



Charles Colling
Norfolk County Council

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Your Ref: FUL/2023/0019
Date: 9 August 2023

My Ref: 0/FUL/23/0019
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Email: jonathan.hanner@norfolk.gov.uk

Dear Charles

**Besthorpe: Proposed Aggregate and Soil Recovery Facility (Part Retrospective)
Newall Plant Limited, Heron Farm, Bunwell Road, Besthorpe, NR17 2LN**

Thank you for consulting the Highway Authority with regard to the above planning application.

As you will be aware, there has previously been extensive planning history at this site and we have previously provided comment with regard to a similar proposals.

During the last application FUL/2020/0062, which was refused by your Authority in November 2021, we confirmed that we would not be able to substantiate an objection to the proposals subject to a number of conditions.

It is noted that a further permission has been granted at the site, by Breckland District Council (pp 3PL/2022/0190/F) in 2022, which permitted use for the continued storage of plant, materials and aggregates at the site.

Having considered the latest proposals submitted, it is noted that in terms of highway considerations the current proposals offer no change and as such our previous stance remains.

I note that, as with FUL/2020/0062, whilst a section within the Planning Statement outlining the likely associated traffic generation has been submitted there is no specific Transport Statement. It would have been beneficial if, as previously requested, a detailed assessment outlining the existing permitted traffic generation alongside the proposed traffic generation (in the form of an updated TS or detailed section within the PS) were provided.

For the avoidance however I have reiterated our previous comments below:

Existing Site

The site is situated directly off the C139 Bunwell Road with vehicular links (a distance of under 2.5 miles) back to the strategic road network gained via the C140 Bunwell Road / Station Road and directly onto the A11 trunk road.

Given the existing operations at the site (including a Civil Engineering operation with a haulage fleet and associated storage of plant, materials and aggregates) HGV movements are already generated to / from the site along this route.

Proposals

It is noted from the information submitted, that the applicant is seeking permission to process up to 60,000 tonnes of waste per annum on the site. The applicant has outlined that based upon a worst case scenario this will equate to on average approximately 22 additional movements (11 in / 11 out) importing waste per day and a further 22 additional movements (11 in / 11 out) exporting the processed material per day.

It should however be noted that, this is the worst case scenario and in reality there is likely to be some efficiencies of HGV trips gained and therefore it is not necessarily the case that all of these movements will be new to the network.

HGVs exporting processed materials will likely import unprocessed material on the return journey to site (when possible). Also the haulage fleet (associated with the existing permitted uses on the site) are already stored on the site and it is reasonable to assume that some vehicles leaving / returning to the site at the beginning / end of the day will be utilised to carry material.

Surrounding Highway Network

Having assessed the route to / from the site, whilst I appreciate it runs through the village of Spooner Row, I am satisfied that the C140 Bunwell Road / Station Road is technically capable (by virtue of its width and alignment) to cater for the increase in HGV movements outlined.

The section of the C139 Bunwell Road leading from the site back (eastwards) to the C140 junction is narrower and I had previously outlined the need for improvement. It should however be noted that, as part of pp 3PL/2018/1262/F, the applicant provided some localised road widening in to address these concerns and provide formal areas to allow two large vehicles to pass.

This section of the rural road network does not benefit from any formal pedestrian facilities, and as such pedestrians (as is typical with large parts of the network) are required to walk in the live carriageway. The road however is flanked by a predominantly flat grass verge (on both sides), which offers pedestrians safe refuge should they require it when vehicles pass.

Given the above, coupled with the existing permitted HGV movements already on the road, and the predicted additional HGV flow we would be unable to substantiate a severe highway safety objection to the proposals on this point.

Vehicle Routing

I note from the information submitted that all HGVs associated with the proposed development will access / leave the site via Bunwell Road, Station Road and the A11 (turning right out / left in only) which I understand is currently a voluntary arrangement the site currently operates. In fact there is currently a sign erected at the existing access to inform drivers to turn right when leaving the site

Given the significant shortcomings of Bunwell Road to the west of the site (by virtue of its narrow nature / winding bends) and the fact that forward visibility of right turning vehicles is significantly restricted I believe this to be a sensible approach.

As previously advised however, the applicant will need to submit and agree a HGV management plan enter (secured by condition) to formalise this and ensure that this is the case, with appropriate management mechanisms put in place to monitor / enforce this arrangement.

Vehicular Access

I previously requested that the applicant provides "give way" and associated carriageway edge road markings at the existing access. By providing road markings it better helps delineate the edge of the carriageway and the associated give way line which will optimise visibility for vehicles leaving the site.

You will be aware from my previous response, in relation to FUL/2020/0062, that this has been provided on the ground, albeit it had started to fade, and that this has addressed our previous concerns. It would however be beneficial if the applicant refreshes these, if they haven't done so in the interim.

Photo of existing vehicular access off Bunwell Road

Given the nature of the on-site access roads (which I understand are concrete leading onto Bunwell Road) a formal wheel washing facility may not be required. I would however request that, as a minimum, a suitably worded condition is imposed to ensure that appropriate measures are in place to ensure material is not deposited onto the highway and to allow enforcement action to be taken if required..

I would suggest that a suitably worded condition is imposed on any consent notice issued which restricts the through put of material to the 60,000 tonnes per annum level proposed.

In light of the above, I can confirm that the highway authority does not feel that a severe highway related objection could be substantiated with regard to the above planning application.

Should you be minded to approve the application, I would be grateful if you would include the following condition (in addition to the wheel cleaning & through put cap suggested in the body of the letter):

SHC 25

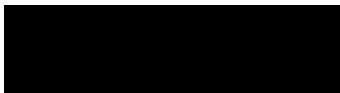
The Applicant shall submit to the Local Planning Authority, a HGV Management

Plan for the routing of HGVs to and from the site. The Plan shall thereafter be implemented as approved before any operations commence on the site. The Plan shall make provision for: -

- Monitoring of the approved arrangements during the life of the site.
- Ensuring that all drivers of vehicles under the control of the Applicant are made aware of the approved arrangements.
- The disciplinary steps that will be exercised in the event of a default.
- Appropriate signage, details to be approved by the Local Highway Authority and erected advising drivers of the vehicle routes agreed with the Local Highway Authority.

Reason: In the interests of maintaining highway efficiency and safety

Yours sincerely



Principal Engineer - Developer Services
for Executive Director for Community and Environmental Services

Please be aware it is the applicants responsibility to clarify the boundary with the public highway. Private structures such as fences or walls will not be permitted on highway land. The highway boundary may not match the applicants title plan. Please contact the highway research team at highway.boundaries@norfolk.gov.uk for further details.