to residential property makes it less preferable to the Saleground proposal. Given that the current and last uses of the Postmill Close site include general industrial and a coach depot use, however, I do not consider that the proposed foodstore would result in any significant diminution of amenity for nearby residents. I also note that the Saleground proposal locates its service/ delivery yard directly opposite a row of 3 cottages on Cemetery Lane which undermines this claimed comparative advantage.

Design and Heritage Impact

4.40 There are no listed buildings affected by the development and, although the site adjoins the Wymondham Conservation Area, this stops at the residential properties on Norwich Road. The application site is set to the rear of these properties and has only limited frontage to Norwich Road. I consider that the development will have little direct impact on the character and appearance of the Conservation Area and, given its current derelict
appearance, any such impact is likely to be positive. Indirect impact from increased traffic may occur, but this should be mitigated by the vehicular access from Harts Farm Road and the attraction of retail activity back to the town will hopefully be of broader benefit to the prosperity and vitality of the area.

4.41 The building design incorporates materials consistent with local traditions and I consider its appearance to be acceptable in this location. Although the footprint of the building is large, the apparent scale is reduced by its elevational treatment and the two storey section is set towards the rear. I find the use of sloping pantiled roofs and exposed timber trusses and arcade posts along the front break up its visual mass and soften its appearance. The building will not be unduly prominent, but I consider its scale and appearance will be compatible with and complementary to its surroundings.

4.42 There is limited space for soft landscaping to soften the appearance of the car parking area, although the small frontage to Norwich Road does allow for planting areas that will enhance the street-scene and the approach to the Conservation Area. The site also benefits from a backdrop of mature vegetation associated with the property Brathwayte. Some trees will be lost to enable the development to proceed, although these are assessed as having low vitality due to lack of management and ivy cover. Proposals include replacement planting of a greater number of heavy standard trees to mitigate the impact of their loss.

4.43 Given the current poor appearance of the site and its context amongst commercial properties on Postmill Close, I consider the design of the development will be of good quality and a considerable improvement on the present situation.

Drainage

4.44 Anglian Water has confirmed that adequate capacity exists to provide foul drainage for the development. At the time of writing, however, there are still outstanding issues regarding the details of surface water drainage. The site itself is not at risk of flooding, but there are outstanding issues with regard to the details within the submitted Flood Risk Assessment and the degree of attenuation/storage required on the site to prevent overload of receiving sewers/watercourses. Negotiations are continuing with the Environment Agency, but I can see no reason why a technical solution cannot be found to sustainably manage surface water from the site. I hope to be able to update the meeting on this issue.

Sustainable Design

4.45 The application is supported by an Environmental Sustainability Statement claiming a range of advantages for the scheme such as its accessible location, potential recycling of demolition waste, use of efficient lighting and heating systems, and water conservation measures. Few precise details are given, however, and in terms of specific policy requirements for renewable energy generation, it is suggested that this would be decided at a later stage (either combined heat and power plant or air-source heat pump systems are suggested). I consider that the submitted information is not sufficient to demonstrate that opportunities to maximise sustainable design have been fully considered at this stage. I consider that a condition would need to be imposed requiring further details in respect of the construction, servicing and management of the building to ensure policy requirements are met.

Loss of employment

4.46 Agents for the Saleground site have criticised the Postmill Close proposal for resulting in the loss of employment land suitable for smaller businesses. Although the site is currently mostly vacant they claim it could have potential to generate 97 jobs. I do not consider that this can be given significant weight when comparing the sites, because the Saleground
site itself is allocated for employment use in the SNLP (WYM5), although permission has been given for its mixed residential and office development. Both proposals could also deliver employment in their own right (approximately 180 full time equivalent posts claimed in each case). Although one motor engineering business would be displaced, I consider that the mix of full-time and part-time employment likely to be provided by a foodstore would provide significant benefit to the local economy and community. This loss of employment land does not make the site unsuitable or less preferable than the Saleground site.

Deferral pending Inquiry

4.47 The agents for the Saleground site have suggested that, if Members feel unable to support their client's application, then a decision on this application (Postmill Close) should be deferred and the Council should enter the forthcoming appeal Inquiry on a neutral basis so that both proposals are considered by the Planning Inspectorate.

4.48 Although deferral is an option open to Members, as Local Planning Authority we are entitled to determine the Postmill Close application (subject to ‘call in’ procedure explained below) which, unlike the Saleground application is not the subject of an appeal against non-determination. The Council is similarly entitled to adopt a position in respect of the Saleground application, either for or against so that its position at the Inquiry is clear.

4.49 Members may wish to note that if they resolve to approve the Postmill Close application, then an approval cannot be issued until the application is referred to the Secretary of State so he can decide whether the application should be ‘called in’ for his own determination. This is required by The Town and Country Planning (Consultation)(England) Direction 2009 which applies to (amongst other things) retail development outside town centres where the floor space of the proposal exceeds 5,000 sqm either by itself or when added to other proposals within 1km which are the subject of an application not yet determined. The timing of the SoS’s response to such a referral cannot be predicted with certainty at this stage. However, I would assume that part of his consideration will be whether the Postmill Close application should be determined in isolation, or in co-ordination with the outcome of the non-determination appeal on the Saleground site. In these circumstances Members will note that the final decision on the timing of the determination of the two applications rests with the Secretary of State (unless this Committee resolves to refuse the Postmill Close application, which it could do without reference to the SoS).

5 Conclusion

5.1 I conclude that the proposed development meets the description of a preference site that is accessible and well connected to the town centre and is the only such site currently available and deliverable. This additional store alone would not have a significant adverse impact on the town centre. Subject to appropriate conditions, the proposal is consistent with national and local policies on the sequential test and retail impact considerations.

5.2 I find that the proposal is also acceptable in terms of the more detailed issues referred to above. Conditions are required to ensure the development takes place and operates in a manner that does not cause unacceptable harm and these are summarised at the head of the report.

(Note referral to Secretary of State para 4.7 above)

Contact Officer, Telephone Number and E-mail:
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Dear Mr Trett

FOODSTORE APPLICATIONS, WYMONDHAM

1. South Norfolk District Council has instructed GVA to review two separate foodstore applications in Wymondham. This work has been informed by discussions with Planning Officers, a detailed review of the application submission material and subsequent correspondence, and the recently completed Wymondham Retail Strategy (October 2012) prepared by GVA. We submitted our advice in a letter to the Council dated 24 October 2012. The applicants expressed concern that GVA did not appear to have been provided with all the relevant material submitted by them. Having now been provided with what we understand to be all the relevant information, we are instructed to update our previous letter. This letter supersedes and replaces our letter dated 24 October 2012.

2. Our assessment focuses on the retail policy issues arising, notably impact and the sequential approach, and follows the advice set out in the Governments Practice Guidance on Retail Need, Impact and the Sequential Approach, written by GVA. This document continues to accompany the more recent National Planning Policy Framework (NPPF).

National Planning Policy Framework (NPPF)

3. It is first important to understand the policy framework within which the applications must be considered. The NPPF was adopted in March 2012: it makes clear the Government’s commitment to securing economic growth in order to create jobs and prosperity and to ensure that the planning system does everything it can to support sustainable economic growth.

4. The NPPF requires Local Planning Authorities (LPAs) to adopt a positive approach to decision-taking and to apply a presumption in favour of sustainable development. For decision-taking this means that applications which accord with the development plan should be approved without delay and where the development plan is absent, silent or relevant policies are out of date, permission should be granted unless the adverse impacts of doing so would significantly outweigh the benefits of the development when assessed against the policies in the NPPF.
5. In terms of retail policies, the NPPF maintains the general thrust of PPS4. It advocates a ‘town centres first’ approach, and requires planning policies to positively promote competitive town centre environments and manage the growth of centres over the plan period.

6. As confirmed below, the application sites are located beyond the Primary Shopping Area, and are not ‘town centre’ for the purposes of retail policy as defined in the NPPF. The NPPF confirms (paragraph 24-26) that a sequential site and impact assessment is required in support of the proposals set out in the RA.

7. Paragraph 27 directs local authorities to refuse an application where it fails to satisfy the sequential approach, or is likely to have significant adverse impact on one or more of the factors listed under Paragraph 26, including:
   - The impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
   - The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made.

Proposals

8. Application Reference 2011/1821: ‘The Station Road Site’ is identified as being over 450 metres from the Primary Shopping Area and is therefore technically defined as out-of-centre. The proposals include a foodstore of 3,554 sq m gross, and a 208 space car park. There is no named operator, but we understand there is retailer interest for a site in Wymondham.

9. In terms of net sales floorspace, the submission material is incomplete, and if the Council were minded to grant planning consent, we recommend clarity is sought on this point. Paragraph 7.73 of the Planning and Retail Statement confirms that the proposed store would have a total net retail sales floorspace of 1,858 sq m and ‘the vast majority of [floorspace] would be used for the purposes of convenience goods sales’. The supplementary ‘Cumulative Impact Assessment’ submitted in June 2012 clarifies that 15% of the proposed store will be comprise comparison floorspace, but the actual net figures for convenience and comparison remains unclear. A gross floorspace of 3,554 sq m and a net floorspace of 1,858 sq m equates to a net/gross ratio of only 52%; as set out in our advice dated 28 February 2012, this figure seems low compared to modern foodstore formats achieving around 80%.

10. The site covers an area of approximately 1.5ha and is allocated for employment in the adopted Local Plan, and has since been promoted for residential and employment floorspace. The planning history for the site includes a series of approvals for housing and employment, and the site has since been included as a housing allocation (64 units) within the recent site allocation process. The consultants did, however, submit representations on behalf of the owner to promote the application site and the adjoining area for a mixed use development including a foodstore.

GVA.co.uk
11. Application Reference 2012/0154: "The Norwich Road Site" is identified as being 340 metres from the Primary Shopping Area and is therefore technically defined as out-of-centre based on the NPPF definition, although we note additional factors must be taken into consideration. The proposals include a foodstore with a floorspace of 3,720 sq m gross, net convenience goods floorspace of 1,500 sq m, and comparison goods floorspace of 522 sq m net. Again, there is no named operator. The proposals equate to a net/gross ratio of 54%, and like the Station Road proposals this seems low compared to modern foodstore formats achieving around 80%.

12. The site covers an area of around 1.2ha with frontages and accesses to both Norwich Road and Postmill Lane. We understand that the site is currently in employment use in the form of a coach yard, but is under occupied and part vacant. The Norwich Road site was not allocated in the adopted Local Plan (2003), and has not yet been put forward for an allocation in the approved AAP Site Assessment schedule. Like Station Road, the consultants have submitted representations with the aim of securing the sites allocation for future development to provide a new foodstore.

**Wymondham Retail Strategy, GVA, October 2012**

13. GVA recently completed the Wymondham Retail Strategy, October 2012. This piece of work sets out a comprehensive review of retailing needs within Wymondham town centre to inform the emerging Wymondham Area Action Plan (AAP), and establishes the extent of need for retail growth and the most appropriate strategy to achieve such growth. This letter should be read in conjunction with the Wymondham Retail Strategy which underpins our advice on the two foodstore proposals. The Strategy meets the retail requirements of the NPPF in planning for growth and change and will guide the future of retailing in Wymondham over the plan period.

14. The strategy identifies a qualitative need for additional convenience goods floorspace in Wymondham in the form of a foodstore based on identified leakage of trade to foodstores further afield. In terms of comparison goods, the GVA analysis concludes that there is no need for site allocations to accommodate such floorspace beyond the Primary Shopping Area and those sites already committed (1-9 Ayton Road) and vacant (Focus DIY, Ferrier Close).

15. The evidence based document identifies no physical opportunity to extend the Primary Shopping Area to incorporate a seamlessly integrated new foodstore development, and concluded that sites for foodstores in edge and out-of-centre locations must therefore be considered. This approach is consistent with the NPPF requirements, ensuring the Council allocates sufficient sites to meet the extent of need identified. The strategy emphasises that foodstore development will be reliant on the claw-back of trade from competing destinations, and that acceptable levels of floorspace must be tested on the option for the town centre is acceptable. A cumulative impact assessment was undertaken as part of our study in order to identify the acceptable level of retail growth without having a detrimental impact on Wymondham Primary Shopping Area.

16. The analysis demonstrates that Wymondham Town Centre could sustain the impact of one new foodstore beyond the Primary Shopping Area, but two foodstores beyond the Primary Shopping Area would lead to an unacceptable impact on the trading performance of Wymondham Town Centre. In this context, our analysis of sites identified that the Norwich Road site was the most sequentially preferable site, and the most consistent with an edge-of-centre definition. Given the live planning application we concluded this site to be available.

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17. The strategy added that if, for any reason, a need arises over the longer term, over and above the implementation of the Norwich Road site, the Aylton Road site would be the next preferable site in sequential terms (for foodstore development) when considering retail issues. In this context, the Station Road site is the least preferable of those considered, in sequential terms. Our commentary noted that this analysis is based on retail issues, and the Council must consider a wider matrix of planning considerations during the decision making process.

18. Within the framework of our evidence base and strategy for Wymondham, we recommend the Council approves the Norwich Road proposals (App Ref 2012/0154) and refuses the Station Road proposals (2011/1821).

Application Submission Material

19. Having advised the Council on the most robust strategy for Wymondham, we review here key elements of the retail submission material for both applications in order to understand and assess variations in methodology and outputs.

Impact

20. Both applicants have undertaken an impact assessment to test the impact of their foodstore proposal on Wymondham Town Centre. We have already concluded that Wymondham can accommodate one foodstore beyond the Primary Shopping Area, so notwithstanding the differences between the methodologies used, we concur with the conclusion of each applicant that their proposal – in isolation – would not have a detrimental impact on Wymondham Town Centre.

21. During pre-application discussions, both applicants also considered the cumulative impact of two foodstores in Wymondham beyond the Primary Shopping Area and concluded that this scenario would also not have a detrimental impact on Wymondham Town Centre. The supplementary work was submitted to the Council to be considered as part of the overall decision making process. We disagree with the view taken by both applicants in respect of cumulative impact, and set out our reasons below based on a detailed critique of their submissions and respective methodologies.

Norwich Road

22. In terms of our technical review it is apparent that the applicant has used over-optimistic growth rates for convenience goods expenditure, and has underestimated the turnover of the proposal by using a foodstore sales density of £10,959 per sq m net. The major foodstore operators are currently trading in excess of £12,000 per sq m net, with Asda reaching over £15,000 per sq m net. These assumptions have the effect of over-estimating the amount of expenditure available in the system and mitigating the impact of the development.

23. Table 13 of the cumulative impact assessment identifies where the proposed foodstore will obtain its turnover from across the catchment area, identifying the proportion of trade which will be diverted from existing stores and centres. We conclude that the assessment is flawed on the basis of unrealistic conclusions in respect of trade draw. They assume, for example, that the proposed foodstore will achieve 15% of turnover from the core Wymondham survey zone, but 26% from beyond the survey area (comprising Zones 1-5, plan attached). They assume that a second foodstore would achieve 35% of its trade from beyond the survey area, and 15% from
Wymondham’s core zone. Compared to current shopping patterns the existing Waitrose store achieves 78% of turnover from the core Wymondham survey zone, and 0% from beyond the survey area.

24. The effect of the assumptions made is to mitigate the impact arising over a wide geographical area, and to substantially underestimate trade diversion arising from foodstores in Wymondham Town Centre.

25. When assessing cumulative impact, the GVA Wymondham Retail Strategy has based trade draw assumptions from new foodstore development on local factors, the geographical topography, road networks and a fine grained detailed assessment of existing shopping patterns and the trade draw pattern of the existing out-of-centre Waitrose foodstore. The trade draw from each zone is underpinned by the detailed consideration of each of these issues. We consider a new store would need to secure a higher trade draw from the core Wymondham survey zone than the levels estimated, and a consequent requirement for greater market share uplift in this zone and higher trade diversion rates from town centre floorspace.

Station Road

26. The Station Road application makes similar over-estimates of expenditure growth, incorporating a blanket 0.7% growth rate, when Experian forecast variable figures of around minus 0.3% and 0.4% over the 2011/2011 period, followed by growth of around 0.5%. Again they under-estimate the turnover of the proposal, incorporating a sales density of £10,375 per sq m net; as discussed above major foodstore operators average around £12-15,000 per sq m net.

27. Like the Norwich Road proposals, the assumptions of trade draw are unrealistic and inconsistent with current shopping patterns. The applicant assumes the store will obtain only 20% of turnover from Wymondham’s core survey zone, but 30% from beyond the survey area. As set out above, we consider these to be unrealistic assumptions based on a number of different local factors and the current trade draw pattern of the existing out-of-centre Waitrose store. Again, the applicant has mitigated impact over a wider geographical area, and we conclude that the applicant has not satisfactorily demonstrated that two foodstores outside of the Primary Shopping Area would be acceptable in impact terms.

28. Consistent with our evidence based study, we conclude that neither applicant has demonstrated that the cumulative impact of two foodstores will be acceptable. We conclude that only one foodstore would be acceptable in impact terms, and two foodstore would have a significant impact on the performance of Wymondham Town Centre. Our reasons are set out in detail in the Wymondham Retail Strategy but we summarise them here.

29. Trade diversion from the town centre would be significant and question the continued financial viability of town centre convenience goods floorspace including Co-Op, one of the key town centre anchor stores. Although this foodstore has a smaller influence on main food shopping patterns than the out-of-centre foodstores, proportionately it plays a significant role in the performance of the town centre.

30. The Wymondham Retail Strategy demonstrates that ‘food shopping’ is one of the main reasons for visiting Wymondham Town Centre; it is also evident that people visit Wymondham most
frequently for food shopping, and less frequently for non-food goods and service retailers. Other businesses in the town undoubtedly benefit from linked trips, and the erosion of a food shopping role in Wymondham would have a detrimental impact on its vitality. Initiating a gradual decline in footfall and possibly also the number, range and quality of businesses present over time.

31. New modern out-of-centre foodstores would offer ease of access, plentiful and free parking and a mix of non-food goods. Whilst we identify a need for a new foodstore in Wymondham as a consequence of unsustainable travelling to foodstores elsewhere in the catchment – notably Harford Bridge and Costessey – we conclude that Wymondham would detrimentally suffer from more than one new foodstore outside the Primary Shopping Area.

32. In this context, we consider that individually, each application would be acceptable in impact terms, but two new foodstores would be likely to have a significant adverse impact. The decision, in retail terms, must therefore be based on the sequential test, and we discuss this policy point below.

**Sequential Approach**

33. As clarified in the Wymondham Retail Strategy, the three key sites in order of preference, when considering retail policy issues only, include the Norwich Road site, the Aylton Road site and finally the Station Road site. The Norwich Road site is available and better linked to the Primary Shopping Area; as such it is more consistent with an edge-of-centre definition. The NPPF clearly states that when considering edge and out-of-centre proposals, preference should be given to accessible sites that are well connected to the town centre. We conclude that the Norwich Road site is the sequentially preferable site in Wymondham for a new foodstore, and there is no evidence to suggest that it should be dismissed on the grounds of suitability or availability (NPPF, paragraph 24).

34. The Station Road submission material, prepared by DPP, assesses three sites: the Wymondham Town Football Club, the Aylton Road site and the Norwich Road site. The Wymondham Town Football Club is no longer available, and should therefore be dismissed. The Wymondham Retail Strategy concluded that the Norwich Road site is the sequentially preferable site in Wymondham; most consistent with an edge-of-centre definition; the Aylton Road site is identified as being the second most sequentially preferable site. DPP has contested this conclusion.

35. The applicant concludes that in retail policy terms the three sites are ‘out-of-centre’, but acknowledge that it is necessary to consider the accessibility of each site to the town centre in determining whether it is sequentially preferable. Having completed this exercise as part of the Wymondham Retail Strategy, we conclude that the Norwich Road and Aylton Road sites are in more accessible locations to the Primary Shopping Area than the Station Road site which is further in distance. This conclusion is consistent with the NPPF which states that preference should be given to accessible sites that are well connected to the town centre.

36. The Norwich Road and Aylton Road sites are sequentially preferable to the Station Road site in terms of location, although we do acknowledge that sites must also be assessed against the full range of criteria set out in the NPPF, notably suitability and availability. Viability is no longer referred to directly, although we acknowledge that this may be related to the suitability and availability of a site.
37. The applicant cites a number of reasons for dismissing the Aylton Road site. They conclude that i) the principle of retail would be unacceptable due to the current employment uses, ii) the site is not available due to the current planning consent/commitment, iii) the site is unsuitable due to its location on the junction of Aylton Road and Station Road, and iv) linkages with the town centre are constrained by the B1172. The Council must consider the wider planning comments raised, but in retail terms we do not consider these are sound arguments to dismiss the site, although we do acknowledge that there are questions over its availability. We note that the applicant highlights that the B1172 is a barrier to connectivity with the town centre, an issue relevant to both the Station Road and Aylton Road site, but not the Norwich Road site.

38. DPP assesses the Norwich Road site in two supplementary documents (January 2012 and May 2012). They state that the site is not suitable due to the adjoining Conservation Area, the presence of two dwellings within the site boundary, accessibility to the site, transport implications and residential amenity. We acknowledge that these are relevant considerations for the Council to take into account when considering the wider planning suitability of this site. However, based on our discussions with the Council we understand that none form a reason for refusal. Again, while outside our terms of reference, we have received confirmation that accessibility and highways in particular have been resolved with the County Council.

39. In their submission material, DPP argue that the Norwich Road site is not viable as a consequence of highway costs and operator demand. The applicants' consultants, GL Hearn and RGP, prepared and submitted reports on both issues. It is our view that the Norwich Road site has a live planning application, submitted at considerable cost to the applicant through the appointment of a full professional team, and it is unlikely that the scheme would be viable. The Practice Guidance endorses this viewpoint, and states in paragraph 6.49 that 'where alternative sites are being actively promoted for new development by a developer/retailer, this is a reasonable indicator that the location is viable'.

40. In terms of operator demand, both the Norwich Road and Station Road applicants have submitted evidence of foodstore operator interest for their site and we do not, therefore, consider the Norwich Road site viable for this reason. Even if this were not the case, the Practice Guidance states that 'the fact that a specific retailer or occupier is said to be unwilling to locate on a particular site is not necessarily evidence that it is viable...[and]...case studies demonstrate retailers and developers' ability to be flexible and innovative in order to secure representation'. In terms of availability, DPP note (January 2012) that an application for the redevelopment of the Norwich Road site is being prepared and they conclude that the site is therefore available.

41. DPP state that the Station Road site is more suitable than the Norwich Road site as a consequence of its location close to the railway station. Policy does encourage locations that are readily accessible by alternative means of transport, but in this case we do not believe this provides the Station Road site with preference over the Norwich Road site in sequential terms. The GVA Wymondham Retail Strategy identifies that only 1% (In-Centre Survey) of visitors travels to Wymondham Town Centre by train thus demonstrating the limited opportunities for linked trips. It is widely acknowledged nationally that people rarely undertake main food shopping trips in modes of transport other than the car, and travel by bus, train and bicycle are associated with a smaller food shop limited by the number of bags that could be carried. It is unlikely that a main foodstore destination would benefit substantially from being in close proximity to a railway station.

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42. DPP themselves note that both the Norwich Road site and the Station Road site are on routes served by regular bus services into Wymondham town centre. On balance, we consider Norwich Road is more policy compliant in terms of location and linkages with the town centre, and while it is a relevant factor, we do not consider that the proximity of the Station Road site compensates for its distance and poor linkages and severance from the Primary Shopping Area.

Conclusion

43. We conclude that there is a need for one new foodstore in Wymondham, and that this cannot be accommodated in the Primary Shopping Area. Our assessment of impact demonstrates that two foodstores would have a detrimental effect on Wymondham Town Centre, and our review of the application submission material has not changed this viewpoint. Both applications pass the impact test when considering, in isolation, the implications of their own proposal, i.e. the impact of one foodstore.

44. We conclude that the Norwich Road site is the sequentially preferable site in Wymondham and for that reason, on retail grounds, the Norwich Road application (Ref: 2012/0154) should be granted planning consent. The Station Road site is the least sequentially preferable site after Norwich Road and Aylton Road, and on that basis, on retail policy grounds, would justify refusal on sequential grounds. These conclusions are based on retail issues, and we understand that the Council must take into account a range of wider planning considerations.

45. If consent is granted, we advise the Council to carefully consider the wording of conditions to restrict the amount of net convenience and comparison goods floorspace. We also recommend restricting the new foodstore from including a pharmacy which currently performs a key town centre business and visitor attraction.

46. I trust this sets out our position clearly, but please do not hesitate to contact me should you require clarification on any matters.

Yours sincerely

[Signature]

CAROLINE MARGINSON
Associate
For and On Behalf of GVA Grimley Ltd

gva.co.uk
Supermarket Provision in Wymondham – Policy Response

Introduction

The National Planning Policy Framework
The National Planning Policy Framework (NPPF) was published in March 2012 and replaces previous retail planning guidance contained in Planning Policy Statement (PPS) 4: Planning for Sustainable Economic Growth (2009). Retail planning advice is contained within paragraphs 23 – 27 of the NPPF.

Ensuring the vitality of town centres
The NPPF is very much focussed on the positive promotion of competitive town centres and states that local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. Applications for main town centre uses should be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals the NPPF states that preference should be given to accessible sites that are well connected to the town centre.

The NPPF also states that when assessing applications for retail, leisure and office development outside town centres, which are not in accordance with an up to date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set threshold or a default threshold of 2,500 sq m. South Norfolk Local Plan policy SHO 2 sets a local threshold of 1000 sq m (net), which should be applied in this instance. Any assessment should include the impact of the proposal on centres in the catchment area of the proposal and the impact of the proposal on town centre vitality and viability up to 5 years from the time the application is made or 10 years in the case of major schemes.

If an application fails to satisfy the sequential test or is likely to have a significant adverse impact it should be refused.

Promoting sustainable transport
The NPPF recognises that transport policies have an important role to play in facilitating sustainable development. Encouragement should be given to applications which support reductions in greenhouse gases and reduce congestion. All developments that generate a significant amount of movement should be supported by a Transport Statement or Transport Assessment.

Promoting healthy communities
Of particular relevance to the Kings Head Meadow site the NPPF states that open space, sports and recreational buildings and land, including playing fields should not be built on unless as assessment has been undertaken which shows the land or buildings to be surplus to requirements, the loss resulting from the development would be replaced by equivalent or better
provision or the development is for alternative sports and recreational provision the need for which outweighs the loss.

**Evaluation of sites**
Following discussion with the Case Officer it was decided that the best approach to be taken would be to make a comparative assessment of the four potential sites in the frame. This enables a Policy recommendation to be made about a favoured site. The assessment is shown below:

<table>
<thead>
<tr>
<th>Site Issue</th>
<th>Kings Head Meadow</th>
<th>Postmill Close /Semmence Yard</th>
<th>Saleground site, Station Road</th>
<th>Ayton Road</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sequential Assessment</td>
<td>Edge of centre – most sequentially preferable site</td>
<td>Edge of centre – most sequentially preferable of the available sites</td>
<td>Out of centre – least sequentially preferable of the available sites</td>
<td>Out of centre</td>
</tr>
<tr>
<td>Brownfield/Greenfield</td>
<td>Greenfield</td>
<td>Brownfield</td>
<td>Brownfield</td>
<td>Brownfield</td>
</tr>
<tr>
<td>Accessibility</td>
<td>Closest to town centre Potential access difficulties on Norwich Road</td>
<td>No major barriers to accessing town centre Potential access difficulties on Norwich Road Possibility to access from Harts Farm Road Close to main residential population of north Wymondham, potential for linked trips and access by foot rather than car</td>
<td>Close proximity to rail station B1172 road forms barrier to accessibility from town centre</td>
<td>Close proximity to rail station B1172 road forms barrier to accessibility from town centre</td>
</tr>
<tr>
<td>Availability</td>
<td>Town Council have indicated that site is not available in the short term No planning application.</td>
<td>Planning application 2012/0154/F</td>
<td>Planning application 2011/1821/F</td>
<td>Put forward for LDF so potentially available – no planning application.</td>
</tr>
<tr>
<td>Deliverability</td>
<td>Site not deliverable in the short term</td>
<td>Site likely to be deliverable</td>
<td>Site likely to be deliverable</td>
<td>Uncertainty about deliverability in short term as units are currently in use</td>
</tr>
<tr>
<td>Other considerations</td>
<td>Loss of open space</td>
<td>Loss of employment site</td>
<td>Allocated in SNLP for</td>
<td>Loss of employment site</td>
</tr>
</tbody>
</table>
Need to relocate recreational facilities to a new bespoke facility (not more intensive use of existing) Public opposition to site | employment use Site forms gateway to Wymondham from railway station | Units currently in use

Results of Wymondham Area Action Plan survey
The Council are currently in the early stages of preparing an Area Action Plan for Wymondham. A public consultation took place between 23 January and 16 March 2012 and a questionnaire was sent to every household and business in the Parish of Wymondham. The questionnaire asked ‘Do you think Wymondham needs a new supermarket?’ A clear majority of respondents (72%) said yes, Wymondham did need a new supermarket.

The question also asked where the best place was for a new supermarket to be located. This question was deliberately open ended as it was considered important not to influence people’s answers. The responses received to this question indicated broad support for an out of town location over a town centre supermarket and support for the use of brownfield site over greenfield.

In terms of location there was public support was for the Saleground site near the railway station, followed by re-use of the empty Focus store, then the Semmence site. There was some limited public support for Kings Head Meadow but this was outweighed by the number of people who said there should not be a supermarket on Kings Head Meadow.

One or two supermarkets
There is an issue about whether Wymondham could support more than one new supermarket. Advice from GVA is that they are not convinced that there would be the demand to support more than one new supermarket in the town. An applicant would need to provide evidence about the cumulative impact of more than one food store.

Conclusion
An assessment of the four potential supermarket sites indicates that two sites (Kings Head Meadow and Ayton Road) are not currently available and/or deliverable and therefore should not be included as part of the sequential assessment at this stage. Therefore the remaining two sites to be considered are the old Saleground site and the Semmence yard, both of which are subject to planning applications.

The Policy team would require an impact assessment for any major supermarket proposal in Wymondham and providing that any such assessment was considered to be sustainable Policy advice would be to recommend approval for the most sequentially preferable of the two sites e.g.
the Semmence Yard. This is an edge of centre rather than out of centre site and is more accessible and well connected to the town centre as it is not separated from it by the B1172, which can be viewed as a barrier to connectivity and accessibility. If the Semmence Yard site were to be approved preference would be for an access from Harts Farm Road or some kind of one way system to overcome traffic problems in Norwich Road. The Semmence Yard site is closer to the main built up area of north Wymondham than the other sites, which may encourage linked trips e.g. with the school run or visit to services and facilities in the town centre. It could also give people an opportunity to walk rather than using their cars.

If the Semmence Yard site were to be approved then the applicant for any other supermarket proposal would need to provide information about the cumulative impact of more than one supermarket in the town to argue the case for a second store.

If any application is approved a condition would also be needed to control what goods could be sold, so as not to have an unacceptable impact on the town centre.

Carole Baker
Senior Planning Officer
Planning Policy Team

Update

Since this note was produced there has been considerable work done on the Wymondham Area Action Plan which has some bearing on the comments.

The first point to note is that King's Head Meadow can no longer be considered to be available and therefore is not included in this comparison.

We have also evaluated the employment and housing sites and Cabinet consider the site assessments on the 16th July. This consideration led to agreeing the preferred options for housing and employment sites.

Since the 16th July our work has focussed on other aspects of the AAP and of particular relevance is the work on retail, town centre expansion and transport (including pedestrian and cycle links from the proposed growth locations and the town). This work is ongoing, but does include evaluating options for town centre expansion (as set out in Policy 10 of the Joint Core Strategy). The nature of this expansion could well have a bearing on the suitability of the three sites we know are available. For example, it may alter the previous assessment on proximity to the town centre. In transport terms, the links from the proposed housing sites to the south of the town, including pedestrian links, are being examined. The situation mentioned in earlier comments may well figure as proposals to overcome perceived barriers.
We have also commissioned a retail study, which will assess the capacity for retail and establish whether there is justification for allocating land for retail use. The consultants commissioned are also advising us on the definition of the town centre, and its potential for expansion. This work will be reported in early October and is crucial evidence for the Council in its assessment of future need and how best to address it through site allocation and policies that frame other associated works.

So in conclusion, the above work mention work needs to be taken into account as emerging policy.

Tim Horspole – Head of Localism and Growth


Since the previous update work has been continuing on the Wymondham Area Action Plan (AAP). The AAP Preferred Options document and Interim Sustainability Appraisal Report are being considered at Cabinet on Monday 29th October. Provided the documents are agreed at this meeting then it is our intention to go out to public consultation late 2012/early 2013.

As part of the Preferred Options document preparation we have looked at retail provision in Wymondham, in particular defining the town centre, justification for town centre expansion as stated in the Joint Core Strategy and the most sequentially preferable site for the provision of a new supermarket in the town. We have commissioned a retail study to look into these issues. At the time of writing the final study has not been signed off but the headline recommendations, which have been reflected in the AAP, include:

- No justification for changing the Primary Shopping area or extending the town centre boundary
- There is a need for an additional foodstore in Wymondham, which should be situated in the most preferable edge or out of centre location
- Of the 3 sites considered the retail study concludes that Norwich Road/Postmill Close is the most sequentially preferable site based on current physical and commercial circumstances. The B1172 Harts Farm Road is seen as barrier to development of the other sites at Ayton Road and Station Road.

Based on the recommendations of the retail study the AAP Preferred Options document to be considered at the Cabinet meeting on 29th October is proposing the following:

- The town centre should remain as defined in the 2003 adopted South Norfolk Local Plan with the Central Business Area being renamed as the town centre boundary. The AAP is not proposing any extension to the town centre based on the evidence in the retail study.
- New retail development and main town centre uses to be encouraged within the town centre boundary. A sequential approach to be applied when considering main town centre uses outside the town centre
boundary with preference given to accessible site that are well connected to the town centre for pedestrians. The AAP proposes a policy to set thresholds for sequential and impact assessments

- A new foodstore is needed in Wymondham. The AAP document considers 3 sites (Norwich Road/Postmill Close, Ayton Road and Station Road) and a full assessment of each site is included as part of the Interim Sustainability Report. The AAP recognises that all 3 sites are out of centre and concludes that the Norwich Road/Postmill Close site is currently the most sequentially preferable site for a new supermarket because of its proximity and links to the Primary Shopping Area, its accessibility for pedestrians and cyclists and its potential to generate linked trips.

In conclusion although it is acknowledged that the AAP can carry limited weight when making planning decisions at the moment it should be taken into account as emerging policy.

Carole Baker
Senior Planning Officer