

**Policy W07/1 – Land Adjacent Holkham Road
(AKA Land at Mill Road, Wells-next-the-Sea)**

Pre-Application Submission and Advice

Contents

- 1. Covering Letter, Armstrong Rigg Planning, 23rd March 2023**
- 2. Location Plan, Holkham**
- 3. Original Site Layout, Feilden+Mawson, March 2023**
- 4. LVIA – Initial Appraisal: Key Landscape and Visual Receptors, The Landscape Partnership, 10th February 2023**
- 5. Revised Submission Covering Letter, Armstrong Rigg Planning, 12th October 2023**
- 6. Revised Site Layout, Feilden+Mawson, 11th October 2023**
- 7. Sketch Landscape Strategy, The Landscape Partnership, October 2023**
- 8. Pre-Application Advice, North Norfolk District Council, 4th April 2023**

1. Covering Letter, Armstrong Rigg Planning, 23rd March 2023

Ref: GA/DJ/04022/L0001

23rd March 2023

Sent by email to planning@north-norfolk.gov.uk

Pre-application Advice Service
North Norfolk District Council
Holt Road
Cromer
Norfolk
NR27 9EN

Dear Sir / Madam

**Request for Pre-Application Advice
Proposed Full Planning Application for 51 Dwellings
Land at Mill Road, Wells-next-the-Sea**

On behalf of our client, the Holkham Estate, I am writing to request formal pre-application planning advice in respect of a proposed full planning application for the erection of 51 dwellings at Land at Mill Road, Wells-next-the-Sea.

The site is an **emerging allocation at Policy W07/1** of the new Local Plan. It is sustainably located on the edge of Wells-next-the-Sea and its development would serve to sensitively round off the area between properties fronting Mill Road to the south and Westfield Avenue to the east. The proposed development has been designed to accord with the emerging allocation and would deliver an innovative housing tenure mix that both accords with adopted policy and would help meet the critical need for rental accommodation in the local area. Our client describes this proposed mix as Policy Plus Plus. In summary, in addition to providing a mixture of dwellings for private sale, social rent and First Homes, the proposal would deliver properties at affordable rent levels to key workers and properties for private rent.

Enclosed with this letter are the following plans and documents and the required fee of £6,036 will be paid over the phone:

Title	Author
Forms	
Pre-Application Enquiry Form	Armstrong Rigg Planning
Plans	
Location Plan	Armstrong Rigg Planning
Site Layout and Plot Schedule	Feilden+Mawson

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Illustrative House Types and Materials (taken from recent Holkham Estate scheme for illustrative purposes only)	Feilden+Mawson
Reports	
Archaeological Desk-Based Assessment	RPS
Ecological Assessment	Hopkins Ecology
Flood Risk and Drainage Strategy	Ingent Consulting Engineers
Housing Needs Assessment	Housing Vision
Landscape and Visual Impact Assessment	The Landscape Partnership
Preliminary Heritage Review	JB Heritage Consulting
Representations to Emerging Neighbourhood Plan Policy WNS4: Principal Residence Dwellings	Armstrong Rigg Planning
Transport Scoping Note	KMC Transport Planning
Tree Survey and Tree Constraints Plan	Ravencroft Arboricultural Services

This letter provides a background to the Holkham Estate before describing the site, relevant planning policy and the proposed development. It then sets out a planning assessment of the proposals focussing on the design of the layout and the proposed housing mix. As part of this pre-application request we would welcome a meeting with planning and housing officers to discuss the proposals.

The Holkham Estate

The Holkham Estate's vision is to be the UK's most pioneering and sustainable rural estate. This vision is embodied in five ambitions: to enhance and revitalise the estate's important historic buildings and collections; to sustainably manage their landscape, farmland, habitats and wildlife; to create welcoming experiences to attract, inform and inspire those who visit or stay at the estate; to be a great place to work where talent is developed; and to be a force for good in helping local communities to thrive by providing employment, homes and support for local businesses and charities.

It is this final ambition that relates to the current pre-application advice request. The Holkham Estate is a significant local employer and is keenly aware of the difficulty local people face in finding affordable accommodation in one of the most sought after locations to live and visit in the country. The estate owns, lets and manages around 300 residential properties in 12 villages along the north Norfolk coast and is investing in the creation of new homes to help support local communities. Their focus is on creating high quality, sustainable homes that they can be proud of and that will last for generations. With this in mind, the estate commissioned an independent Housing Needs Assessment (HNA) in 2021 (**enclosed**) which identifies 4 key issues with the existing housing mix in Wells-next-the-Sea: (i) a diminishing private rental sector; (ii) a need for more affordable rental stock; (iii) the under-occupancy of larger dwellings; and (iv) a lack of affordable home ownership products. As set out in further detail below, the proposed Policy Plus Plus approach has been developed to help resolve the issues identified in the HNA.

Site Description

The site comprises approximately 3.6 hectares of greenfield land located to the west of Wells-next-the-Sea as shown on the aerial photo below. It is located to the north of Mill Road, west of Westfield Avenue and Bases Lane, south of Holkham Road and east of farm buildings and land associated with Mill Farm.

The site is comprised of 3 main parts: a central area to the rear of properties fronting Mill Road and Westfield Avenue that is proposed for residential development; a south-western area through which vehicular access is

proposed to Mill Road, but no other development; and a north-eastern area which is proposed to provide public open space and pedestrian and cycle connections to Holkham Road and Bases Lane. The central part of the site is well contained in the landscape with views to the south and east screened by existing development and views to the west filtered by trees along the former railway line and Mill Farm. The northern boundary of this part of the site is more open, but there is a large open. The north-eastern and south-western parts of the site are more visually prominent given their closer proximity to Holkham Road and Mill Road, but these areas are proposed to remain open.

The site is in Flood Zone 1 (low risk) and is unconstrained by environmental or heritage designations with the exception of its location within the Norfolk Coasts Area of Outstanding Natural Beauty (AONB) which washes over Wells-next-the-Sea. The site is also outside of the catchment area for the Broads Special Area of Conservation (SAC) and the River Wensum SAC and is therefore not affected by Nutrient Neutrality.



Figure 1. Aerial Photo

Planning Policy

Adopted Policy

National Policy is contained in the National Planning Policy Framework (NPPF, 2021) and Planning Practice Guidance (PPG). The development plan comprises the **Core Strategy (CS, 2008)** and the **Site Allocations Plan (SAP, 2011)**. The Core Strategy identifies Wells as one of four Secondary Settlements (Policy SS1) and allocates it 100-150 new dwellings between 2001-2021 (Policy SS3).

Emerging Local Plan

The Council are currently preparing a **new Local Plan** which reached **Proposed Submission (Reg. 19)** stage in January 2022 before being paused as a result of Nutrient Neutrality issues affecting protected habitat sites in

the Norfolk Broads and River Wensum. Wells is identified as a Small Growth Town in the emerging Local Plan (Policy SS1) and the site is proposed to be allocated for approximately 50 dwellings by Policy W07/1 (copied below). We understand that the Council are proposing to submit the plan for examination in Spring 2023 in preparation for which they have published several main modifications. These modifications confirm that Policy W07/1 remains a proposed allocation, with an important change proposed to the policies map to include land required for the site access from Mill Road within the allocation boundary (n.b. it is expected that the site area of 2.6ha included in the policy wording will also require updating).

Policy W07/1

Land Adjacent Holkham Road

Land amounting to 2.6 hectares, as defined on the Policies Map, is allocated for residential development of approximately 50 dwellings, 0.6 hectares public open space, and associated on and off-site infrastructure.

Planning permission will be granted subject to compliance with the policies of this Plan, and the following site specific requirements:

1. Delivery of high quality design that pays careful attention to site layout, building heights and materials in order to minimise the visual impact of the development on the Norfolk Coast AONB and long distance wider landscape views;
2. Provision of 0.6 ha of high quality public open space including facilities for play & informal recreation;
3. Provision of convenient and safe vehicular access to the site from Mill Road;
4. Retention and enhancement of mature hedgerows and trees around the site boundaries including provision of landscaping along the northern and eastern boundaries;
5. Provision of cycle and step free pedestrian access from Mill Road through the site and public open space to both Bases Lane and Holkham Road, including footway improvements to a minimum width of 2.0m between the Holkham Road pedestrian and cycle access and the boundary of the property known as 4 Laylands Yard;
6. Submission, approval and implementation of a Surface Water Management Plan ensuring that there is no adverse effects on European sites and greenfield run off rates are not increased;
7. Submission, approval and implementation of a Foul Water Drainage Strategy including details of any off-site mains water reinforcement, enhancements and setting out how additional foul flows will be accommodated within the foul sewerage network;
8. Delivery of a scheme that pays careful attention to design and landscaping to minimise any potential impacts on Holkham Hall Registered Park and Garden (Grade I) to the south and west of the site, and to the Wells Conservation Area directly adjacent to the north east and east of the site; and,
9. Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS)

The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.

Emerging Neighbourhood Plan

Wells Town Council are currently preparing a Neighbourhood Development Plan (NDP) with a Regulation 14 pre-submission consultation held in mid-late 2022. The initial draft of the NDP recognises the emerging allocation of our client's site. It also proposes a Principal Residence Policy (Policy WNS4) that would prevent all new homes in the town from being used as second homes or holidays lets. Whilst our client understands and acknowledges the

feeling locally about the increase in second homes, which one assumes drives the desire to have such a policy, it remains vitally important that there is an understanding and an appreciation of the significant consequences this policy may have.

The Holkham Estate submitted representations (see **enclosed**) to the NDP consultation strongly objecting to Policy WNS4 as they do not consider that this mechanism will be effective. These representations drew on the findings of the recent Councillor Call for Action (CCfA) 'Impact of Second Homes and Holiday Lets Data Report' that was first reported to the North Norfolk Overview and Scrutiny Committee on 20th July 2022 and was reported to Cabinet on 6th September 2022 and again on 3rd October 2022 which signed off its findings. This report finds that placing such a restriction on new homes would only limit the occupancy of a very small number of the homes available for second home use and as a result would serve to deflect the demand for second homes into the existing housing stock without reducing the overall proportion of second homes and holiday homes. Further, any reduction in sales values of the new dwellings as a result of the restriction is likely to be relatively marginal and would not render the properties genuinely affordable for local people, but it would impact sales values for new developments and therefore limit the viable provision of affordable homes, such that it would have a negative overall effect on the affordability of local housing. The Holkham Estate's proposed Policy Plus Plus approach presents an alternative way forward to viably secure more genuinely affordable homes for local people.

Five Year Housing Land Supply

The Council has not published a five year housing land supply statement since April 2020. This statement identifies a marginal 5.16 year supply which we understand is now below five years due to the impact of Nutrient Neutrality. This issue was discussed during the recent appeal at Kelling Park (reference APP/Y2620/W/21/3272150) and in a further submission¹ following the close of the appeal, the Council's Planning Policy Manager, Mark Ashwell, accepted that the Council could not now demonstrate a five year supply. This is confirmed in the appeal decision dated 12th October 2022 in which the Inspector finds that the true level of supply is likely below the 4.9 years claimed by the Council during the appeal.

The Proposed Development

The proposed plans for the site have been designed to accord with the emerging policy allocation. In summary, the proposal comprises:

- 51 high quality homes that have been designed to reflect the vernacular architecture and traditional materials used in the local area (e.g. red roof tiles, flint and red brick walls and timber windows). Please see **enclosed** Illustrative House Types taken from a Holkham Estate scheme in Burnham Market that demonstrate the design quality proposed.
- A mix of dwellings comprising 8no. 1 bedroom apartments, 15no. 2 bedroom houses, 18no. 3 bedroom houses, 7no. 4 bedroom houses and 3no. 5 bedroom houses.
- A unique tenure mix that follows our client's **Policy Plus Plus** approach to meet the critical local need for rented properties in Wells-next-the-Sea (see below for more details).
- Vehicular access is proposed from Mill Road to the south and pedestrian and cycle accesses are proposed from Holkham Road to the north and Bases Lane to the east. The existing pedestrian access to the site from Westfield Avenue will also be retained.

¹ Letter Reference PF/20/1056, dated 05 April 2022

- A landscaping strategy that seeks to protect and enhance existing hedgerows and trees, provide landscape planting to the site boundaries and create a 0.63ha area of public open space to the north-east of the site.
- The provision of far greater than 10% Biodiversity Net Gain through on-site habitat creation.
- A surface and foul water drainage strategy that utilises Sustainable Drainage Systems (SUDS), including permeable paving, on plot soakaways and filter strips and drains.

Planning Assessment

This section provides a planning assessment of the proposed development against adopted and emerging planning policy. It focusses on the principle of development and the proposed housing mix.

Principle of Development

The site is located outside the settlement boundary of Wells-next-the-Sea on land adjoining the western extent of the built up area. It is therefore defined as being within the countryside where new development is restricted by Core Strategy Policies SS 1 and SS 2. The proposal would be contrary to adopted policy in this respect, but it must be recognised that the Core Strategy planned for a period up to 2021 and its restrictions don't allow for current housing needs in the district. These restrictions must therefore be considered to be out-of-date. In this context, there is significant justification to bring the site forward for the proposed development now:

- **Emerging Local Plan:** The only document that seeks to plan for current needs is the emerging Local Plan which proposes to allocate the site for approximately 50 dwellings. The emerging plan has reached a relatively advanced stage of preparation having undergone Regulation 19 pre-submission consultation and should therefore be afforded weight in decision taking in accordance with NPPF paragraph 48.
- **Out of Date Development Plan:** The adopted development plan is both time expired and must be considered out of date as a result of the Council's inability to demonstrate a 5 year housing land supply. The policies that are most important for determining the application are therefore out-of-date and the presumption in favour of sustainable development at NPPF paragraph 11(d) applies. Planning permission should therefore be granted for the proposals unless:
 - The application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or**

In this respect, we consider that the proposed development would not be caught by any of the policies referred to at NPPF footnote 7. In particular, the proposal would not impact on protected habitats sites (**n.b. it is in one of the limited parts of the district not affected by Nutrient Neutrality**) and whilst it is located within the AONB it is of a modest scale that would simply round-off existing development to the west of the town. The site's setting is informed by the existing urban edge, such that the nature of the proposed residential development would be viewed in this context. The Landscape Partnership has been instructed by the Holkham Estate to undertake a Landscape and Visual Impact Assessment of the site for the forthcoming application. At this stage they have undertaken an initial assessment of the proposal (**enclosed**) which concludes that development at the site of the type proposed would have a limited influence on the wider landscape and that it would not have a significant adverse effect on the special qualities of the AONB. As such, it is considered that the development would not be Major Development within the terms of NPPF para 177, in that it would not have a significant adverse impact on the purposes for which the area has been designated or defined, when taking into account its nature, scale and setting. Further, an initial heritage appraisal

has been undertaken by JB Heritage Consulting (**enclosed**) that concludes that there would be a limited impact on the Wells-next-the-Sea Conservation Area which is considered capable of being ameliorated through high-quality design and would not preclude the development of the site.

ii. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.

The proposed development would deliver significant benefits with respect to the delivery of housing at a time when the Council cannot demonstrate a five year supply and many developments are stalled due to Nutrient Neutrality. It would provide affordable housing to meet specific local needs, economic benefits throughout construction and occupation, Biodiversity Net Gain, improve pedestrian and cycle connections and provide public open space. These benefits combined are substantial and would outweigh any less than significant adverse impacts on landscape or the character of the area which are greatly reduced due by the high quality design in accordance with the emerging allocation.

In the context of the emerging allocation, the out of date development plan and the clear planning balance in favour of the proposed development, we consider the principle of the proposed development to be acceptable.

Housing Mix

This sections starts by summarising local needs identified in the Housing Needs Assessment (HNA) (**enclosed**). It then provides a review of adopted and emerging planning policy, before outlining our client's **Policy Plus Plus** approach and providing an assessment to demonstrate how it would meet the town's needs.

Housing Needs Assessment (HNA)

As set out above, the Holkham Estate commissioned a Housing Needs Assessment (HNA) working with the Town Council to better understand local housing needs and how they can tailor their proposals to meet identified needs. The HNA presents a complex picture of needs including for small market housing, affordable home ownership products and in particular rental properties (both affordable and private). The four key issues identified are:

- i. **Diminishing private rental sector:** There is a diminishing private rental sector due to competing demand from holiday lets. This is squeezing out people who work in the local area who can't afford to buy, but wouldn't qualify for traditional affordable housing tenures.
- ii. **A need for more affordable rental stock:** Despite a large existing stock (334 in Wells and 438 across the 5 local parishes covered by the HNA) there are 156 people on housing register (5 parishes) and an average of 20 lets per year.
- iii. **Under-occupancy:** the vast majority of dwellings in Wells are under occupied due to high numbers of single and double person elderly households living in larger 3 and 4 bedroom homes. To solve this there is a need for need for aspirational downsizing in 1, 2 and smaller 3 bedroom homes.
- iv. **Lack of affordable ownership products:** There are hardly any shared ownership dwellings in Wells-next-the-Sea (just 6 in 2011). First Homes represent an opportunity to address this.

Policy Requirements

Core Strategy Policy HO 1 requires at least 40% of dwellings to have 2 bedrooms or fewer with internal floor spaces of not more than 70 sqm and 20% of the dwellings to meet M4(2) accessible and adaptable standards.

Policy HO 2 requires the provision of 45% affordable housing on sites of 10 or more dwellings. There is an argument that this requirement is now out-of-date as it has been superseded by the detailed evidence on need and viability prepared for the emerging Local Plan which only requires 35% at emerging Policy HOU2. However, from our recent pre-application enquiry for Land South of Ashburton Close, Wells, we understand that the Council still require 45% affordable housing from sites in Wells.

Policy HO 2 also sets an aim for 80% of affordable housing provision to be social rented accommodation, but caveats this by saying that the tenure split should be based on identified needs at the time of the proposal as demonstrated in the SHMA and waiting list information. In this respect it is appropriate to use the tenure split set out at emerging Policy HOU2 as it is based on the Council's analysis of the evidence contained in the most recent SHMA. This policy requires 25% First Homes and the remainder split between social, affordable or intermediate rent with the tenure split to be determined on a case by case basis in accordance with local needs evidence. As set out in more detail above and below, the HNA demonstrates a clear need for social rent, First Homes and intermediate rent for key workers.

Proposed Housing Mix

The submitted Site Layout and accompanying Plot Schedule show a mix comprising:

No. Bedrooms	Type of Dwelling	Total Dwellings	Percentage
1	Apartment	8	16%
2	House	15	29%
3	House	18	35%
4	House	7	14%
5	House	3	6%
Total		51	100%

In accordance with Core Strategy Policy HO 1, more than 40% of the dwellings have 1 or 2 bedrooms, but it is not currently proposed to restrict internal floor spaces to less than 70 sqm. The 1 bedroom apartments are smaller than this, but not the two bedroom houses. A high proportion of the 2 bedroom houses will be provided as affordable housing and it is not considered appropriate to restrict these properties to a maximum size. We would appreciate the Council's advice regarding flexibility on this point.

It is also proposed that 20% of the dwellings will meet M4(2) accessible and adaptable standards.

Proposed Tenure Mix

Our client's **Policy Plus Plus** approach has been designed to meet the needs identified in the HNA by providing a mixture of tenures focussing on the provision of rental properties and smaller dwellings. The precise size of dwellings to be delivered in each tenure is still to be determined, but the overall tenure split proposed is as follows:

Tenure		No. Dwellings		Percentage	
Private	Private Sale	23	28	45%	55%
	Private Rent	5		10%	
Affordable	Social Rent	9	23	17.5%	45%
	Intermediate Rent	9		17.5%	
	First Homes	5		10%	
Total		51		100%	

It is proposed that the scheme would deliver 45% affordable housing in accordance with Policy H0 2. The proposed tenure split of the affordable housing would deliver 25% First Homes in accordance with National Planning Practice Guidance (ID: 70-001-20210524) and the remaining 75% for rent would be split roughly equally between 9no. Social Rent dwellings provided in accordance with the government's rent policy and 9no. intermediate rent dwellings provided to key works through Homes for Wells².

In addition to providing 23no. affordable dwellings the proposal would deliver an additional 5 dwellings for private rent to meet a critical local need. These dwellings would be retained by the Holkham Estate for private rental to local people and estate workers. The proportion of homes proposed for private sale is therefore just 45%.

Design

In accordance with the requirements of emerging Policy W07/1, the proposal would provide approximately 50 dwellings with a higher number at 51 dwellings currently proposed. In accordance with the emerging allocation, the design of the proposal has paid careful attention to the site layout, building heights and materials, as follows:

- **Site Layout:** The layout seeks to ensure the retention of trees and hedgerows along the site boundaries, new landscape planting along the northern and eastern site boundaries, the delivery of the required 0.6ha of public open space provision to the north-east of the site, vehicle access from Mill Road and pedestrian and cycle access from Mill Road, Holkham Road and Bases Lane (and retained pedestrian access from Westfield Avenue).
- **Building Heights:** The proposed dwellings would be two storey with pitched roofs in accordance with the local character.
- **Materials:** It is proposed that the dwellings will reflect local vernacular architecture in terms of their design and materials (e.g. red roof tiles, flint and red brick walls and timber windows).

Highway Access

This submission is supported by a Transport Scoping Note (**enclosed**) prepared by KMC Transport Planning. This report demonstrates that the site is within a 10-minute walk of amenities in the centre of Wells-next-Sea and local bus stops. Local schools are also within walking distance. Safe and suitable vehicle access is proposed from Mill Road with a simple priority T-junction. There have been no collisions recorded on Mill Road in the vicinity of the proposed site access and there are therefore no existing safety concerns in this area. In accordance with the emerging site allocation, a pedestrian and cycle connection will be provided to Bases Lane. A pedestrian and cycle access will also be provided to Holkham Road to the north of site. The pedestrian connection will include an extension of the 2m footway on the southern side of Holkham Road to continue into the site. It is anticipated that 50 dwellings would generate 27 vehicle movements in the AM and PM peak periods which would have a negligible impact on surrounding roads.

Drainage

This submission is supported by a Flood Risk and Drainage Strategy Note (**enclosed**) prepared by Ingent. This demonstrates that all of the proposed development site is in flood zone 1 outside of tidal floodplain, other than a thin strip on the northern boundary against Holkham Road. Holkham Road is within 2km of the coast and at risk of tidal flooding, but as the site is around 1.5m higher than Holkham Road it is only the boundary hedge and

² Homes for Wells is a Charitable Community Benefit Society and Registered Provider that was formed in 2006 to provide affordable homes for the people of Wells with priority given to local key workers (<https://homesforwells.com/>).

verge embankment that is at flood risk. The proposed area of development. The primary site access and pedestrian links other than that to Holkham Road are all in floodzone 1.

Infiltration testing has been carried out across the site which demonstrates that drainage to the ground is feasible. The proposed drainage strategy therefore utilises filter strips and drains, on-plot soakaways and permeable paving. Anglian Water records indicate the presence of a 150mm sewer in Holkham Road immediately to the north of the site and this will be the preferred point of discharge for foul water from the proposed development.

Landscape

The Landscape Partnership has been instructed by the Holkham Estate to undertake a Landscape and Visual Impact Assessment of the site for the forthcoming application. At this stage they have undertaken an initial assessment of the proposal (**enclosed**) which concludes that development at the site of the type proposed would have a limited influence on the wider landscape and that it would not have a significant adverse effect on the special qualities of the AONB.

Soft landscaping proposals will include significant new hedgerow and tree planting throughout the site and in particular along the northern site boundary and within the open space.

Biodiversity and Trees

This submission is supported by an Ecological Assessment (**enclosed**) prepared by Hopkins Ecology. This demonstrates that the site largely comprises improved grassland with six lengths of hedgerow along the site boundaries. Most species of conservation concern are scoped out of the assessment and appropriate mitigation is identified for foraging bats, nesting birds, hedgehogs and widespread moths that are likely to be present in low numbers on the site. The assessment includes a Biodiversity Net Gain calculation that demonstrates that approximately +39% can be delivered on-site through habitat enhancements. The assessment also includes a shadow Habitats Regulations Assessment which demonstrates that the site is not caught by Nutrient Neutrality, isolation impacts from recreational disturbance can be scoped out and in combination recreational impacts would be mitigated through a payment to the Norfolk Green Infrastructure and Recreational impact Avoidance and Mitigation Strategy (GIRAMS).

A tree survey has been undertaken by Ravencroft Arboricultural Services (**enclosed**) and the scheme has been designed to ensure the retention of important trees and hedgerows wherever possible.

Heritage

A heritage review has been undertaken by JB Heritage Consulting (**enclosed**) which identifies that the Wells-next-the-Sea Conservation Area boundary lies in close proximity to the eastern boundary of the site, within which there are numerous listed buildings. It concludes that the proposal would only have a limited impact on the Conservation Area (a conclusion which is supported by the emerging Local Plan evidence base) and which is considered capable of being ameliorated through the proposed high-quality design. Should there be any residual level of less than substantial harm to the Conservation Area, this would need weighing against the substantial benefits of the proposal in accordance with NPPF paragraph 202. Given the high quality design proposed, the potential for limited impact on the Conservation Area would not preclude the development of the site.

The Grade I Registered Park and Garden of Holkham Hall is located at over 500m from the closest part of the site. The registered landscape comprises a dense pocket of woodland in the north-eastern corner. This feature, together with the intervening land, create physical separation between the site and historic landscape.

An Archaeological Desk-Based Assessment of the site has also been undertaken (**enclosed**). Based on review of existing information for the surrounding search area, and the geophysical survey results, the site is assessed to have at most a low potential for additional significant archaeological remains of all periods. There is no suggestion that the site contains heritage assets likely to be a constraint to development or which might require further investigation to inform decision-making on the planning application. However, considering a Post Medieval windmill was located within the south-western field of the site, the Local Planning Authority may require trenching along the route of the proposed new road, and within the central field which is proposed for the residential development. Any such further archaeological work can be secured by condition attached to the planning consent, if required.

Summary and Conclusion

The adopted development plan is out of date as it is both time expired and the Council is unable to demonstrate a 5 year housing land supply. In this context, there is significant justification for bringing the site forward now. The site is an **emerging allocation at Policy W01/1** of the new Local Plan. It is sustainably located on the edge of Wells-next-the-Sea, its development would round-off the western edge of Wells and the proposed development has been designed to accord with the emerging allocation.

The proposed development would deliver significant benefits with respect to the delivery of housing at a time when the Council cannot demonstrate a five year supply and many developments are stalled due to Nutrient Neutrality. It would provide affordable housing to meet specific local needs, economic benefits throughout construction and occupation, Biodiversity Net Gain, improve pedestrian and cycle connections and provide public open space. These benefits combined are substantial and would outweigh any adverse impacts on landscape or the character of the area and any residential impact on the Conservation Area which are greatly reduced due by the high quality design in accordance with the emerging allocation.

In the context of this emerging allocation, the out of date development plan and the clear planning and heritage balance in favour of the proposed development, we consider the principle of the proposed development to be acceptable.

As part of this pre-application request, we would welcome a discussion with planning officers on the principle of bringing the site forward for development, the design of the proposal and the proposed housing mix.

We trust that the information included with this submission is sufficient to validate this advice request. If, however, you have any additional questions in respect of any of the above please do not hesitate in contacting either me or my colleague David Jones. We look forward to meeting with you and the Council's housing team soon.

Yours sincerely



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

Director

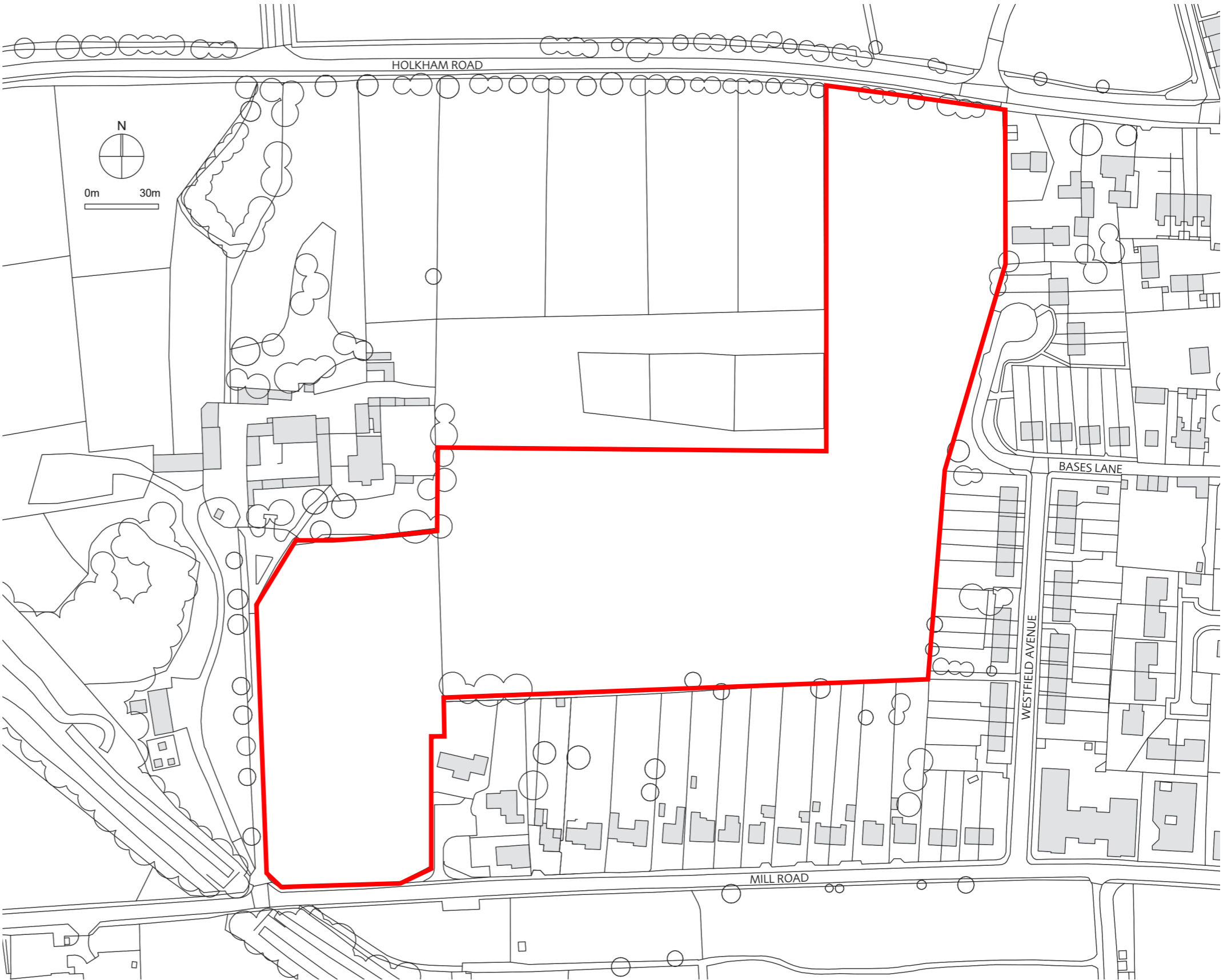
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Encs

2. Location Plan, Holkham



3. Original Site Layout, Feilden+Mawson, March 2023

Site Layout



**4. LVIA – Initial Appraisal: Key Landscape and Visual Receptors, The Landscape Partnership,
10th February 2023**

Mill Road, Wells-next-the-Sea, Norfolk

Landscape and Visual Impact Assessment

Initial appraisal: Key landscape and visual receptors

for

Holkham Estate

Pre-App | 10th February 2023

Contact:

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The Landscape Partnership Ltd is a practice of Chartered Landscape Architects, Chartered Ecologists and Chartered Environmentalists, registered with the Landscape Institute and a member of the Institute of Environmental Management & Assessment and the Arboricultural Association.

Registered office

The Landscape Partnership

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Bedford
MK40 3JG

Registered in England No. 2709001

Contents

- 1 Introduction
- 2 Site context
- 3 Key landscape and visual receptors

1 Introduction

1.1 Background to the project

- 1.1.1 The Landscape Partnership has been commissioned by the Holkham Estate to undertake a Landscape and Visual Impact Assessment (LVIA) of a proposed residential development at Mill Farm, on the western edge of Wells-next-the-Sea, Norfolk.
- 1.1.2 The site currently comprises agricultural land between Mill Road and Holkham Road and is located in the Norfolk Coast Area of Outstanding Natural Beauty (AONB). The site adjoins existing residential development to the south and east.
- 1.1.3 The preparation of the LVIA has been split into two stages. Stage 1 is the assemblage of the baseline conditions, and Stage 2 will extend the baseline to include the detailed findings of the LVIA, i.e. it will be an assessment of the likely effects of the proposed development on landscape and visual receptors, and a description of the landscape strategy to mitigate any adverse effects on the character of the surrounding landscape and its visual amenity, as arising from the scheme.
- 1.1.4 In order to inform the design and layout of the emerging scheme proposals and to seek pre-application advice from North Norfolk District Council, an initial appraisal of key landscape and visual receptors has been undertaken. It identifies sensitive landscape and visual receptors to be considered in the LVIA, broad opportunities for landscape enhancement and, where appropriate, a strategy to mitigate any adverse effects.
- 1.1.5 This report relays the findings of the initial appraisal of key landscape and visual receptors.

2 Site context

- 2.1.1 The proposed site relates to an area of farmland at the western edge of the settlement of Wells that currently consists of fenced paddocks. Part of the site is also used as a caravan site for touring caravans/campervans. The site does not presently feature any built development.
- 2.1.2 The site comprises three relatively discrete areas. For the purposes of this appraisal and to aid clarity in descriptions, they have been referred to as:
- Parcel A: the southernmost parcel, which fronts Mill Road;
 - Parcel B: the larger, central parcel; and
 - Parcel C: the northern parcel that abuts Holkham Road.
- 2.1.3 The southern edge of Parcel A fronts on to Mill Road and consists of a discrete field that lies between Mill Road and Mill Farm. Parcel A is enclosed by a post and mesh fence, and the existing farm access track follows a line along the western boundary of this field.
- 2.1.4 The main part of the site, Parcel B, lies to the east of the farmstead and is contained by housing to the south (rear gardens of dwellings fronting Mill Road) and east (rear gardens in Westfield Avenue). The boundaries with the residential properties are marked mainly by hedgerows, with

some fencing, while the boundary with Bases Lane is marked by a native hedge. Parcel B is open to the north, allowing views towards the coast.

- 2.1.5 The proposed site also includes a northward extension to Holkham Road (Parcel C) that encompasses a sloping field with a permanent grassland landcover. The boundary with Holkham Road itself is marked by an outgrown native hedge. There is also access onto Holkham Road via a gap in the hedge. Parcel C offers panoramic views northwards.

3 Key landscape and visual receptors

3.1 Overview

- 3.1.1 Key sensitive receptors in the vicinity of the site are considered below and listed in Table 3.1, together with a brief outline of initial observations as to the likely effect of the proposed development and notes as to potential mitigation measures that might be appropriate to negate or offset such effects to within acceptable thresholds. It should be noted that such receptors and mitigation measures have been identified as part of the baseline assessment, without recourse to an appropriate impact assessment or scheme proposals, thus they may not be exhaustive.
- 3.1.2 The findings of this section will be used to inform the design and layout of the emerging development proposals.

3.2 Key sensitive landscape and visual receptors

Norfolk Coast AONB

- 3.2.1 The AONB includes settlements and buildings, and these elements make a strong contribution to the distinctiveness and charm of the area. The North Norfolk landscape has a long history of settlement, so buildings might be considered intrinsic to the character of the area. At the same time the AONB is valued amongst other things for its landscape and its relatively undeveloped character (which is also recognised in the Heritage Coast designation). The published landscape character assessments state that the AONB is sensitive to unsympathetic development which could dilute or undermine the character of the area. At the same time, well designed development could contribute to the character of the AONB.
- 3.2.2 The AONB designation confers a high degree of protection to the landscape. The NPPF states that great weight should be given to conserving and enhancing landscape and scenic beauty, and the scale and extent of development should be limited. The NPPF goes on to state that within AONBs permission should be refused for major development other than in exceptional circumstances. Consideration of such applications should include an assessment of the need for the development, as well as detrimental effects on the landscape and recreational opportunities, and the extent to which that could be moderated.
- 3.2.3 The statutory duty to protect natural beauty has to be reconciled with meeting local needs. This balance is also recognised in the Policies for the AONB set out within the Management Plan.
- 3.2.4 Some limited housing development has been allowed within the AONB in recent years. In 2013, permission was granted for 123 homes at the southern edge of the town (Planning reference: PF/13/0007). North Norfolk District Council is currently consulting on a new local plan for the

district which will guide development decisions until 2036. The proposed submission version of the emerging Local Plan identifies the site as an affordable housing zone (Policy HOU2). In addition to this, the Neighbourhood Plan for Wells intends to allocate some further sites for affordable housing. This shows that some development can be accepted within the AONB in certain circumstances.

- 3.2.5 Paragraph 177 of the NPPF refers to detrimental effects on the environment, the landscape and recreational opportunities, but does not refer to potential landscape enhancements. Paragraph 176 on the other hand refers to the conservation and enhancement of landscape and scenic beauty. Areas of public open space at the site could be considered a genuine enhancement in that they would create new opportunities to access the landscape and enjoy its special qualities. Public open space in Parcel C would be ideally located to provide public enjoyment in that it looks northwards across the coastal shelf to the sea. This would also provide new opportunities to experience panoramic views from publicly accessible viewpoints.
- 3.2.6 In terms of detrimental effects, development by its nature would be likely to have a negative effect on the undeveloped qualities of the AONB. This effect could be reduced by maintaining and managing existing site boundaries and establishing planting which would screen development; however, the latter technique may not always be the most appropriate approach. As noted above, built features are an element of the AONB. The buildings within Wells are visible from the surroundings and are not screened. Furthermore, it is difficult to screen buildings that are on a low ridge. In this case, the best way to conserve the special qualities of the area would be to design locally appropriate buildings which reinforce the character of the town and the wider AONB and use planting, perhaps in the form of native hedges, with hedgerow standard trees, to help integrate the development into the surrounding landscape framework.
- 3.2.7 The design of the development is a material consideration which can carry weight. Paragraphs 126 to 136 of the NPPF concern good design, while Paragraph 128 of the NPPF refers to the importance of local design codes, which can be used to create beautiful and distinctive places. To this end North Norfolk District Council has produced a Design Guide for the district.
- 3.2.8 The morphology section of the design guide shows the underlying geology which gives shape to the land, and also helps to determine what the typical building materials are. Chalk underlies the entire district but only approaches the surface in the west, in the area around Burnham Market. The Norfolk Strategic Stone Study by the British Geological Survey and English Heritage discusses local building stones. This includes cretaceous era Chalks (also known as Clunch), and Carstone, as well as quaternary era Flint (which includes both Field Flint and Beach Flint). It is noted that exotic pebbles can also be found in coastal settlements (e.g. at Steadmans Yard in Wells-Next-The-Sea). Orange peg tiles are ubiquitous within Wells, and a strong component of the local identity. Handmade orange bricks are the commonest building material, with flint also making an important contribution, particularly for garden walls. Some buildings are also rendered.
- 3.2.9 Wells has a distinctive urban grain with many small streets (yards) running parallel to each other. The town also features a compact layout of properties, many of which are cottages. The proposed development would, however, have to meet modern design standards for highways, etc. so it would not be possible to replicate these qualities exactly.

3.2.10 In summary, it is envisaged that development at the site of the type proposed would have a limited influence on the wider landscape and that it would not have a significant adverse effect on the special qualities of the North Norfolk AONB. As such, it is considered that the development would not be Major Development within the terms of NPPF para 177, in that it would not have a significant adverse impact on the purposes for which the area has been designated or defined, when taking into account its nature, scale and setting.

Wells-Next-The-Sea Rolling Open Farmland (ROF7)

3.2.11 The setting of Wells is potentially sensitive to change. It is noted that *“The town and harbour has a distinctive, dramatic and undeveloped coastal landscape setting,”* while the inherent sensitivities of the area include *“The highly distinctive landscape setting of Wells, which is sited within a very undeveloped and rural coastal location, including views from approach roads and the surrounding countryside.”* The influence of the proposed development on the landscape setting of Wells would seem therefore to be the main consideration in relation to any effects on landscape character.

3.2.12 The site can be seen together with the town in views from the north from The Bank and Beech Road, and from certain points on the Norfolk Coast Path. It can be said that the site forms part of the setting of the town in these views. Views from other directions are largely contained by existing buildings and vegetation and are less consequential.

3.2.13 The site slopes up from north and south and can be considered to form part of the landscape setting of the town. It is unlikely that Parcel C would be suitable for residential development due to its more exposed aspect and the influence it affords on the landscape to the north. Similarly, Parcel A contributes to the setting of the Mill Road frontage. Parcel B is likely to have the most capacity for housing from a landscape perspective. Housing behind the site at Mill Road and to the east already influences this parcel of land.

3.2.14 New houses, nonetheless, have the potential to be prominent based on their elevated position. The key to mitigation therefore will be the appropriate design of the new housing. The best way to avoid detrimental effects will be to create new buildings that reflect the existing character of the town so that they harmonise with existing buildings and appear appropriate to the place. Wells features a distinctive pattern of closely spaced parallel streets. The existing urban form is very compact, with many smaller cottages and shops lining narrow streets. At the western edge of the town are more substantial properties set in larger gardens (which are typically enclosed by brick and flint walls). The town has a strong geometric character with streets generally aligned parallel or perpendicular to the coast. These qualities of the existing townscape should be reflected in the proposals for the site. The buildings should be appropriate to their location in terms of their height, scale and form, materiality and detailing.

3.3 Summary table

Sensitive landscape or visual receptor	Potential effects	Potential mitigation
Site features		
Landform	<p>The site is located on a low ridge that reflects the surrounding topography. Parcel B is located at the highest point of the site, with the land sloping down to Parcels A and C to the south and north respectively.</p> <p>The accommodation of buildings, roads, etc. would have the potential to exert an influence on the topography and its appreciation.</p>	<p>Retain general character of the landform.</p> <p>Careful design required such that buildings, etc. are orientated to negate the need for extreme, abrupt changes in level or gradient, or the need for bunds or retaining structures.</p> <p>Buildings, etc. to be located to minimise adverse effects and to be accommodated without abrupt changes in levels or steep gradients, and without the need for retaining structures or similar, or the use of bunds, all of which would appear alien to the character of this landscape.</p> <p>Where possible, levels should follow the general gradient, e.g. to follow the contours.</p>
Soils	<p>Potential for disturbance of soils in developed portions of the site</p>	<p>Where necessary, the existing soils at the site would be stripped prior to works commencing, separated into topsoil and subsoil, and stored in a manner that would safeguard their long-term health.</p> <p>On completion of the building works the soils would be used as part of the landscape scheme. It is unlikely that the existing soils would need to be supplemented by the importation of topsoil in order to deliver the proposed landscape scheme.</p>
Vegetation and boundaries	<p>Woody vegetation at the site is limited to boundary hedges and should be protected and retained within the development.</p> <p>Existing vegetation should be protected during construction works in accordance with BS5837:2012, to ensure its long-term health and viability, and contribution to the landscape.</p> <p>Development at the site should be accompanied by a comprehensive landscape scheme that could include new tree and shrub planting and management</p>	<p>Retain existing field patterns within development, to maintain the character, scale and grain of the landscape.</p> <p>Wherever possible, retain existing boundary features in a meaningful, continuous manner.</p> <p>Retain existing trees and hedges.</p> <p>No development within the root protection area of hedges and trees.</p> <p>Planting of new native trees and shrubs.</p> <p>Infill and management of existing hedges.</p>

Sensitive landscape or visual receptor	Potential effects	Potential mitigation
	<p>of existing hedges to ensure their long-term contribution to the landscape.</p> <p>If Parcel B is to be developed, it may be appropriate to plant a hedge with hedgerow standard trees on its northern boundary to help assimilate development into the landscape and safeguard views from points to the north.</p> <p>Together, this new planting would deliver features typical of the character of this landscape and help integrate the proposed development into the surrounding vegetation framework.</p> <p>It is considered that development of the site in the manner proposed and the potential for locally-appropriate planting would result in a net beneficial effect on vegetation</p>	
Land-use	<p>Part of the site is allocated in the emerging local plan for residential uses, with provision for open space.</p> <p>Development would result in changes in land use at the site through loss of grazing land and camping facilities and the introduction of buildings and associated infrastructure, and areas of open space.</p> <p>Opportunity to provide significant areas of green infrastructure and the areas of open space, and for them to be managed in a way that provides more variety of habitat than currently exists with the paddocks.</p>	Significant portions of the site to be retained as green infrastructure, for open space and for habitat creation.
Effects on Landscape Character		
Norfolk Coast AONB Integrated Landscape Character Guidelines Wells-next-the-Sea Rolling Open Farmland (ROF7)	<p>The character of the site itself would inevitably change as a result of development.</p> <p>The site is contained to the south and east by existing development which reduces its sensitivity compared to other parts of the character area.</p> <p>Clearly the proposed development would affect an area of farmland – which is characteristic of the area. The effect therefore is judged to be adverse. Parcel</p>	<p>Development should reflect the geometric pattern of the existing urban area, where streets have a general east-west and north-south grain.</p> <p>The design of the buildings should also be appropriate in terms of height, scale and form. Two storey buildings with pitched roofs would be appropriate. The materials and detailing should reflect local characteristics. Orange peg tile roofs in particular are a characteristic feature of</p>

Sensitive landscape or visual receptor	Potential effects	Potential mitigation
	<p>B is likely to be the most appropriate location for development and this portion of the site has close associations with the town and a somewhat domesticated character.</p> <p>The proposals would be seen as a small extension of the town and would only affect a small part of the overall character area.</p> <p>The development would also be contained by existing development to the south and the farmstead to the west, so the effects on the wider character area would be difficult to perceive.</p>	<p>the town, and consideration should be given to reflecting these and other vernacular themes in the design. Brick and flint walls and native hedges are locally appropriate boundary treatments.</p> <p>The design of the open spaces(s) should facilitate public enjoyment of the area (with paths, benches and bins etc) without introducing alien features or clutter which would detract from its character.</p> <p>Any new planting should be locally appropriate.</p>
<p>Norfolk Coast AONB Integrated Landscape Character Guidelines Wells/Holkham Coastal Marshes (OCM6)</p>	<p>The site would be seen from this area. Development would have some influence on the setting of this area as a result of the introduction of additional development.</p>	<p>It will be important to design a development which integrates with the existing town to avoid adverse effects on this area.</p> <p>The northern edge of the development will be important to ensure development within the site assimilates into the wider landscape.</p> <p>Housing should be appropriate in terms of its design, height and scale, materials and detailing (two storey buildings with pitched roofs would be appropriate).</p> <p>The proposed public open space will be visible. It will be important to avoid introducing visual clutter or ornamental planting to the view.</p>
<p>Norfolk Coast AONB Integrated Landscape Character Guidelines Holkham Park (WP1)</p>	<p>The character area also includes a hinterland beyond the perimeter belts. There are, however, no publicly accessible views of the site from this area.</p> <p>From within this area, views of any development at Parcel B would be filtered by the existing vegetation. The new housing would also be located behind existing dwellings on Mill Road. The influence on this character area would therefore be minimal.</p>	

Sensitive landscape or visual receptor	Potential effects	Potential mitigation
North Norfolk Landscape Character Assessment Rolling Open Farmland (ROF1)	As above	As above
North Norfolk Landscape Character Assessment Open Coastal Marshes (OCM)	As above	As above
Effect on views		
Views from the north	<p>These comprise views from public footpath Holkham FP1/Wells-Next-The-Sea FP28 and those which are available from The Bank and Beach Road. These are sensitive views.</p> <p>Development within Parcel B would be visible at the western edge of Wells. The new houses would be seen against a backdrop of housing at Mill Road but are still potentially prominent.</p> <p>Open space within Parcel C would also be visible on the lower slopes.</p>	<p>It will be important that the new development reflects the existing character of the town to avoid detrimental effects on its setting.</p> <p>The northern edge of the development is the most important from a visual perspective.</p> <p>Screening the new housing with planting would take time, and would not be particularly appropriate. Rather, the creation of a meaningful planting belt, perhaps in conjunction with the open space at Parcel C, would be more appropriate in order to assimilate the new development into its wider landscape. This could take the form of a hedge with hedgerow standard trees, supplemented by boundary planting within Parcel C.</p> <p>The design of the public open space is also important. This should avoid introducing visual clutter and ornamental planting - which would be inappropriate additions to the view.</p>

Sensitive landscape or visual receptor	Potential effects	Potential mitigation
Views from the east	<p>These comprise views from within the town to the east.</p> <p>These views are contained by the existing houses, vegetation and boundary features within the town. There are few clear views into the site or the wider landscape.</p> <p>The foreground of the view consists of residential areas. New houses at Parcel B would be largely screened but may be partially visible from localised points, e.g. from Bases Lane. These new elements would be consistent with the existing features of the view, so the change is considered to be small.</p>	
Views from the south	<p>Existing housing at Mill Road is visible from certain points to the south. This housing is somewhat prominent.</p> <p>New housing at Parcel B is likely to be discernible behind the existing dwellings on Mill Road. Given that this new housing would be situated behind the existing this would represent a small change to the existing views.</p>	
Views from the west	<p>This includes views from Mill Road and Holkham Road.</p> <p>Views into Parcel B from the west are generally restricted by the intervening vegetation. Views from the roads are restricted by the roadside hedges and intervening trees/landform. The effects on these views therefore would be minimal.</p>	
Views from neighbouring residential properties	<p>The neighbouring houses generally afford long rear gardens, which removes the dwelling from the site boundary. The gardens at Mill Road are up to 50m long while those at Westfield Avenue are c.20m long. These gardens also contain hedges and trees which would partially screen the proposed development.</p> <p>Views from the ground floor and garden areas are likely to be contained by the garden hedges.</p>	<p>Houses should be situated away from the boundary with reasonably deep gardens, to reduce their prominence, and protect residential amenity.</p> <p>Further planting could be introduced on the boundary to provide screening.</p>

Sensitive landscape or visual receptor	Potential effects	Potential mitigation
	<p>The proposal would introduce development in close proximity to the existing houses. This would inevitably have a large effect on views, though less so from ground level.</p>	
Effect on landscape-related designations		
<p>Norfolk Coast Area of Outstanding Natural Beauty</p>	<p>See above</p>	<p>See above</p>
<p>Heritage Coast</p>	<p>Site lies outside Heritage Coast Effects discussed in relation to AONB</p>	
<p>Conservation Areas</p>	<p>The development would not have any direct effect on the Conservation Area. The site can be seen together with the Conservation Area in views from the north. It is also in close proximity to the western edge of the Conservation Area. Development at the site could therefore have some influence on the landscape setting of the Conservation Area.</p> <p>The site is located to the west of the Conservation Area. Some modern development has occurred in the vicinity of the Conservation Area and is already a part of its setting.</p> <p>An appropriately designed development would assimilate with the existing town, which would protect the character of the Conservation Area.</p>	<p>Development at Parcel B would be visible in views towards the old town, and it is therefore important that the design reflects local character, so that it harmonises with the existing settlement.</p>
<p>Listed Buildings</p>	<p>The site does not contain any listed buildings or structures.</p> <p>The site is in close proximity to a number of listed buildings and structures, though direct inter-visibility is limited.</p>	<p>As with the Conservation Area the development should be appropriate to the locality, to avoid detrimental effects on landscape setting.</p>

Sensitive landscape or visual receptor	Potential effects	Potential mitigation
Registered Parks and Gardens	Holkham Park is surrounded by belts of woodland. There is very little visual connection between the site and Registered Park and Garden. Effects on Holkham Park would therefore be minimal.	
National Cycle Network and Norfolk Coast Path	There would be no direct effect on these routes, but there is the potential for changes to views from points to the north of the site. These effects are considered as part of the visual assessment.	

5. Revised Submission Covering Letter, Armstrong Rigg Planning, 12th October 2023

Ref: GA/DJ/04022/L0002

12 October 2023

Sent by email to mark.brands@north-norfolk.gov.uk

Mark Brands
North Norfolk District Council
Holt Road
Cromer
Norfolk
NR27 9EN

Dear Mark

**Request for Pre-Application Advice
Proposed Residential Development for 47 Dwellings
Land at Mill Road, Wells-next-the-Sea**

On behalf of our client, the Holkham Estate, I am writing to submit revised plans in support of their pre-application advice request for a proposed residential development at Land at Mill Road, Wells-next-the-Sea.

Enclosed with this letter are the following plans:

- Site Layout (Ref: DRAFT 11/10/2023)
- Sketch Landscape Strategy (Ref: E22866)

The proposals have been revised in response to consultation comments from the Council's Conservation and Design, Landscape, Planning and Strategic Housing teams. Revisions have also been made in response to comments from NCC Highways (received as part of a separate pre-application advice request) and from local residents and Wells-next-the-Sea Town Council with whom our client has consulted separately.

Wells-next-the-Sea Town Council and Local Residents

Our client has sought to respond positively to the comments received from local residents and the Town Council. In this respect, we are pleased to confirm that the following changes have been made to the proposals:

- The right of access to the rear of existing dwellings on Mill Road is proposed to be retained as a private route only. Access from Westfield Avenue will be retained, but the connection from this route into the development has been removed. This amendment will preserve the security and residential amenity of existing dwellings.

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- Two single storey dwellings have been introduced and other dwellings reoriented along the southern boundary to break-up the mass of the development and preserve existing residential amenity.
- Access from Mill Road (Road A) has been moved east (as far as possible whilst meeting highways design standards) to retain a paddock to west. New hedge and screen planting, including a small copse are shown, with a footpath to one side only.
- More trees are shown within the development layout.
- A design is shown for the northern open space including the proposed play area location and the location of infiltration basin which would be naturally planted.
- A concern was raised by a neighbouring resident with respect to the potential proximity of any footpath routes through the open space to their boundary. In response we can confirm that due to the gradient of the slope on the open space, the proposed path will need to zig-zag through the space to achieve a DDA compliant gradient for wheelchair users. This means that it will only be close to neighbouring residential boundaries for short stretches and in these locations an effort has been made to locate the path as far away from the boundary as possible.

In response to the Town Council's comments on the proposal, we also note that the principle of development on the site is accepted in the emerging Wells-next-the-Sea Neighbourhood Plan Reg. 16 Consultation (WNP). The WNP sets a proposed housing mix for the site based on 51 dwellings. The revised proposals reduce the number of dwellings from 51 to 47 to make room for more tree planting within site, but the proposed tenure split has been retained to accord with the WNP as set out below:

Tenure	WNDP split for 51 dwellings	Percentage split	Current proposal for 47 dwellings
Open market sale	23	45%	21
Private rent	5	10%	5
Social rent	9	17.5%	8
Intermediate (Homes for Wells)	9	17.5%	8
Shared Ownership	5	10%	5
Total	51	100%	47

Strategic Housing Team

The proposed mix set out above also responds positively to comments from the Council's Strategic Housing team. In particular, the proposal maintains the affordable housing provision at 45% (21 no. dwellings) and it now includes Shared Ownership dwellings instead of First Homes.

Conservation and Design, Landscape and Planning Teams

Many of the amendments made in response to the Town Council and local resident's set out above also serve to resolve matters raised by the Council's Conservation and Design, Landscape and Planning teams. In particular:

- Moving the access from Mill Road (Road A) to the east and providing new tree and hedgerow planning; and
- Showing a design for northern open space to demonstrate how the play area and infiltration basin would be accommodated with landscape planting.

The following changes have also been made in response to these consultees:

- Width between building frontages on Road B increased to create room for some maintained landscaping and new trees, to soften street-scene and help break up silhouette of development in long views from coast.
- Introduction of 2no. single storey dwellings on both the north and southern flanks of the development, to give some additional variation in roofline.
- 6m screen planting zone to northern boundary.
- Various revisions to mix/layout of dwellings on Roads B, D and E, due to reduced number and revised mix of dwellings. The layout around Road C essentially unchanged, aside from removal of dwelling from a terrace of three to create a semi-detached pair at plots 42-43.
- Sections of 1.8m tall garden wall are now shown along Roads B & C and low front boundary walls shown on Roads D & E.

NCC Highways

In response to comments from NCC Highways the widths of Roads D & E and geometry of the turning head at the Road B/C transition have been amended.

We trust that the information included with this submission responds positively to the feedback received. We look forward to discussing the proposals with you further.

Yours sincerely



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

Director

Armstrong Rigg Planning

Direct Line: 01234 867130

Mobile No: 07710 883907

Encs.

6. Revised Site Layout, Feilden+Mawson, 11th October 2023

Mill Road, Wells-Next-the-Sea



1. New site access
2. Paddock
3. Residential development - 47 dwellings including 21 affordable (45%)
4. Screen planting
5. Public open space (0.65 hectares) - see also Landscape Strategy Plan
6. Infiltration basin
7. Upgraded/formalised pedestrian link to Holkham Road
8. Play area
9. Pedestrian link to Bases Lane maintained

Use drawn scale.

Mill Road, Wells-Next-the-Sea



1. New site entrance with 2.4m x 59m visibility splay.
2. Wildflower meadow.
3. Screen planting and new hedge.
4. Road A: 4.8 + 2.0m filter margin both sides + 2.0m footpath.
5. Road B: 2.0m filter margin + 2.0m footpath both sides.
6. Maintained landscaping/trees.
7. 4.5m access zone to existing properties maintained.
8. Road C: 4.8m + 1.0m flush margin (not adopted)
9. Single storey dwellings to break up massing
10. Roads D+E: 4.5m shared surface (not adopted)
11. Roads D+E: New 'yards'. Low brick walls to plot frontages.
12. 6m screen planting zone
13. 4 x 1-bed apartments
14. Play area
15. New footpath link north to Holkham Road
16. Pedestrian link to Bases Lane maintained

Scale 1:1000 at A3

7. Sketch Landscape Strategy, The Landscape Partnership, October 2023



KEY

-  Proposed trees
-  Proposed shrub planting
-  Proposed meadow grass
-  Proposed mown paths and amenity areas
-  Proposed Infiltration basin
-  Proposed surfaced path - max 1:20
-  Proposed playground



Sketch Landscape Strategy

E22866, Mill Road, Wells

October 2023

NTRS @ A3

8. Pre-Application Advice, North Norfolk District Council, 4th April 2023

NNDC Ref: DE21/23/0692
Date: 9th February 2024

Registered: 4th April 2023

Mr Geoff Armstrong
Armstrong Rigg Planning
The Exchange,
Colworth Science Park
Sharnbrook,
Bedford
MK44 1LZ

Proposal: Proposed erection of 51 dwellings
Location: Land At , Mill Road, Wells-next-the-Sea, Norfolk,

I write in response to your pre-application enquiry received on 4th April 2023 in respect of the above proposed development. I have now had the opportunity to consider the proposal and my comments are as follows;

Constraints:

The site falls within an Area of Outstanding Natural Beauty (National Landscape) (Policy EN 1)
The site may contain contaminated land (Policy EN 13)
The site falls within an area of designated countryside (Policies SS 1 and SS 2)
The site falls within a Mineral Safeguard Area
The site falls within multiple GIRAMS Zones of Influence
Flood zones 2 and 3 (by Holkham Road)
The site falls within Archaeological Notification Area
The site falls within Undeveloped Coast
Adjacent to Wells Conservation Area

Relevant Planning History:

None.

Planning policies which will be relevant to the proposal:

North Norfolk Core Strategy (September 2008):

Policy SS 1 (Spatial Strategy for North Norfolk)
Policy SS 2 (Development in the Countryside)
Policy SS 3 (Housing)
Policy SS 4 (Environment)
Policy SS 5 (Economy)
Policy SS 6 (Access and Infrastructure)
Policy SS 14 (Wells-next-the-Sea)
Policy HO 1 (Dwelling Mix and type)
Policy HO 2 (Provision of Affordable Housing)

Policy HO 7 (Making the Most Efficient Use of Land (Housing Density))
Policy EN 1 (Norfolk Coast Area of Outstanding Natural Beauty and The Broads)
Policy EN 2 (Protection and Enhancement of Landscape and Settlement Character)
Policy EN 3 (Undeveloped Coast)
Policy EN 4 (Design)
Policy EN 6 (Sustainable Construction and Energy Efficiency)
Policy EN 8 (Protecting and Enhancing the Historic Environment)
Policy EN 9 (Biodiversity and Geology)
Policy EN 10 (Development and Flood Risk)
Policy EN 13 (Pollution and Hazard Prevention and Minimisation)
Policy CT 2 (Developer Contributions)
Policy CT 5 (The Transport Impact of New Development)
Policy CT 6 (Parking Provision)

Minerals and Waste Development Framework - Core Strategy and Minerals and Waste Development Management Policies Development Plan Document 2010-2026

Policy CS16 (Safeguarding mineral and waste sites and mineral resources)

Supplementary Planning Documents:

North Norfolk Design Guidance (2011)
North Norfolk Landscape Character Assessment (2021)
North Norfolk Landscape Sensitivity Assessment (2021)

National Planning Policy Framework (December 2023):

Chapter 2 (Achieving sustainable development)
Chapter 4 (Decision-making)
Chapter 5 (Delivering a sufficient supply of homes)
Chapter 6 (Building a strong, competitive economy)
Chapter 8 (Promoting healthy and safe communities)
Chapter 9 (Promoting sustainable transport)
Chapter 11 (Making effective use of land)
Chapter 12 (Achieving well-designed and beautiful places)
Chapter 14 (Meeting the challenge of climate change, flooding and coastal change)
Chapter 15 (Conserving and enhancing the natural environment)
Chapter 16 (Conserving and enhancing the historic environment)
Chapter 17 (Facilitating the sustainable use of minerals)

Other relevant documents

Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy - Habitats Regulations Assessment Strategy Document (2021)

Officer Assessment:

Main Issues

1. Principle of development
2. Housing Mix
3. Residential amenity

4. Impact on Landscape Character, including the Norfolk Coast Area of Outstanding Natural Beauty (AONB) and undeveloped coast
5. Arboricultural Impacts
6. Ecological impacts
7. Design and Layout and impact on the Conservation Area
8. Open space
9. Highways and Parking
10. Flooding and Drainage
11. Environmental Health
12. Renewable energy generation
13. Minerals Safeguarding
14. Planning Obligations
15. Other matters
16. Summary

1. Principle of Development

Core Strategy Policies

The site lies within an area designated as countryside. The spatial strategy for North Norfolk is set out within Policy SS 1. This states that the majority of new development within the district will take place in the towns and larger villages dependent on their local housing needs, their role as employment, retail and service centres and particular environmental and infrastructure constraints. The policy lists principle and secondary settlements as well as service and coastal service villages. The rest of North Norfolk is designated as 'Countryside' and development will be restricted to particular types of development to support the rural economy, meet affordable housing needs and provide renewable energy. Wells-next-the-sea is designated as a secondary settlement in the settlement hierarchy, however the enquiry site lies adjacent to, but outside of the designated area within a countryside location.

The supporting text to Core Strategy Policy SS 1 explains that new market housing in the countryside is restricted in order to prevent dispersed dwellings that lead to a dependency on travel by car to reach basic services and to ensure a more sustainable pattern of development.

Core Strategy Policy SS 2 permits certain types of development within the countryside, however, in the absence of anything to suggest that the scheme would satisfy any of those categories listed, the enquiry site is not a location towards which new housing is directed within the Core Strategy. The proposal would therefore conflict with Core Strategy Policies SS 1 and SS 2, the requirements of which are set out above.

The Council has been unable to demonstrate a five year supply of deliverable housing sites and this has been a consideration as part of this pre-app submission. The recently amended National Planning Policy Framework (NPPF) has made amendments to how and when the application of paragraph 11d is engaged. This may have an impact for this Council and further consideration of this will inevitably take place in due course. The applicant will be aware that it is the point of determination which is important as to what material considerations apply. This will need to be factored in as part of any future full planning submission.

Should the council not be able to demonstrate a five year or four year supply at the point of determination, the following will be a relevant material consideration: .

11d) provides that where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting planning permission unless:

- i) the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposal, or
- ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

Whilst a full assessment against the above would need to be carried out as part of any submission, the site is located immediately adjacent the settlement boundary in an accessible and sustainable location and the scheme would contribute additional market and affordable housing to the District's housing supply which is an important consideration particularly in light of the Council's absence of a five year housing supply, and the governments objective of significantly boosting the supply of homes. In addition, it would provide employment during construction and future occupants would contribute spending to the local economy which are all matters that weigh in favour of the scheme.

Emerging local plan

At the current time, the emerging local plan is currently going through examination. The weight that can be attached to the new policies coming forward will change as the plan progresses. At the current time, only very limited weight can be afforded to these policies. Whilst the weight afforded to these policies may differ by the time any formal submission is made, it is considered that the guidance set out within this report would largely remain relevant and it is not expected that the new plan would significantly alter the policy position (other than in terms of principle and the site specific requirements as set out within Policy W07/1). Consideration to the existing, emerging and Neighbourhood Plan policies have been given in the details submitted to cover these bases. The site is allocated in the emerging local plan, in bringing this site forward, any proposals would need to accord with Site-Specific Policy W07/1, including the 9 supporting criteria. The Planning Policy team have provided comments on the original proposals, which will be sent alongside this response, the requirements of the aforementioned policy are below;

1. Delivery of high quality design that pays careful attention to site layout, building heights and materials in order to minimise the visual impact of the development on the Norfolk Coast AONB and long distance wider landscape views;
2. Provision of 0.6 ha of high quality public open space including facilities for play & informal recreation;
3. Provision of convenient and safe vehicular access to the site from Mill Road;
4. Retention and enhancement of mature hedgerows and trees around the site boundaries including provision of landscaping along the northern and eastern boundaries;
5. Provision of cycle and step free pedestrian access from Mill Road through the site and public open space to both Bases Lane and Holkham Road, including footway improvements to a minimum width of 2.0m between the Holkham Road pedestrian and cycle access and the boundary of the property known as 4 Laylands Yard;
6. Submission, approval and implementation of a Surface Water Management Plan ensuring that there is no adverse effects on European sites and greenfield run off rates are not increased;

7. Submission, approval and implementation of a Foul Water Drainage Strategy including details of any off-site mains water reinforcement, enhancements and setting out how additional foul flows will be accommodated within the foul sewerage network;
8. Delivery of a scheme that pays careful attention to design and landscaping to minimise any potential impacts on Holkham Hall Registered Park and Garden (Grade I) to the south and west of the site, and to the Wells Conservation Area directly adjacent to the north east and east of the site; and,
9. Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS)

2. Housing Mix

Policy HO 1 states that all new housing developments shall provide at least 40% of the dwellings as having two bedrooms or fewer, with internal floor spaces not more than 70 sq m and that 20% of the dwellings to be provided shall also be provided as accessible and adaptable.

The revised indicative housing mix comprises

- 8 x 1 bed
- 14 x 2 bed (-1)
- 19 x 3 bed (+1)
- 4 x 4 bed (-3)
- 2 x 5 bed (-1)

The numbers of dwellings have been reduced from 51 to 47 (the changes are denoted in the brackets from the original submission), the percentage split however would remain the same with 55% private (45% open market sale, 10% private rent) and 45% affordable housing (social rent 17.5%, intermediate - Homes for Wells 17.5%, shared ownership 10%). There would need to be a mechanism in place for securing these in perpetuity. The split is considered suitable, and a suitable mix is proposed.

Policy HO 1 also requires that 20% (10 units) of the dwellings to be provided should be suitable or easily adaptable to the needs of elderly, infirm or disabled occupants. Such units would be expected to meet the M4(2) Category 2: Accessible and adaptable dwellings or the M4(3) Category 3: Wheelchair user dwellings, standards as contained within the Building Regulations 2010 (as amended) Approved Document M. The supporting statement sets out that this would be policy compliant with 20% of dwellings meeting M4(2) adaptable standards. Appropriate demonstration of this policy requirement would be expected at the application stage.

Affordable Housing

Policy HO 2 states that planning permission for the erection of new dwellings or conversion of existing buildings to dwellings will be permitted provided that, where it is viable to do so, the scheme provides affordable housing in accordance with the following:

On all schemes of 10 or more dwellings or sites of more than 0.33 hectares in Principal and Secondary Settlements, not less than 45% of the total number of dwellings proposed are affordable; that provision is made on the application site; the mix of tenure and size of affordable housing provided reflects the identified housing needs at the time of the proposal as demonstrated in the Strategic Housing Market Assessment and waiting list information and contributes to the Council's target of providing 80% affordable housing as social rented accommodation.

Accessible and Adaptable Homes

These are important for both market and affordable homes. North Norfolk has one of the oldest populations in the country and therefore people who are more likely to need homes that are accessible and adaptable to those with reduced mobility. At least 20% of the affordable houses should be accessible and adaptable, in accordance with policy HO 1.

Nationally Described Minimum Space Standards

Whilst many homes are under-occupied affordable homes are not. This means that meeting the nationally described minimum space standards is important. Housing Strategy agree with the point that Armstrong Rigg make – the minimum space standard for a two bedroom four-person house is 79m², it is more important to meet the minimum space standard than to meet the local plan requirement that 40% of new homes are less than 70m². Flexibility with this policy requirement will therefore likely be required as part of any formal submission.

Market Rent Homes

With very high house prices compared to local incomes, market rent is often a way of accessing housing. There is no way to secure this in perpetuity but it is positive that there will be some market rent homes available at least initially.

Revised Plans

The number of dwellings have been reduced from 51 to 47, the percentage split however would remain the same with 55% market homes (45% open market sale, 10% private rent) and 45% affordable housing (social rent 17.5%, intermediate - Homes for Wells 17.5%, shared ownership 10%).

The revised figures have taken on board comments from the Strategic Housing team, by including Shared Ownership instead of First Homes and includes details on the proposed provider. The site plan includes indicative details on the breakdown of housing to include 8 x 1 bed, 7 x 2 bed and 5 x 3 bed. The mix is considered suitable taking into account local need.

The Strategic Housing team have provided updated comments on the revised proposals;

Changes in Numbers of Dwellings

There is unmet housing need/demand in the district so the reduction in the number of dwellings is disappointing. However, I understand that this is to address concerns raised by other consultees. I am pleased that the Holkham Estate has retained 45% affordable homes and reduced the numbers of market homes in proportion.

Intermediate Rent

Armstrong Rigg confirm that a Registered Provider, possibly Homes for Wells, will take the Intermediate Rent homes. This is important as it gives certainty that these homes will be available in perpetuity and at rents that meet the Homes England Rent Standard. The Council will include the Intermediate Rent homes as part of the s106 agreement alongside the affordable rent and shared ownership homes.

Shared Ownership

I am pleased that the Holkham Estate has replaced the five First Homes with five shared ownership homes. The Strategic Housing team believe that shared ownership is a more flexible and affordable form of low-cost home ownership.

Updated Housing Need

Housing need changes gradually over time and I set out below the latest information on housing need in Wells.

As at 16th January 2024 there are 950 households on the Council’s housing list who want to live in Wells, of these 166 are in the highest priority bands 1*, 1 and 2. Most of the need is for one-bed homes – 42.2%, with the remainder split between two-bed - 25.3%, three-bed – 22.3% and four+-bed – 10.2%.

Summary

In consequence of the changes listed above The Strategic Housing team supports the proposed development.

3. Residential Amenity

Policy EN 4 of the North Norfolk Core Strategy states that proposals should not have a significantly detrimental effect on the residential amenity or nearby occupiers. Paragraph 135 of the NPPF states that developments should create places with a high standard of amenity for existing and future users.

Paragraph 3.3.10 of the North Norfolk Design Guide states that residents should have the right to adequate privacy levels and that new development should not lead to any overbearing impacts upon existing dwellings. Existing residents should also be kept free from excessive noise and unwanted social contact. The table below provides guidance for conventional single and two-storey dwellings (assuming a level site situation) which would help to ensure a degree of privacy between adjacent properties is achieved.

Primary to	Primary	21.0m
	Secondary	18.0m
	Tertiary	12.0m
	Blank	11.0m
Secondary to	Secondary	15.0m
	Tertiary	9.0m
	Blank	8.5m
Tertiary to	Tertiary	3.0m
	Blank	2.5m

*Primary: having main windows to living rooms.
 Secondary: having windows to bedrooms, kitchens, dining rooms and secondary windows to living rooms.
 Tertiary: having windows to bathrooms, utility rooms, staircases and landings.
 Blank: elevations with no windows.*

Where there are differences in site levels, or in the case of larger buildings such as blocks of flats, these distances should be increased by 3 m for each additional storey (or equivalent). Paragraph 3.3.11 sets out examples where it may be appropriate to apply a flexible approach to this guidance, these include matters relating to design and character.

Policy EN 4 of the Core Strategy states that new dwellings should provide acceptable residential amenity.

Paragraph 3.3.9 of the North Norfolk Design Guide states that dwellings should include refuse disposal and recycling storage facilities, drying areas and access to outdoor amenity space. Internally, dwellings should have not less than 20 square metres of habitable floor area.

Paragraph 3.3.10 states that private garden areas should be of adequate size and shape to serve their intended purpose. They should be substantially free from shading and are recommended to be of an area equal or greater than the footprint of the dwelling they serve.

The existing properties to the south benefit from considerably long rear gardens, with a 4.5m private access lane to the back of the properties leading to Bases Lane. The distances to the backs of these properties from the indicative plans shows these would be distanced by at least 60m. The existing properties to the east on Bases Lane also benefit from large gardens, the back to back distances to these would be less at 30m (less for the flat plots 34-37 but this would be a side elevation, distanced at around 25m from the rear elevation, this would be close to the boundary so fenestration should be avoided on this elevation elevation). The depths of the rear gardens in these areas are broadly around 10m, the distances shown and distances to neighbouring dwellings adjacent to the site appear reasonable. Careful consideration would need to be taken regarding private amenity spaces for the dwellings on the site, ensuring sufficient sizes commensurate with the size of the dwellings, and ensuring sufficient separation between the proposed dwellings within the site regarding window distances and depth of gardens. Additionally sufficient amenity areas should be provided for the flats.

4. Impact on Landscape Character, including the Norfolk Coast Area of Outstanding Natural Beauty (AONB) and undeveloped coast

Core Strategy Policies

Policy SS 4 states that all development proposals will contribute to the delivery of sustainable development, ensuring protection and enhancement of natural and built environmental assets and geodiversity. Open spaces will be protected from harm, and the restoration, enhancement, expansion and linking of these areas to create green networks will be encouraged. New development will incorporate open space and high quality landscaping to provide attractive, beneficial environments for occupants and wildlife and contribute to a network of green spaces. Where there is no conflict with biodiversity interests, the quiet enjoyment and use of the natural environment will be encouraged and all proposals should seek to increase public access to the countryside.

Policy EN 1 relates to the Norfolk Coast Area of Outstanding Natural Beauty (AONB) and The Broads. The policy states that the impact of individual proposals, and their cumulative effect, on the Norfolk Coast AONB, The Broads and their settings, will be carefully assessed. Development will be permitted where it;

- is appropriate to the economic, social and environmental well-being of the area or is desirable
- for the understanding and enjoyment of the area;
- does not detract from the special qualities of the Norfolk Coast AONB or The Broads; and seeks to facilitate delivery of the Norfolk Coast AONB management plan objectives.

Policy EN 2 states that proposals should be informed by, and be sympathetic to, the distinctive character areas identified in the North Norfolk Landscape Character Assessment and features identified in relevant settlement character studies. Development proposals should demonstrate that their location, scale, design and materials will protect, conserve and, where possible, enhance:

- the special qualities and local distinctiveness of the area (including its historical, biodiversity and cultural character)
- gaps between settlements, and their landscape setting
- distinctive settlement character

- the pattern of distinctive landscape features, such as watercourses, woodland, trees and field boundaries, and their function as ecological corridors for dispersal of wildlife
- visually sensitive skylines, hillsides, seascapes, valley sides and geological features
- nocturnal character
- the setting of, and views from, Conservation Areas and Historic Parks and Gardens.
- the defined Setting of Sheringham Park, as shown on the Proposals Map.

The site lies within Undeveloped Coast as defined in Local Plan Policy EN 3. This policy states that 'only development that can be demonstrated to require a coastal location and that will not be significantly detrimental to the open coastal character will be permitted'. Para. 3.3.10 explains that this designation is designed to minimise the wider impact of general development, additional transport and light pollution on the distinctive coastal area.

National Planning Policy Framework (NPPF)

Paragraph 180 states that development should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and recognising the intrinsic character and beauty of the countryside. This paragraph also states that development should maintain the character of the undeveloped coast, while improving public access to it where appropriate.

Paragraph 182 states that great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues.

Paragraph 183 sets out that when considering applications for developments within Areas of Outstanding Natural Beauty, permission should be refused for major development other than within exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated

the accompanying footnote (64) sets out it is for the decision maker to consider whether a proposal is 'major development', taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined. For the avoidance of doubt the Local Planning Authority would consider this to be major development in this context, taking into account the nature, scale and setting and potential impacts on the wider landscape. As the proposed development would constitute major development under paragraph 183 of the NPPF, any full application would require a robust assessment of the three associated criteria under paragraph 183.

Impact on the landscape

The Landscape and Visual Impact Assessment: Initial appraisal: Key landscape and visual receptors (The Landscape Partnership, 10th Feb 2023) provides valuable information early in the design process to establish the baseline resource and inform appropriate layout and mitigation. The study identifies the prominent sloping topography of the existing agricultural field and existing boundary vegetation as key landscape features of the site.

The development would result in a significant change of land use from a parcel of agricultural land linked to other adjoining fields to an extension of the settlement. The effect would be adverse as stated in the LVIA. There may be potential for this to be mitigated to a degree through careful design of built form and a robust landscape framework filtering throughout the site, not just on the site boundaries.

The site lies with the Rolling Open Farmland Landscape Type (as defined in the North Norfolk Landscape Character Assessment (2021 SPD) and the Norfolk Coast AONB Integrated Landscape Guidance. The open coastal setting of Wells contrasting with the contained form of the settlement is noted as a Key Characteristic of this Type. The many characteristic mature trees (largely holm oak) and green spaces within the compact built settlement are also notable features. The impact of the proposed development on this defined landscape setting of the town within the AONB will be a key matter for consideration under Local Plan Policies EN 1, EN 2 and para 182 and 183 of the NPPF.

Key views are identified within the LVIA to inform appropriate landscape mitigation. Important views are gained from the north (from Beach Road and public rights of way, Wells FP28 and Holkham FP1) from where the receptor can appreciate the form of the settlement within its expansive landscape setting. The proposed development should appear as a natural extension to the settlement, with the mass of the 47 dwellings moderated by strategically placed planting within and around the site and variation in built form, layout and materials. The aim should not be to screen out the scheme, but to assimilate it into the agricultural field pattern landscape, so that it does not appear as a jarring development extending out from the town. There may be opportunities to reinforce field boundaries and add tree planting beyond the red line of the site within the wider landholding of the applicant to assist with this.

The roofscape should be varied in both profile, heights and materials to avoid a homogenous mass. Some single storey units would assist in breaking up the roofscape and assisting in filtering the development out into open countryside. The spine road extending straight through the site limits the opportunity for variation in building layout and the indicative layout is too regimented.

The recent development east of the site entrance (PF/17/2168) included a structural planting scheme that has not been implemented in full, as per Condition 5 of the decision (Preliminary Landscaping Scheme, Ian J M Cable, Dec 2017). This included 6 extra heavy standard holm oaks on the west boundary of the site, a group of 3 heavy standard Hornbeam and an extra heavy standard Stone Pine to the north of the turning area. Due to lack of soft landscape implementation, this site remains prominent within the designated landscape which was not the intention. Notwithstanding this pre-app enquiry, this matter should be passed to Enforcement to ensure it is remedied during the earliest available planting season.

External lighting in this elevated open setting has the potential to incur significant adverse landscape and visual impact on nocturnal character within the AONB and should be fully addressed in any full submission.

The amended and additional details received have responded to some of the feedback from the landscape section, including screen planting around the site and further trees on amenity strips throughout the development of larger canopy coverage. The additional tree planting filtered throughout the site would assist in better assimilating the proposed development into the landscape in the longer term. There would be a 6m buffer zone, with groups of trees,

hedging and scrub areas, to ensure a softened, natural boundary, which would again filter views towards the development.

A broad range of species selection has been selected, with larger canopy trees. The additional trees throughout the development is welcomed, and tree lined streets is strongly advocated under paragraph 136 of the NPPF. More trees would be encouraged where possible in the core part of the development. The majority of the trees are shown to be in amenity areas, to be maintained by a management company. This is also supported, as having the trees outside of the private curtilage areas of the properties should ensure their longevity by reducing the pressures/ability to fell.

The addition of bungalows around the site is particularly noted as beneficial in providing differentiation in scale reducing the massing of the built form from wider views towards the site. The precise number is unclear as the indicative site plan shows more than suggested in the supporting document. The locations of the bungalows, on the site plan are considered suitable and spread around the site. The differing scales is supported, at the application stage consideration of differing materials particularly roofing material would also be beneficial in addition to appropriate types. A materials schedule could be included with the application.

The access road has been realigned which has sought to address concerns over the straightness of this and located further east with additional planting of hedgerows and trees, which also assists in creating a more informal route to the site and reducing the more regimental appearance of the previously submitted straight road.

Details of landscaping to the north have been provided, with the footpath taking a sinuous route, with appropriate informal landscaping and the topography used in the design. There would be amenity spaces, and an area for play equipment is shown to the south by the development, this is considered appropriate, ensuing natural surveillance from the paths but also from the flats (no.14). As discussed, the land on Bases Lane is owned by the LPA. There is currently an informal path from Bases Lane through the hedge to the site, the plan shows this being retained. However, this should be upgraded to a more formal path to ensure an appropriate provision of accessibility to the site and open space provision from nearby residents (with Bases Lane specifically mentioned under criterion 5 of the allocation policy).

The landscape around Wells is sensitive with the AONB designations and policy protections from the undeveloped coast policy. However it is recognised that the council cannot currently demonstrate a 5 year housing supply, and this is allocated in the emerging plan to support the planned growth of the town. Subsequently, given this context its clear the development would require a location within the AONB and undeveloped coast designations. However it would need to be demonstrated that this would not detract from the special qualities of the landscape. From the indicative proposals put forward, the landscaping and design approach are considered suitable, and major development on this site could be effectively mitigated from detracting from the wider landscape.

5. Arboricultural impacts

The existing trees and hedges have been surveyed and a constraints plan produced, any full application should accompany a full Tree Protection Plan and Arboricultural Method Statement.

It is likely a small number of young trees internally to the site will need to be removed to facilitate the layout, replacement planting should be provided to mitigate this loss. Noting that trees make an important contribution to the character and quality of a site, any new streets should be tree-lined and trees should be integrated into the design.

A landscape plan should be provided detailing any new trees or hedges and describe appropriate measures to secure the establishment and long-term maintenance.

Elm features on the site, it is foreseeable these trees may require removal in the coming years. As an important feature of the site and boundary vegetation, a management plan should the Elm fail, be drawn up with replacement planting strategy including coastal tolerant species such as Whitebeam, pine, Sweet Chestnut, Holm Oak.

The existing boundary vegetation is important to retain and should be strengthened where possible. The hedge to the south is a mixture of species including privet, elm, box, any gaps in the boundary hedge should be planted up to provide a natural link to the surrounding land. The northern hedge shown on the site layout plan does not exist, planting in the location is welcome and should reinforce and compliment surrounding field boundaries softening the new suburban area.

Some areas of concern can be raised now around shading and liveability; Plots 11, 10 (Elm), Plot 1 (Sycamore, Holly, Elm) possibly Plots 7& 8, (Hawthorn, Ash) retaining larger trees on site including Sycamore trees is important and may require more formal protection.

6. Ecological Impacts

Core Strategy Policies

Policy EN 9 States that all development should protect the biodiversity value of land and buildings and minimise the fragmentation of habitats, maximise opportunities for restoration, enhancement and connection of natural habitats and incorporate beneficial biodiversity conservation features where appropriate. Proposals which cause a direct or indirect adverse effect to nationally designated sites, other designated areas or protected species will not be permitted unless:

- they cannot be located on alternative sites that would cause less or no harm;
- the benefits of the development clearly outweigh the impacts on the features of the site and the wider network of natural habitats; and
- prevention, mitigation and compensation measures are provided.

Development proposals that would be significantly detrimental to the nature conservation interests of nationally designated sites will not be permitted.

National Planning Policy Framework (NPPF)

Paragraph 180 states that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing sites of biodiversity value, minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Paragraph 186 states that when determining planning applications, significant harm to biodiversity should be avoided, adequately mitigated, or, as a last resort, compensated for. Should this not be possible, then permission should be refused. Development on land within

or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused unless there are wholly exceptional reasons. Opportunities to incorporate biodiversity improvement in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.

Impact on ecology

An application would need to be supported by a Preliminary Ecological Assessment to accord with the requirements of Policy EN 9 of the North Norfolk Core Strategy and provisions within the NPPF.

The pre-application information includes an Ecological Assessment report prepared by Hopkins Ecology (16 February 2023). The Landscape section consider the report to be broadly fit for the purpose of supporting a planning application should one be brought forward, although some report updates are likely to be required.

Section 6.15 discusses the merits of installing swift boxes (considered a 'universal' bird box due to being used by multiple species) as enhancements and suggests there would be a low likelihood of these being found and used by swifts. The volume of sightings/records found on the RSPB's Swift Mapper website suggest this would not be the case. Nesting has been recorded within 500m of the site with screaming parties and nesting attempts having taken place in the town annually since at least 2020. Therefore, in accordance with BS42021:2022, it would be considered appropriate for swift boxes/bricks to be incorporated into the development at one box/brick per suitable dwelling, which should preferably be sited in clusters of 3-5 bricks/boxes to improve uptake.

In summary, the Landscape section have no objections to the proposed development on ecological grounds in principle. Existing use of the site as paddocks provide habitats of low ecological value and limits the potential for protected species to be present. The primary issue for the development is ensuring the increase in recreational pressures upon nearby Habitats sites are sufficiently mitigated for.

GIRAMS

The in combination effects of residential and tourism growth in Norfolk as identified in the Norfolk Green Infrastructure and Recreational Avoidance and Mitigation Strategy (GIRAMS) will need to be assessed. This collaborative piece of work by Local Authorities in Norfolk has identified that in combination the growth identified as part of emerging Local Plan will have an adverse effect on the integrity of European Sites and a suite of strategic mitigation measures (identified in the GIRAMS) are required to mitigate for this impact.

The Shadow HRA identifies the proposed net gain of dwellings would trigger the requirement for financial contribution towards the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS). The developer contribution is currently set at £210.84 per dwelling and is index linked with inflation. However, further consideration will also need to be given to the potential for recreational impacts in isolation due to the number of dwellings proposed and the close proximity of, and ease of access to, the specified Habitats sites (c.535m to the north-east, or 600m by foot along the proposed access road to the north and the B1105). The provision of Enhanced Green Infrastructure onsite would help to contain the majority of recreational use within and around the site itself.

Further consideration of the Habitat Regulations Assessment process would be given during the course of any formal application, taking advice from Natural England, as well as the Council's Ecologist.

Net Gain

In line with the duties placed on the Council under the Natural Environment and Rural Communities Act 2006, along with the guidance and requirements set out within Policy EN 9 and paragraphs 180 and 185 of the NPPF, any formal planning application would need to demonstrate a biodiversity net gain.

On major applications, the Council would be required to secure Biodiversity Net Gain (BNG) of at least 10%. This would be evidenced through the submission of the most recent Biodiversity Metric (currently V3.1) spreadsheet completed by a suitably qualified ecologist and any necessary supporting documents and maps (e.g., of current baseline and proposed habitats, including habitat parcels and their sizes). Monitoring and management of any habitats created/enhanced would be required for a minimum 30-year period and secured via condition and/or a Section 106 agreement.

Enhancement measures will be required to provide a biodiversity net gain for the development as required by Paragraph 174 of the NPPF and CS Policy EN 9.

More details on this can be found on the link below;

[Biodiversity Net Gain FAQs - Frequently Asked Questions | Local Government Association](#)

7. Design and Layout and impact on the Conservation Area

Policy EN 4 states that all development will be of a high quality design and reinforce local distinctiveness. Design which fails to have regard to local context and does not preserve or enhance the character and quality of an area will not be acceptable. Proposals will be expected to have regard to the North Norfolk Design Guide, incorporate sustainable construction principles, make efficient use of land, be suitably designed within their context, retain important landscape and natural features and incorporate landscape enhancements, ensure appropriate scales, make clear distinctions between public and private spaces, create safe places, are accessible to all, incorporate footpaths and green links, ensure that parking is discreet and accessible and where possible, contain a mix of uses, buildings and landscaping.

The NPPF states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve, with good design a key aspect of sustainable development. Paragraph 135 goes on to state that development should establish or maintain a strong sense of place, be sympathetic to local character and history, landscape setting and be visually attractive. Paragraph 135 states that permission should be refused for development of poor design which fails to take opportunities available for improving the character and quality of an area, taking into account local design standards or guidance contained with SPDs.

The Wells Conservation Area is located to the northeast of the site. Policy EN 8 of the North Norfolk Core Strategy requires that development proposals, including alterations and extensions, should preserve or enhance the character and appearance of designated assets and their settings. Development that would have an adverse impact on their special historic or architectural interest will not be permitted.

The design and conservation officer does not consider the proposed scheme would particularly impact the designated heritage assets, as the dwellings would not block or impinge on any important or defining views into and out of the Conservation Area. There would be some views from Beach Road but the urban extension would not undermine or challenge the significance of the heritage asset. Impacts from urbanisation of the rural setting would likely be outweighed from the public benefits arising from the scheme

There were concerns over the originally submitted layout, which included a dominant main access road, the straightness of which limited the options for creating layering and visual interest. The overly regimented arrangement created the risk that such a development would appear unduly suburban rather than reflecting the informality and rurality of the surroundings. It was therefore recommended that there should be changes in the alignment of the main access road, and greater variation in the siting and arrangement of individual dwellings. It would be appropriate to introduce focal buildings to frame important views and have additive linked groupings which mix single and two-storeys forms to create evolving street scenes and distinctive character areas. The outbuildings could play a valuable transitional role in this. Hence, rather than just being detached domestic garages set back on their respective plots, these could actually link the building blocks together in less predictable and mutually supportive ways. This could also be helpful on the northern boundary where a series of repeating two-storey gables would potentially define the skyline.

Changes have been made to the road alignment through the site and at the access to Mill Road. There are more modest changes in the road layout within the site, which would facilitate more tree planting alters the dwelling arrangement to give the scheme a less regimented arrangement. As noted in the design and conservation officer comments more should be done to reduce the suburban arrangement, with focal points and considering the garaging arrangement etc.

Finally, in terms of illustrative building types shown, there are no overarching concerns raised in what has been submitted. Indeed, a blended mix of vernacular forms and materials and contemporary detailing seems entirely appropriate. However, as the submitted elevations have been taken from another scheme outside of our District, detailed comments must be reserved for when the actual elevations are in hand. The only comment to note at this stage is that some of the dwellings shown would rise some 9m above ground level and would therefore be quite imposing and assertive compositions individually. Cumulatively, however, one might reasonably question whether such a scale is appropriate given the higher ground. Perhaps the taller dwellings therefore need to be reserved for the southern side of the site whilst buildings of more cottagey proportions should predominate on the northern front.

The proposal, given the distance, context of the built form and separation and subject to appropriate landscaping and layout could be accommodated without negatively impacting designated heritage assets. The designs indicatively proposed are considered appropriate, though some concerns on heights have been raised, particularly towards the northern part of the site, however it is recognised these were illustrative. Full schematics should be provided at the application stage including streetscenes and illustrative plans towards the site to clearly show how the built form would sit on the wider landscape etc. The Design and Conservation officer notes the scheme is a significant urban edge extension, as such reserves judgement on the wider spatial impacts to the landscape team.

Designing Out Crime Officer

The comments from the Designing Out Crime Officer are noted (based on the original details), and broadly positive on the layout and make comments on what to include design wise to ensure sufficient surveillance on the site and parking areas and secured garden

areas etc to design out crime from such schemes. They have recommended that the footpath to Holkham Road and Bases Lane is not included as part of the proposal, but this is a key criteria of the allocation, and also important to connect and integrate the development with the surrounding built form, with permeability to encourage more active modes of transport to obtain services and facilities in the rest of Wells. The revised scheme does include more details on the open space to the north, with the play area to be to the southern end, close to the development, there will be some surveillance afforded to this space with the flats located to the northeast, but it is recognised opportunities to increase surveillance on this open space to the north would be limited and given the sensitive location in the landscape would need to be balanced against impact on this and the AONB, and promoting social interaction and more active modes of transport.

There is a formal path curving through the open space in a sinuous manner to Holkham Road. The informal path to Bases Lane is also shown, and indicated as remaining an unpaved path. The Local Authority owns the land adjacent to the site on Bases Lane, a more formalised path connecting to the proposed path should be included as part of the submission. This would be subject to discussions with the Council's property services team if this can be provided (and arrangement for providing this, be that providing a path up to the boundary or also across the councils land and included in the red line etc).

8. Open Space

Core Strategy Policy CT 2 states that on schemes of 10 or more dwellings where there is not sufficient capacity in infrastructure, services, community facilities or open space improvements which are necessary to make that development acceptable will be secured by planning conditions or obligations, and these must be provided within appropriate timescales.

The recently published National Model Design Code sets out that new development should contribute towards the creation of a network of green spaces and facilitate access to natural green space where possible.

In August 2020, the Council adopted the North Norfolk Open Space Assessment ([open-space-assessment-final.pdf \(north-norfolk.gov.uk\)](#)), a detailed study which provides the most up to date evidence of need, updated standards regarding the future provision of open space through developer contributions, and associated costs in line with the requirements of the National Planning Policy Framework (NPPF). It provides the justified evidence to support the requirement for open space contributions in Policy CT 2 of the Core Strategy.

Based on the mix of housing tenures, sizes and types shown within the submission, there would be an on-site requirement for amenity green space, play space for children and contributions for allotments, parks and recreation, play space (youth) and natural green space can be provided off site. The allocation and plans include 0.6ha open space area to the north to include a play equipment area, green space and recreational space, so as provision is being made on-site this would mean the financial contributions for these would not be required, but for the open space to be secured through a S106 agreement and details of the sizes of space and details of the equipment for the play space areas to be included in any submission.

Open Market Housing / Flats, Affordable Housing & Permanent mobile homes			Policy Compliance Position							
Number of dwellings	Enter number	Equivalent people	Open Space requirement	Required msq per person	Cost per msq	Total requirement (msq)	Cost of provision (£)	On site required?	Required quantity on site (msq)	
1 bed	8	10.4	Allotments	6	25.22	626.40	£15,798	0	None	
2 bed	14	25.2	Amenity Green Space	10	22.85	1,044.00	£23,855	Y	1,044.00	
3 bed	19	49.4	Parks & Recreation Grounds	11	104.91	1,148.40	£120,479	0	None	
4 bed	4	12.8	Play Space (Children)	1	190.49	104.40	£19,887	Y	104.40	
5 bed	2	6.6	Play Space (Youth)	0.6	129.06	62.64	£8,084	0	None	
TOTAL	47	104.4	Natural Green Space	15	22.84	1,566.00	£35,767	0	None	
				43.60		4,552	£223,871		1,148.40	

9. Highways and parking

Policy CT 5 (The Transport Impact of New Development) states that development will be designed to reduce the need to travel and to maximise the use of sustainable forms of transport appropriate to its particular location. Development proposals will be considered against the following criteria:

- the proposal provides for safe and convenient access on foot, cycle, public and private transport addressing the needs of all, including those with a disability;
- the proposal is capable of being served by safe access to the highway network without detriment to the amenity or character of the locality;
- outside designated settlement boundaries the proposal does not involve direct access on to a Principal Route, unless the type of development requires a Principal Route location.
- the expected nature and volume of traffic generated by the proposal could be accommodated by the existing road network without detriment to the amenity or character of the surrounding area or highway safety; and
- if the proposal would have significant transport implications, it is accompanied by a transport assessment, the coverage and detail of which reflects the scale of development and the extent of the transport implications, and also, for non-residential schemes, a travel plan.

Policy CT 6 (Parking Provision) states that adequate vehicle parking facilities will be provided by the developer to serve the needs of the proposed development. Development proposals should make provision for vehicle and cycle parking in accordance with the Council's parking standards, including provision for parking for people with disabilities.

Paragraph 108 of the NPPF sets out that transport issues should be considered from the earliest stages of development proposals so that, amongst other matters, the potential impacts of development on transport networks can be addressed, opportunities to promote walking, cycling and public transport use are identified and pursued, and the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.

Paragraph 109 of the NPPF states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and

emissions, and improve air quality and public health. It also recognises that transport solutions will vary between urban and rural areas.

Paragraph 114 states amongst other matters that development should ensure that appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location, and that safe and suitable access to the site can be achieved for all users.

Paragraph 115 sets out that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Paragraph 116 of the NPPF continues by setting out that development should give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and facilitate access to high quality public transport where possible. Development should also address the needs of all users, be safe, secure and attractive avoiding conflict between transport users, allow for efficient delivery/access and be designed to enable charging of ultra-low emission vehicles.

The Highways Authority have a separate charging process for pre-application advice requests. It is understood there have been separate dialogue with the County Highways department over the proposed scheme, road layout, and site access (including revising the access layout and bringing this closer east from the original details). Please note the scheme may require a transport statement as part of the application submission (clarification over such requirements may be provided through dialogue with the County Highways team).

Parking requirements

Parking guidelines are set out in Appendix C of the North Norfolk Core Strategy, and should be taken as the baseline requirements for the proposed parking provision, as per the details below;

Use Class	Car parking requirements (gross floor area unless stated otherwise)	Cycle parking requirements
Class C3: Dwelling Houses		
Use as a Dwelling House (whether or not as a sole or main residence)	Average of 1.5 spaces / 1 bedroom unit 2 spaces / unit for 2 or 3 bedroom unit min 3 spaces and max 4 spaces / unit for 4 or more bedroom unit (depending if double garage)	None for individual houses with garages or rear gardens for a garden shed. For flats and developments with communal parking: Residents: 1 space / unit Visitors: 1 space / 4 units

Refuse and Recycling

Any formal application will need to demonstrate that refuse collection vehicles which would be used in association with the development can enter, turn and exit the site in a safe and convenient way. Modelled vehicle tracking diagrams may be required in order to support of this information. The location of bin storage and collection areas will also be required. Details

relating to how on-site waste will be managed should be submitted and any management plans associated with this. Careful consideration should be given to ensuring that this is appropriate, having regard to carry distances, ventilation, accessibility and manoeuvrability etc. Details of how occupants would be expected to get refuse/ recycling to and refuse operators from, collection points will also be required, including surface types and gradients (where applicable). Further guidance of these matters can be found at <https://www.rbkc.gov.uk/pdf/BS5906-2005.pdf>

Further details were sought regarding refuse collection from private roads, with the councils guidance below;

Properties served by private road or street

The waste collection vehicle will service private roads or streets built to the standard of an adopted highway or road, and protected by a legal agreement which provides for future maintenance of the private road/ street. There must be clear and safe access for the vehicle to service the road. The waste collection vehicle will not service properties on private roads or streets that are not built to the standard of an adopted highway or road, or those not protected by a legal agreement which provides for future maintenance of the private road/ street.

N.B. Consideration needs to be given to providing a suitable bin collection point at the end of a private road should future refuse vehicle access be denied.

Properties served by a private drive

A private drive is a communal access serving no more than 8 properties. The waste collection vehicle will not access private drives and residents should therefore be made aware of the communal bin collection point nearest the highway. As a general rule this collection point should not be more than 5 meters from the position the vehicle will be stationary to proceed with collections.

10. Flooding and Drainage

Policy EN 10 of the Core Strategy states that the sequential test will be applied rigorously across North Norfolk and most new development should be located in Flood Risk Zone 1. A site-specific Flood Risk Assessment which takes account of future climate change must be submitted with appropriate planning applications in Flood Zones 2, 3a and 3b and for development proposals of 1 hectare or greater in Flood Zone 1.

As the proposal would be a major application a site-specific flood risk assessment should be provided in line with the requirements set out within Policy EN 10 of the Local Plan and Paragraph 173 (and footnote 55) of the NPPF.

The Lead Local Flood Authority advise that any development considers local flood risk, proposes sustainable drainage and complies with the National Planning Policy Framework (NPPF) to avoid the increase in the risk of flooding. Any planning should take account of national standards and guidance and at least one feasible proposal for the disposal of surface water drainage should be demonstrated and supported by the inclusion of appropriate information. Further guidance on sustainable drainage systems can be found on the Lead Local Flood Authority's website.

As the development would constitute 'major development' the Lead Local Flood Authority would provide comment as a statutory consultee on any formal planning application. Norfolk County Council, as the Lead Local Flood Authority provide a pre-application advice service

which is offered on a chargeable basis. Further information about this service can be found at the following link: [Information for developers - Norfolk County Council](#)

If there are works proposed that are likely to affect flows in an ordinary watercourse, then the applicant is likely to need the approval of the County Council. In line with good practice, the Council seeks to avoid culverting, and its consent for such works will not normally be granted except as a means of access. It should be noted that this approval is separate from the planning process.

11. Environmental Health

Policy EN 13 requires that all proposals should minimise, and where possible reduce, all emissions and other forms of pollution, including light and noise pollution, and ensure no deterioration in water quality. Proposals will only be permitted where, individually or cumulatively, there are no unacceptable impacts on:

- the natural environment and general amenity
- health and safety of the public
- air quality
- surface and groundwater quality
- land quality and condition, and
- the need for compliance with statutory environmental quality standards

Development proposals on contaminated land (or where there is a reason to suspect contamination) must include an assessment of the extent of contamination and any possible risks. Proposals will only be permitted where the land is, or is made, suitable for the proposed use.

The Environmental Health Department have commented the land does not show as being potentially contaminated on council records. At the application stage full details and confirmation / clarification would be required of the below;

- Domestic waste provisions and refuse collection area plans
- Any artificial lights installed, other than street lights (details the location and type)
- If ASHP's are to be installed; make, model, noise data and exact location of each unit will need to be supplied to assess for potential noise nuisance.
- Suggested construction hours - hours of noisy works should be restricted to 8am – 5pm Monday to Friday and 8am to 1pm on a Saturday. No noisy construction works to take place on Sundays or Bank Holidays.

12. Renewable Energy generation

Policy EN 6 states that new development will be required to demonstrate how it minimises resource and energy consumption and how it is located and designed to withstand the longer term impacts of climate change. All developments are encouraged to incorporate on site renewable and / or decentralised renewable or low carbon energy sources, and regard should be given to the North Norfolk Design Guide in consideration of the most appropriate technology for the site.

Although Policy EN 6 requires new dwellings to achieve at least a three-star rating (by 2010) and a four-star rating by 2013 under the Code for Sustainable Homes (CSH); the government, on 25 March 2015 issued a written ministerial statement withdrawing the CSH meaning that planning permissions can no longer require compliance with CSH standards. This Governmental position remains a material consideration in this case. In this respect,

some of the requirements of this policy are considered to be out of date, superseded by the Building Regulations.

Development proposals over 1000 square metres or 10 dwellings are required to include on-site renewable energy technology to provide for at least 10% (the scaling at 2013 onwards as set out within the policy is not pursued given the Governments withdrawal of the Code for Sustainable Homes in 2015) of predicted total energy usage. Such developments should be supported by an energy consumption statement.

The development of this site should demonstrate the above 10% on-site renewable energy generation requirement, whether this be via the use of solar panels, air source heat pumps or some other form of renewable energy technology. Appropriate supporting technical information should be provided to demonstrate that the requirements would be met. Details of how the means of construction and materials would aid with reducing energy use should also be submitted to help demonstrate compliance with this policy.

13. Mineral Safeguarding Area

The site falls within a Mineral Safeguarding Area and as such Norfolk County Council as the Minerals and Waste Authority would be consulted upon as part of any formal application. The site is underlain by Sand and Gravel, which would normally be exempt from the requirements of Policy CS16-safeguarding of the adopted Norfolk Minerals and Waste Core Strategy.

14. Planning Obligations

A number of planning obligations are likely to be required as a result of this development given its scale and nature. The full extent of these would be known once consideration of any formal submission has been given by the relevant consultees. The obligations required would need to be secured via a Section 106 legal agreement. At this stage it is likely that the following obligations would need to be secured via legal agreement in order to make the proposed development acceptable in planning terms:

- 45% affordable housing
- Open Space provision totalling £223,871 (minimum on site contribution of £43,742 would be required for the children's play space and amenity green space)
- GIRAMS Tariff Payment of £210.84 per dwelling = £9,909.48 plus additional on/off site green infrastructure as necessary to mitigate recreational pressures at protected sites. To be confirmed during consultation with Natural England as part of any formal submission.

Based on the original 51 (figures may change based on the revised numbers or any further revisions etc);

Education

There is spare capacity at Early Education and Primary school level. There is no spare capacity at Alderman Peel High school. Therefore, Norfolk County Council's Children's Services will be seeking Education developer contributions towards the provision or enhancement of educational facilities required because of the development in line with costs set out in the consultee response;

- Alderman Peel High School 6 (no. of places generated) x £15,664 (cost per pupil place) = £93,984

Healthcare

Norfolk and Waveney Integrated Care System (ICS) have provided comments (see consultee response for full details)

The proposed development is likely to have an impact on the services of Wells Health Centre as the main GP practice operating within the vicinity of the application site and the Burnham Surgery which services residents of Wells under its catchment area. Demand and Capacity information indicates that the GP practices are currently constrained or close to, and any available capacity will be absorbed quickly from the additional developments and population growth in the area.

The proposed dwellings for this development will have an impact on the services of local GP (General Practitioner) practices, Acute healthcare, Mental healthcare, Community healthcare and the Ambulance service operating within the vicinity of the application site.

A developer contribution will be required to assist mitigating the impacts of this proposal. The ICS Strategic Estates Workstream calculates the level of contributions required, in this instance to be £223,225, across the health sectors listed below.

Primary & Community Healthcare Provision	Total
Primary & Community Care Capital Cost	£62,357
Acute Care Capital Cost	£82,320
Mental Health capital Cost	£78,548

Other obligations;

- Library Service contribution of £75 per dwelling, totalling £3,825
- County Council S106 monitoring fee = £500 per obligation
- Provision of at least one fire hydrant on site

15. Other Matters

Pre-application consultation

In line with the Council's adopted Statement of Community Involvement, the developer is expected to undertake pre-submission consultation with the community, and relevant consultees and stakeholders as appropriate. The engagement and duration should be sufficient to gauge interest and opinion in the proposal and allow time to amend the proposals as appropriate. From the details submitted and during discussions, it is noted there has been ongoing engagement with interested parties, and revisions have been made taking these comments into account. These should be documented in a Statement of Community Engagement to be submitted with any formal application.

16. Summary

I trust the comments above are helpful and clearly set out the relevant policy requirements and likely material considerations for the proposed development. Further information to the proposals will be required as part of any formal submission as will have been noted. Should you proceed with a full planning application, the following documents and statements will be required in support:

- Completed application form and certificate of ownership
- Correct application fee
- Location Plans, red lines should extend to the public highways and should be to a recognisable scale, i.e. 1:1250, 1:2500 or 1:5000. North arrows should also be

shown. Land outside of the application site, but within the ownership of the applicants should be outlined in a blue line.

- Site Plans – These should again be at appropriate recognisable scales (1:500, 1:1250 etc.) and have north arrows. Both existing and proposed plans would be required. Surrounding development should be shown for context.
- Floor Plans, roof plans and elevations (1:50 or 1:100)
- Street scenes
- Materials schedule
- Design and Access Statement and heritage statement / Planning Statement
- Transport statement / travel plan
- Accessible and adaptable homes demonstration.
- Energy consumption statement demonstrating at least 10% of energy generation onsite via renewables etc.
- Site Specific Flood Risk Assessment and Drainage Strategy
- Affordable Housing Statement
- Landscape and Visual Impact Assessment
- Hard and Soft Landscaping Plans
- Arboricultural Surveys, Impact Assessments, Method Statements and Tree Protection Plans
- Lighting strategy and detailed scheme
- Ecological Impact Assessment
- Defra's Biodiversity Metric demonstrating net gains for biodiversity.
- Heads of terms for legal agreement covering the required planning obligations.
- Heads of terms for legal agreement

Date: 09 February 2024

Yours sincerely,

Mark Brands
Senior Planning Officer

Please be aware that the views contained within this letter are the preliminary views of an officer of the Council based on the information provided to the Local Planning Authority and is not a formal determination under Section 192 of the Town and Country Planning Act 1990. This advice is made without prejudice to any decision the Development Control Committee or the Planning and Development Manager may make on any application subsequently submitted, a site visit being undertaken and comments received in response to consultation and notifications.