



NORTH
NORFOLK
DISTRICT
COUNCIL

Development Committee

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TO REGISTER TO SPEAK PLEASE CALL 01263 516150

20 November 2018

A meeting of the **Development Committee** will be held in the **Council Chamber** at the Council Offices, Holt Road, Cromer on **Thursday 29 November 2018 at 9.30am.**

Coffee will be available for Members at 9.00am and 11.00am when there will be a short break in the meeting. A break of at least 30 minutes will be taken at 1.00pm if the meeting is still in session.

Any site inspections will take place on **Thursday 20 December 2018.**

PUBLIC SPEAKING – TELEPHONE REGISTRATION REQUIRED

Members of the public who wish to speak on applications are required to register by **9 am on Tuesday 27 November 2018** by telephoning **Customer Services on 01263 516150**. Please read the information on the procedure for public speaking on our website [here](#) or request a copy of "Have Your Say" from Customer Services.

Anyone attending this meeting may take photographs, film or audio-record the proceedings and report on the meeting. Anyone wishing to do so must inform the Chairman. If you are a member of the public and you wish to speak, please be aware that you may be filmed or photographed.

Emma Denny
Democratic Services Manager

To: Mrs S Arnold, Mrs A Claussen-Reynolds, Mrs A Fitch-Tillett, Mrs A Green, Mrs P Grove-Jones, Mr B Hannah, Mr N Lloyd, Mr N Pearce, Ms M Prior, Mr R Reynolds, Mr R Shepherd, Mr B Smith, Mrs V Uprichard, vacancy

Substitutes: Mr D Baker, Dr P Bütikofer, Mrs S Bütikofer, Mr N Coppack, Mrs J English, Mr T FitzPatrick, Mr V FitzPatrick, Mr S Hester, Mr M Knowles, Mrs B McGoun, Mrs J Oliver, Miss B Palmer, Mr J Punched, Mr J Rest, Mr P Rice, Mr E Seward, Mr S Shaw, Mr D Smith, Mr N Smith, Mrs L Walker, Ms K Ward, Mr A Yiasimi

All other Members of the Council for information.

Members of the Management Team, appropriate Officers, Press and Public



**If you have any special requirements in order
to attend this meeting, please let us know in advance**

If you would like any document in large print, audio, Braille, alternative format or in a different language please contact us

Heads of Paid Service: Nick Baker and Steve Blatch
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AGENDA

PLEASE NOTE: THE ORDER OF BUSINESS MAY BE CHANGED AT THE DISCRETION OF THE CHAIRMAN

PUBLIC BUSINESS

1. CHAIRMAN'S INTRODUCTIONS

2. TO RECEIVE APOLOGIES FOR ABSENCE AND DETAILS OF ANY SUBSTITUTE MEMBER(S)

3. MINUTES

To approve as a correct record the Minutes of a meeting of the Committee held on 1 November 2018.

4. ITEMS OF URGENT BUSINESS (to be taken under items 8 or 10 below)

(a) To determine any other items of business which the Chairman decides should be considered as a matter of urgency pursuant to Section 100B(4)(b) of the Local Government Act 1972.

(b) To consider any objections received to applications which the Head of Planning was authorised to determine at a previous meeting.

5. ORDER OF BUSINESS

(a) To consider any requests to defer determination of an application included in this agenda, so as to save any unnecessary waiting by members of the public attending for such applications.

(b) To determine the order of business for the meeting.

6. DECLARATIONS OF INTEREST

Members are asked at this stage to declare any interests that they may have in any of the following items on the agenda. The Code of Conduct for Members requires that declarations include the nature of the interest and whether it is a disclosable pecuniary interest.

7. OFFICERS' REPORT

ITEMS FOR DECISION

PLANNING APPLICATIONS

- (1) **WALCOTT - PF/18/1533 - Placement of up to 1.8 million cubic metres of sand to varying depths on the beach frontage covering an area north west of Bacton Gas Terminal to the south eastern extent of the settlement of Walcott. Provision of replacement combined surface and process water outfall and retention of gabion cliff protection at the Bacton Gas Terminal; Land between, north west of Bacton Gas Terminal and the south eastern extent of Walcott, Norfolk for North Norfolk District Council**

- (2) **BLAKENEY - PF/18/1263** - Demolition of existing dwelling and erection of single storey detached dwelling; 8 Wiveton Road, Blakeney, Holt, NR25 7NJ for Mr McIntyre
Page 25
(Appendix 2 – page 83)
- (3) **DILHAM - PF/18/0606** - Change of use from B1 light industrial to Sui Generis (car repairs) & erection of compound fence (part retrospective); Granary Works, Honing Road, Dilham, North Walsham, NR28 9PR for Mr Purkiss
Page 43
- (4) **OVERSTRAND - PF/18/1531** - Demolition of existing conservatory and erection of two storey side and rear extensions, single storey rear extension and front porch; 6 Thurst Road, Overstrand, Cromer, NR27 0PR for Mr Marshall
Page 50
- (5) **SMALLBURGH - PF/18/0464** - Erection of 2 two-storey dwellings, detached garage & new accesses; Smallburgh Hall, Hall Drive, Smallburgh, Norwich, NR12 9FW for Mr Coaley
Page 55
- (6) **APPLICATIONS RECOMMENDED FOR A SITE INSPECTION**
Page 65
- (7) **NEW APPEALS**
Page 65
- (8) **INQUIRIES AND HEARINGS - PROGRESS**
Page 65
- (9) **WRITTEN REPRESENTATIONS APPEALS - IN HAND**
Page 66
- (10) **APPEAL DECISIONS – RESULTS AND SUMMARIES**
Page 66
(Appendix 3 – page 162)
- (11) **COURT CASES – PROGRESS AND RESULTS**
Page 66
8. **ANY OTHER URGENT BUSINESS AT THE DISCRETION OF THE CHAIRMAN AND AS PREVIOUSLY DETERMINED UNDER ITEM 4 ABOVE**
9. **EXCLUSION OF PRESS AND PUBLIC**

To pass the following resolution, if necessary:-

“That under Section 100A(4) of the Local Government Act 1972 the press and public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A (as amended) to the Act.”

PRIVATE BUSINESS

10. **ANY OTHER URGENT EXEMPT BUSINESS AT THE DISCRETION OF THE CHAIRMAN AND AS PREVIOUSLY DETERMINED UNDER ITEM 4 ABOVE**
11. **TO CONSIDER ANY EXEMPT MATTERS ARISING FROM CONSIDERATION OF THE PUBLIC BUSINESS OF THE AGENDA**

**OFFICERS' REPORTS TO
DEVELOPMENT COMMITTEE - 29 NOVEMBER 2018**

Each report for decision on this Agenda shows the Officer responsible, the recommendation of the Head of Planning and in the case of private business the paragraph(s) of Schedule 12A to the Local Government Act 1972 under which it is considered exempt. None of the reports have financial, legal or policy implications save where indicated.

PUBLIC BUSINESS - ITEMS FOR DECISION

PLANNING APPLICATIONS

Note :- Recommendations for approval include a standard time limit condition as Condition No.1, unless otherwise stated.

- (1) **WALCOTT - PF/18/1533 - Placement of up to 1.8 million cubic metres of sand to varying depths on the beach frontage covering an area north west of Bacton Gas Terminal to the south eastern extent of the settlement of Walcott. Provision of replacement combined surface and process water outfall and retention of gabion cliff protection at the Bacton Gas Terminal; Land between, north west of Bacton Gas Terminal and the south eastern extent of Walcott, Norfolk for North Norfolk District Council**

Major Development

- Target Date: 03 January 2019

Case Officer: Miss S Hinchcliffe

Full Planning Permission

CONSTRAINTS

LDF - Coastal Erosion Constraint Area

LDF - Bacton Gas Terminal Buffer

LDF Tourism Asset Zone

LDF - Countryside

Undeveloped Coast

Area of Outstanding Natural Beauty

Site of Special Scientific Interest

Mineral Safeguard Area

Public Right of Way

Contaminated Land

Major Hazard Zone

SFRA - Flood Zone 3A

SFRA - Flood Zone 3B

SFRA - Flood Zone 2

SFRA - TDL 0.1% AEP + CC

SFRA - Risk of Flooding from Surface Water + CC

SFRA - Flood Warning Area

SFRA - Flood Alert Area

SFRA - Areas Susceptible to Groundwater Flooding

SFRA - Tidal 0.5% AEP +CC

Environment Agency Flood Zone 2

Environment Agency Flood Zone 3

EA Risk of Flooding from Surface Water 1 in 1000

EA Risk of Flooding from Surface Water 1 in 100

Coastal Erosion Risk Area - 100 years

Coastal Erosion Risk Area - 50 years

Coastal Erosion Risk Area - 20 years

RELEVANT PLANNING HISTORY for Land between, north west of Bacton Gas Terminal and the south eastern extent of Walcott, Norfolk

PLA/19760410 PF
COAST PROTECTION WORKS, BACTON
REMOVAL OF EXIST.GROYNES & FOR THE CONSTRUCTION OF NEW RE-
PLACEMENT SEA DEFENCE WORKS
Approved 21/06/1976

PLA/19761490 HR
BACTON GAS TERMINAL, PASTON ROAD, BACTON
REPAIRS TO DAMAGED CLIFF FACE
Approved 14/12/1976

PLA/19781587 QF
COAST PROTECTION WORKS, WALCOTT
RENEWAL OF GROYNES
Approved 14/11/1978

PLA/19821234 QF
BACTON AND WALCOTT, WALCOTT
COAST PROTECTION WORKS (SCHEME 821)
Approved 17/04/1983

PLA/19851411 PF
BACTON GAS TERMINAL, PASTON
REMEDIAL WORK ON CLIFF AND INSTALLATION OF DRAINAGE TO PREVENT
FURTHER EROSION
Approved 01/11/1985

PLA/19871208 QF
FORESHORE WALCOTT
COAST PROTECTION SCHEME
Approved 21/10/1987

PLA/19870314 PF
BEACH ADJOINING RED HOUSE, BACTON
CONCRETE RAMP FOR PERMANENT ACCESS TO BEACH
Approved 01/05/1987

PLA/19891066 PF
SHELL UK GAS RECEPTION & PROCESSING PLANT, PASTON ROAD, BACTON
20 METRE EXTENSION TO EXISTING GROUYNE AND LAND DRAIN INTO SEA
Approved 06/07/1989 AALL 31/08/1990

PLA/19990444 PF
SEAGULLS FIELD, PASTON ROAD, BACTON
REFURBISHMENT OF CLIFF FACE AND ALTERATION OF FIELD ACCESS
Approved 04/08/1999

PLA/20071001 PF
CLIFF FRONTING FIELD EAST OF GAS SITE, PASTON ROAD, BACTON
CONSTRUCTION OF ROCK REVETMENT
Approved 01/11/2007

PF/10/1033 PF
Land at Castaways Holiday Park, Paston Road, Bacton
Construction of replacement sea defences
Approved 26/10/2010

PF/14/1278 PF
Beach at Ostend, Walcott
Construction of 2 rock sill defences
Approved 28/11/2014

PF/15/0184 PF
Shell (UK) Ltd, Paston Road, Bacton, Norwich, NR12 0JE
Installation of replacement concrete ramp for access to beach and associated works
Approved 21/04/2015

PF/15/0680 PF
Rudram's Gap Timber Ramp, Keswick Road, Bacton
Erection of extension to existing access ramp
Approved 17/09/2015

PF/16/1359 PF
Beach in front of Shell (UK) Ltd, Paston Road, Bacton, Norwich, NR12 0JE
Construction of a temporary erosion protection structure on the beach, at the base of the cliff
Approved 18/11/2016

THE APPLICATION

Permission is sought to undertake engineering operations including the placement of up to 1.8 million cubic metres of sand along the coastal frontage north west of Bacton Gas Terminal (BGT) stretching 5.7km to Walcott.

Approximately 1 million cubic metres will be placed in front of the terminal at up to 7 metres above ordnance datum. In addition nourishment involving approximately 0.5 - 0.8 million cubic metres of sand, will take place in front of the villages of Bacton and Walcott, up to 4 to 5 metres above ordnance datum.

In addition three existing licence surface and process water flow outfall pipes from the terminal will be combined to create one 300 metre long outfall pipe with discharge out to sea.

Existing gabion cliff protection located on the beach frontage in front of the terminal and which has the benefit of a temporary consent until November 2019, is proposed to be retained indefinitely as part of this application.

This application for planning permission deals with all works as an engineering operation on land down to mean low water level. A separate application for a Marine Licence has been made to the Marine Management Organisation (MMO) for licensable activities below mean high water level.

The application was accompanied by the following documents:

- Location & Site Area Plans
- Beach cross sections
- Site Access & Parking Plan
- Combined Outfall Plans & Vent Pipe Details

- Planning Statement
- Environmental Statement
- Environmental Statement Non-Technical Summary

REASONS FOR REFERRAL TO COMMITTEE

North Norfolk District Council is the applicant and, due to the scale of the development, the proposal has been referred to the Development Committee for determination.

PARISH/TOWN COUNCIL

Bacton Parish Council - No response received.

Happisburgh Parish Council - Supports the application.

Mundesley Parish Council - Supports the application.

Paston Parish Council - No response received.

Walcott Parish Council - No response received.

Witton Parish Council - No response received.

PUBLICITY & REPRESENTATIONS

Due to the extent of the works a total of 12 planning/marine licence and EIA site notices were erected at the main beach access points from Mundesley to Walcott-Ostend Gap, with a 42-day consultation period. Many of the site notice locations corresponded with the location of Sandscaping information boards that had been previously erected by the applicant to inform the public of what the works would entail.

Two notices were placed in the local press.

No representations from members of the public have been received.

CONSULTATIONS

Marine Management Organisation - the MMO confirms its intent to defer an EIA consent decision under the Marine Works (Environmental Impact Assessment (EIA) Regulations 2007(as amended), on the basis that assessment of the effects of the project will be carried out by NNDC.

Environmental Health - No objections, subject to the development being carried out in accordance with the information provided within the Environmental Statement.

Environment Agency - No objection. Comments provided in relation to methodologies used within the Environmental Statement, environmental permitting and pollution prevention.

Natural England - No objection subject to appropriate mitigation being secured.

Royal Society for Protection of Birds - Do not object, however consider that the environmental performance of the proposals could be improved through addressing a list of issues raised, including minimising disturbance risks to breeding birds; monitoring foraging activity; and augmentation of proposed mitigation measures for breeding sand martins to ensure there are sufficient alternative sites.

Norfolk Coast Partnership - As the proposal is to put more sand on an existing beach there will be no adverse visual impacts on the AONB. Would support the installation of signage to alert locals and visitors of the work and why it is taking place.

Norfolk Wildlife Trust - No response received.

The Wash & North Norfolk Marine Partnership - No response received.

The Crown Estate - No response received.

Historic England - No objection in principle to the work but have identified that the application is likely to have an impact upon non-designated heritage assets. This is potentially both on the beach and in the areas from which the sand is sourced. Recommend that the applicant discuss the issues with Norfolk Historic Environment Service (at Norfolk County Council) and have suggested inclusion of a suitably worded condition for archaeological mitigation to ensure that the recording protocol takes into account both artefacts and buried deposits of interest.

Historic England have commented that the proposed onshore defence construction and offshore aggregate extraction have the potential to adversely impact the marine historic environment through physical works resulting in damage or destruction of known and potential heritage assets, as well as archaeological and palaeoenvironmental deposits. The works also have the potential to indirectly impact the historic environment outside the physical footprint of the works through changes in marine and coastal process and associated activities.

Norfolk Geodiversity Partnership - No response received.

Health and Safety Executive - Do not advise on safety grounds against the granting of planning permission (response from planning advice web app).

Norfolk County Council's Historic Environment Service – Have commented that mitigation measures in the form of an archaeological reporting protocol is an agreed appropriate approach and that a planning condition should be used to secure this programme of archaeological mitigatory work.

Norfolk County Council (Highway Authority) - No objection. Given all of the sand will be delivered by sea, the only vehicle movements during the construction phase are indicated as being associated with establishing a small site compound, deliveries of plant (5 deliveries per day) and daily employee movements (15-20 employees per day). The proposed vehicle access points have been assessed and it is agreed that the predicted traffic figures do not give rise to any highway safety issues.

Norfolk County Council Flood & Water Management (LLFA) – Comment that the National non-statutory technical standards for sustainable drainage systems (SuDS) state that where surface water will discharge to a surface water body that can accommodate uncontrolled surface water discharges without impact on flood risk e.g. the sea, then standards on peak flow control and volume control do not need to apply (standard S1). Hence all surface water from this development can be discharged uncontrolled in terms of flood risk, control of water quality will still be required. LLFA note that quantity and quality of the discharge will be regulated by the Environment Agency under an environmental permit.

LLFA have highlighted that whilst significant water quality requirements will be determined by the Environment Agency, the SuDS standards relating to flood risk to the development (S7, S8, S9), Structural Integrity (S10, S11), Designing for maintenance considerations (S12) and Construction (S13, S14) should be considered. If not, the flood risk to the site itself could increase by the change of outfall numbers (from 3 to 1), location and gradient. An assessment of coastal flood surge which may limit the positive outfall for several hours would also have to be considered and additional storage provided within the existing development to prevent flooding to critical infrastructure on the site e.g. utility plant or storage facilities.

LLFA assume that the maintenance of the drainage scheme will be by the applicant however, this should be clarified.

Norfolk County Council - Minerals & Waste - No response received.

Norfolk County Council Public Rights of Way – Comment that work has taken place to ensure a viable diversion to the Norfolk Coast Path around this scheme of works to be maintained for its duration and continued liaison with the PROW team would be expected throughout the duration of the works.

NNDC Landscape Officer – Some of the conclusions of the Environmental Statement are supported, while some conclusions are queried. Comments have been provided on the effects of the development on geological and ecological receptors based on the information provided within the Environmental Statement. Also an assessment has been carried out of the effects of the proposals on designated sites and protected species. These detailed comments are provided in full within **Appendix 1** of this report.

Great Yarmouth Borough Council - No response received.

Trinity House - No objections. If the existing outfall pipes remain and in situ then the current aid to navigation will need to be retained and maintained. If existing pipes are removed then the marking will be re-assessed for new outfall.

Eastern Inshore Fisheries & Conservation Authority - Comments provided in relation to marine licence. Works of this manner and scale are unprecedented in the Eastern IFCA district and therefore significant monitoring of the ecological and economic consequences of the works are warranted to inform future coastal defence strategies in the region.

Norfolk Little Tern Group - No response received.

Royal Yachting Association – Support the MMOs advice to provide appropriate communications via Notices to Mariners and therefore do not anticipate a significant impact on recreational boating.

Maritime & Coastguard Agency - No objections on the understanding that all maritime safety legislation is followed and risk mitigation measures are applied relating to the marine licence application.

North Norfolk Fishermen's Society – Comment that although they understand and empathise with the need to protect and preserve the coastline and all that entails (including people's homes and livelihoods as well as a large gas site), would like to take this opportunity to put forth concerns regarding the project:

- Have concerns for the environmental impact on the sand charge area inclusive of the habitats and lives of both sea and beach dwelling creatures and plant life. In the early 1960s, NNFS were instrumental with Eastern Sea Fisheries in putting in place a local byelaw to stop trawling across the grounds we work. This byelaw protected not only our livelihood over the years, but also the chalk shoal (MCZ).
- Another concern is that of the negative impact this could have on the Fisherman Society's ability to work in and around the area and therefore the impact on our livelihood. This concern comprises two main factors:

1. having to move out of the area mapped out in the project (this could result in greater costs from having to travel further in vessels to fish and the greater risk of the lives of fishermen who will have to travel further and therefore spend more time at sea. This will also result in the closing in on grounds already being fished by other members (the displacement impact);
2. the impact of the crabs/lobsters stocks Fisherman Society members currently fish for (as well as other sea dwelling creatures licences allow them to catch: fish), there is no way of telling if this project will have a devastating impact on the quantities of catch in the area for many, many years to come. NNFS has a proactive attitude towards conservation of the seabed, and is engaged with Eastern IFCA regarding measures that could possibly be introduced to help protect the environment in which Fisherman Society members work.

HUMAN RIGHTS IMPLICATIONS

It is considered that the proposed development may raise issues relevant to

Article 8: The Right to respect for private and family life.

Article 1 of the First Protocol: The right to peaceful enjoyment of possessions.

Having considered the likely impact on an individual's Human Rights, and the general interest of the public, approval of this application as recommended is considered to be justified, proportionate and in accordance with planning law.

CRIME AND DISORDER ACT 1998 - SECTION 17

The application raises no significant crime and disorder issues.

POLICIES

North Norfolk Core Strategy (Adopted September 2008):

Policy SS 2: Development in the Countryside (*prevents general development in the countryside with specific exceptions*).

Policy SS 4: Environment (*strategic approach to environmental issues*).

Policy SS 5: Economy (*strategic approach to economic issues*).

Policy EN 1: Norfolk Coast Area of Outstanding Natural Beauty and The Broads (*prevents developments which would be significantly detrimental to the areas and their setting*).

Policy EN 2: Protection and enhancement of landscape and settlement character (*specifies criteria that proposals should have regard to, including the Landscape Character Assessment*).

Policy EN 3: Undeveloped Coast (*prevents unnecessary development and specifies circumstances where development replacing that threatened by coastal erosion can be permitted*).

Policy EN 8: Protecting and enhancing the historic environment (*prevents insensitive development and specifies requirements relating to designated assets and other valuable buildings*).

Policy EN 9: Biodiversity and geology (*requires no adverse impact on designated nature conservation sites*).

Policy EN 10: Flood risk (*prevents inappropriate development in flood risk areas*).

Policy EN 11: Coastal erosion (*prevents development that would increase risk to life or significantly increase risk to property and prevents proposals that are likely to increase coastal erosion*).

Policy EN 13: Pollution and hazard prevention and minimisation (*minimises pollution and provides guidance on contaminated land and Major Hazard Zones*).

Kelling to Lowestoft Ness Shoreline Management Plan (SMP) 2012:

Policy 6.09 – Mundesley to Bacton Gas Terminal

Policy 6.10 – Bacton Gas Terminal

Policy 6.11 – Bacton, Walcott and Ostend

East Inshore and East Offshore Marine Plans 2014

National Planning Policy Framework (NPPF) 2018:

Section 14 – Meeting the challenge of climate change, flooding and coastal change

Section 15 – Conserving and enhancing the natural environment

Section 16 – Conserving and enhancing the historic environment

MAIN ISSUES FOR CONSIDERATION

- 1. Background**
- 2. Principle of Development including coastal erosion & coastal management**
- 3. Impacts on the Environment**
- 4. Impacts on Local Coastal Communities**
 - a. Access – walking, swimming, leisure activities
 - b. Protection
 - c. Disturbance
 - d. Air Quality
 - e. Issues of Wind Blown Sand
- 5. Impacts on the Local Economy**
 - f. Local Employment
 - g. Fishing
 - h. Tourism
- 6. Highways Impacts**
- 7. Material Considerations**
- 8. Environmental Impact Assessment and Habitat Regulation Assessment conclusions**

APPRAISAL

1. Background

Bacton Gas Terminal

Bacton Gas Terminal (BGT) is a major component of UK energy infrastructure and provides approximately 30% of the UK's gas supply and fulfils a key role in the import of gas via its interconnector site of international pipelines.

The terminal is located on top of soft cliffs of sand and clay and, despite the presence of several coast protection measures being in place, a storm in December 2013 resulted in the toe of this cliff receding by 5 – 10 metres with a resultant 2 - 3 metre loss of cliff line, increasing the threat from the sea to the terminal.

In addition, numerous pipelines buried beneath the beach are at risk of exposure and damage due to dropping beach levels. Measures are therefore considered to be required to protect the critical infrastructure of BGT.

Villages

The villages of Bacton and Walcott are located down-drift of BGT with a frontage which is also subject to coastal erosion. Over the last few years, beach levels have lowered resulting in an increase in flooding through wave overtopping.

The applicant has made an application using the Coastal Concordat to apply for both planning permission and a marine licence. This uses a single point of entry when making applications for the necessary consents. In this instance this resulted in a joint approach to the Environmental Impact Assessment Scoping to inform a single Environmental Statement required for both planning and marine licence purposes. Also, upon submission of the planning application and separately the marine licence to the Marine Management Organisation (MMO), a joint approach to publicity and consultation for the application was adopted with NNDC as Local Planning Authority coordinating the necessary publicity and acting as a single point of contact for consultation responses, which were duly shared with the MMO.

Due to the significant scale and the highly technical nature of the works, extensive consultation is understood to have taken place with stakeholders and interest groups over a number of years prior to the submission of the planning application and to inform a detailed Environmental Statement. As part of this process two public consultation drop in events were held in July 2017 seeking feedback from members of the public.

The two key objectives of the works are to provide protection to BGT and provide an increase in the level of protection to the down drift villages of Bacton and Walcott. The key is to determine the location and scale of sand placement to generate a range of benefits in terms of coast protection, amenity and tourism benefits.

Coast Protection Consent is not required as the scheme is being delivered by North Norfolk District Council which is a Coast Protection Authority as defined in the 1949 Coast Protection Act. Coast Protection Notification as detailed in the 1949 Act was completed without objection.

The Proposed Scheme

The works involve the placement of sand along a 5.7 km stretch of coast line between Bacton Gas Terminal and the south eastern end of Walcott. There are two elements of the proposals;

- i) Provision of a level of protection at the BGT frontage to prevent significant cliff erosion up to a storm event of 1 in 10,000 year probability, to provide protection from initial nourishment for a 15 to 20 year period.
 - Total volume of sediment use will be approximately 1 million cubic metres of sand,
 - a berm crest (limit of sand deposition) 7 metres above Ordnance Datum (AOD) compared to a beach height in front of the terminal at present of approximately 3.5 metres AOD,
 - maintaining a 20 metre wide berm at 7 metres AOD directly in front of the terminal,
 - crest width generally between 5 - 80 metres,
 - initial slope of 1 in 5 for the first 1 metre and then 1 in 15 further seaward until it meets the existing seabed,
 - combination of three existing outfall pipes from the terminal in to one and extension of the outfall pipe approximately 150 to 200 metres beyond the extent of the sand placement seaward in to the shallow subtidal zone. Beyond the extent of the sand placement footprint the pipeline would be trenched into the seabed, with a vertical vent pipe on the beach seaward of the point where the outfalls combine to release air build up in the pipeline as the tide rises. The outfall location will be marked with a navigation buoy. The redundant existing pipelines will be decommissioned and removed from

the site,

- Retention of existing gabion cliff protection located on the beach frontage in front of the terminal which currently has the benefit of a temporary consent until November 2019.
- ii) Additional protection in front of the villages from Bacton to Walcott from the south-eastern extent of the terminal to the end of the scheme at Walcott.
- Total volume of sediment 0.5 to 0.8 million cubic metres of sand,
 - A berm crest sloping down from 7 metres AOD at the southern end of BGT (end of BGT scheme) to 5 metres AOD then down to 4 metres AOD for most of its length,
 - Crest width between 5 – 27 metres,
 - initial slope of 1 in 5 for the first 1 metre and then 1 in 15 further seaward until it meets the existing seabed.

All of the above stated measurements are approximate as the exact volume of sand required and resultant beach levels are dependent on the natural beach levels at the time of placement. Sand of a similar or slightly coarser particle size will be used. The aim at the villages is to create a beach at high water (at least initially). The placed profiles mentioned will be affected by coastal processes very quickly and will rapidly adapt to natural conditions. The coast will still be subject to erosion even with the scheme in place and losses (in relatively high volumes at times) will still occur, however the beach profiles as a result of the landscaping will have been replenished to levels last experienced several decades ago and as a result there will be more sediment in the system to replenish any losses. Placement of sand will deplete overtime and spread both north-west and south-east.

Construction

The exact construction schedule is dependent on the contractor (a contractor for the works remains to be determined dependent on gaining the necessary permissions and consents).

Material will be extracted from an existing licensed aggregate extraction site and transported to site by a dredging vessel. The vessel will be stationed approximately 1 km from the beach and the material (a solution of sand and sea water) is then pumped on to the beach through a series of pipes which can be moved and extended as necessary from the main sunken feeder pipe from the vessel to the beach. Any anchoring of the feeder pipeline (which will remain in place for the whole duration of the works) will observe a 100 metre buffer zone of the chalk bed and any buffer required by BGT in relation to its pipelines.

For the purposes of modelling plume dispersion, a discharge rate from the vessel of 7,500 cubic metres per hour (assuming a 15,000 cubic metre capacity vessel) was used. This would result in the placement of 30,000 cubic metres of sand on the beach per day (over two tidal cycles). Placing an average 50 metres of sediment per day in front of the terminal and 300 metres per day in front of the villages.

Once on the beach the sand will be moved into place and profiled by land based plant (e.g bulldozers and 360 excavators) and with use of protective matting where necessary to protect existing infrastructure within the beach. Access to the beach by the construction plant will initially be from the beach access ramp at the terminal.

The whole project requires 24 hour working to reduce costs and the overall timescale for the project. Placement of sand on the beach is tidally restricted, requiring placement at high tide whenever this falls during the day or night, with essential works on the beach itself at this point to prevent losses straight back out to sea. Only essential works will be

undertaken on the beach at night due to safety restrictions. Profiling works on the beach will take place around low tide. As works progress along the coast it will be necessary for sections of beach to be closed while the works take place, for safety reasons and due to the initial instability of the sand solution. Alternative signed access routes will be provided where necessary. The sand placement part of the project could take between one and four months depending on weather conditions, contractor phasing programme and the number of vessels used.

Subject to securing the necessary permissions and consents works would likely take place over Spring and Summer 2019.

Cumulative impacts of the works together with any impacts from works associated with policies within the Shoreline Management Plan, Mundesley Coastal Management Scheme and works associated with landfall of the export cables for Norfolk Vanguard and Norfolk Boreas Off Shore Windfarms have been considered in detail within the Environmental Statement.

2. Principle of Development including coastal erosion & coastal management

The application site consists of a large area of coastal countryside designated as 'undeveloped coast' and is within a Coastal Erosion Constraint Area in which Core Strategy Policy SS 2 allows in principle coastal and flood protection works, Policy EN 3 permits development that can be demonstrated to require a coastal location and will not be significantly detrimental to open coastal character and Policy EN 11 seeks to restrict development in areas at risk of coastal erosion and only allows new development where it can be demonstrated that it will result in no increased risk to life or significant increase in risk to property.

Consideration of the planning history demonstrates that there has been an extensive and more recently a relatively frequent need to install and renew sea defences along this stretch of the coast. The existing defences comprise timber revetments which seek to reduce cliff erosion (located between 10 to 30 metres from the toe of the cliffs), with a series of groynes perpendicular to the revetment on the seaward side which seek to manage beach levels. To a lesser extent rock armour, sheet piling, use of sand filled geotextile bags and rock filled gabions have been used where needed along the coast. The area of beach itself acts as a natural defence against erosion by reducing water depth and absorbing incoming wave energy.

Despite defences being in place at the terminal frontage, beach lowering and cliff erosion has progressed rapidly over recent years. This has resulted in the placement of rock gabions and rebuilding of the beach access ramp required to protect the terminal infrastructure and maintain access from the terminal on to the beach for maintenance of the assets within the beach.

At the villages there is a concrete seawall structure in place along most of the frontage with timber revetments in some areas, supported by a timber groyne field. The beach here has eroded significantly since construction of the seawall in the 1950-60s to a point where the sea wall could now have a residual life of 5 – 15 years.

The national importance of BGT and the recognition of the threat of cliff erosion are identified in the Kelling Hard to Lowestoft Ness Shoreline Management Plan (SMP) which proposes to 'hold the line' and continue to protect the Bacton Gas Terminal site for as long as it is operational. It is however recognised that holding the line at the terminal will result in impacts on the coast to the south east and there will be a need to mitigate impacts on coastal processes that could impact on the villages down-drift.

The SMP suggests that at the villages of Bacton and Walcott, for the immediate future defences will be maintained as far as possible and while economically viable. However, beyond the short term (2025) the impact on the communities needs to be managed before the existing defences fail and in preparation for the long term policy option of managed realignment. Between Mundesley and BGT (to the north-west), the SMP policy up to and including the medium term is to 'hold the line'. Beyond this period the approach is also of managed realignment with existing revetments and groynes not maintained allowing beach sediment to move freely along the coast and ensuring nature conservation interests are satisfied.

In considering an approach to take forward which aligns with the Shoreline Management Plan it is important that any proposals do not impact upon the sediment supply along the coast and in particular to the south east which is critical in preventing accelerated erosion elsewhere. An Options Appraisal has explored the approaches that could be taken forward to limit erosion of the cliff frontage at BGT and prevent an increase in erosion to the cliffs adjacent to the terminal and considered factors such as cost, technical viability and potential environmental impacts.

The placement of sand on the beach frontage in front of BGT and the retention of existing gabion cliff protection in this location will clearly contribute towards the achievement of the SMP short, medium and long-term policy of hold the line at BGT. It is important however to mitigate any decreases in sand moving down drift due to stabilisation of the BGT frontage and increase the level of protection through the provision of an additional volume of sand to provide a buffer within the system and build up the beaches in the area. Sand placed in front of the terminal will feed down drift beaches, also sand placed directly on the beach in front of the villages of Bacton and Walcott will provide immediate benefits.

Between Bacton and Walcott, the policy beyond the short term is to allow the shoreline to return to natural processes and to allow natural coastal erosion through managed retreat. With the sand placement predicted to have effects on coastal processes and geology up to 40 years into the future, the sand engine would extend the short-term hold the line policy for longer, into the medium or even long-term, which is a change to the policy of the SMP in this area.

However, the SMP for this section of coast does allow for defence measures that temporarily slow, rather than halt, erosion if they can be economically justified and provided that they do not prevent the alongshore transport of beach sediment.

This requirement coupled with the SMP recommendation for BGT to undertake detailed studies exploring the viability and implications of alternative approaches to be taken in the future are considered to have been met by the proposed placement of sand under consideration here. The landscaping proposals (informed by extensive modelling) are considered by the applicant to incorporate mitigation for any potential loss of sediment supply down-drift as a result of protecting BGT and provides additional protection for the villages over and above that required under the SMP policies. All existing defence infrastructure will remain in situ in their current state and will be covered by the new sand until such a time that they become exposed again through natural erosion processes. The effect in terms of SMP policy will be that in the medium term greater protection to the villages will likely be provided through the slowing of erosion from current anticipated rates. This will buy more time to allow social and economic mitigation measures to be identified to minimise the impact on the lives of individuals and communities as the SMP requires, but this will not be at the expense of communities down drift due to the significant amounts of sediment being introduced to the system. The proposals when considered as a whole will be broadly consistent with the Shoreline Management Plan policies relevant to this section of coastline and therefore is also compliant with Policy EN 11 of the Core Strategy.

The East Inshore and East Offshore Marine Plans (April 2014) advocate the integration of town planning with marine planning, together with other types of regulation and management which may impact the marine area. Paragraph 250 and 251 links to Shoreline Management Plans to assess risks associated with coastal processes. In order to manage the risk of coastal erosion and flood risk management of areas, development should be compatible and integrated with the relevant SMP. This approach is also in line with the Marine Policy Statement and NPPF which also promotes the application of Integrated Coastal Zone Management to ensure effective alignment of terrestrial and marine planning regimes. As discussed above this application is considered to be broadly consistent with the relevant SMP (Kelling to Lowestoft Ness), and is therefore also considered to comply with the East Inshore and East Offshore Marine Plans.

The very specific nature of the coastal management works requires a coastal location and proposes a more natural approach to coastal management which will not be detrimental to the open coastal character. The proposals are therefore considered to comply with Core Strategy policies SS 2 and EN 3.

3. Impacts on the Environment

The proposals have the potential to impact on marine and terrestrial ecology and geological and geomorphological features and processes, some of which are protected through national and International legislation. The impacts of the proposals on these receptors have been assessed as part of the Environmental Statement in accordance with agreed Screening and Scoping under the EIA Regulations. The effects of the proposals are considered further below.

The effects broadly consist of increases in suspended sediment concentrations, deposition of material (both in suspension and through direct placement) and changes to coastal processes, resulting in direct and indirect impacts to geological features, habitats and species. Other effects of the development are associated with the transportation of material to the site and trenching of the combined outfall pipe.

No significant impacts on the environment have been identified through the Environmental Impact Assessment process. However, a number of negligible, minor adverse and moderate adverse impacts have been identified.

Of concern is the moderate adverse impact on the Mundesley Cliffs SSSI and Bacton Cliffs candidate County Geological Site, which could give rise to the site being downgraded from favourable to unfavourable condition as a result of a reduction in the rate of erosion of the cliffs and the loss of exposure for geological information recording. As a statutory consultee Natural England have advised that in order to make the development acceptable, appropriate mitigation consisting of recording and monitoring should be secured by condition.

The Environmental Statement concluded that the proposals would result in a moderate adverse impact on sand martins which nest within the soft cliffs at the nourishment zone. Mitigation incorporating pre-construction surveys and the use of netting to discourage nesting in the affected areas has been proposed (with alternative similar substrate available outside of the impacted areas), which would reduce the severity of this impact to minor.

Minor adverse impacts have been identified on terrestrial and marine habitats, marine mammals (as a result of disturbance from underwater noise and increased collision risk) and shallow subtidal benthic and fish species.

No other impacts have been identified on designated sites or protected species, including the Cromer Shoal Chalk Reef Marine Conservation Zone (MCZ).

Some minor to moderate adverse impacts on the environment have been identified and it is considered that these can be mitigated, reducing the impacts to an acceptable level.

Further to comments received from consultees including RSPB, Natural England, MMO and NNDC Landscape Officer, it is considered that any concerns raised by these bodies can, on balance, be adequately mitigated and are not sufficient to outweigh the significant public benefits associated with the scheme.

From a landscape and visual amenity perspective the placement of sand on to an already sandy beach is not expected to have a significant landscape or visual amenity impact overall. The sand will reach higher levels than is currently the case but this should not adversely change the visual appearance of the overall area. The greatest area of difference will be at the terminal frontage where the beach level initially will be 3.5 metres higher than the existing beach level. At the Walcott village end the beach will become roughly level with the promenade. Groynes and timber revetments will be mostly covered by the sand placement initially, which will give the beach a more natural appearance, as would have once been the case. The visual experience for local residents and tourists is subjective however for the majority of people the impact on the visual appearance of the area will be beneficial through enhancing the character, special qualities and distinctiveness of the local area, including the Norfolk Coast Area of Outstanding Natural Beauty (AONB) in accordance with Core Strategy policies EN 1, EN 2 and EN 4.

4. Impacts on Local Coastal Communities

Long term coastal change puts pressure on communities, infrastructure and businesses in the coastal zone.

Access

Over the short term, during the construction works there will be some disruption to residents who use the beach for leisure and recreation.

The Paston Way and England Coast Path passes along the beach in front of BGT (although it is subject to flooding at very high tides). A temporary footpath diversion will be provided during periods when it will be necessary to prevent beach access and will be arranged with the public rights of way/trails team at Norfolk County Council. Access will remain at the villages behind the beach along the seawall, with fewer temporary beach closures likely necessary due to the volume of sand placement in these areas. However, temporary closure may be necessary for safety reasons and appropriate measures will be put in place to manage any resultant impacts on access.

Direct access to parts of the beach will be restricted due to phased closures, which will give rise to short term inconvenience for other leisure users, with adjacent areas remaining open for use.

However, once the sand placement is complete there will be a much greater tidal access window to the beach along both the terminal frontage and the beach in front of the villages, where there will be a beach at high tide which should provide an increase in availability of the beach for all users. Access to the beach should also be greatly improved due to improvements in the height of the beach in relation to the bottom of existing steps down to the beach in front of the villages. With the particle size of the sand being placed on the beach proposed to be similar or slightly coarser than the existing sand, the actual sand experience to beach users should not be greatly different to existing, other than that the volume of sand will be greater.

As a whole the development is considered to comply with Core Strategy Policy EN 4 as it has regard to its local context and the provision of larger areas of sandy beach will enhance the character and quality of the area, providing benefit to its users.

Protection

The sensitivity of the local community to coast protection is high given the past overtopping and flooding issues that have been experienced by the local community in this area.

The sandscaping will increase beach levels and improve the life of existing defences and could delay seawall failure by between 15 and 50 years depending on the existing state of the sea wall and predicted beach development over time. This will reduce, in the short to medium term, the risk of loss of property due to erosion and, although not primarily designed for the purposes of flood prevention, will reduce flood risk due to overtopping to the coast road and a number of households. The sand placement will also delay the loss of the existing coastal defences, which will be buried and the higher beach level will add structural support to the sea wall and prevent its exposure to wave pressure and salt water.

The sandscaping will place more material in front of the caravan parks and villages to provide increased protection to these coastal assets. It is considered that there will be considerable benefits to the local community (villagers and caravan park owners) once the works are complete due to the increased coast protection function as a result of the higher beach levels.

The SMP identified that the sea defences at Bacton to the eastern end of Walcott (referred to as Ostend) will be maintained as long as economically viable, but this is not expected to be possible beyond the short term (around 2025). Before the sea defences fail, the impacts on the communities will need to be managed. The additional protection provided by this scheme for the villages and caravan parks therefore provides a considerable benefit to the local community and property owners. The proposals are considered to be broadly consistent with the SMP and compliant with Core Strategy policies EN 11 and EN 10.

Disturbance

Working at night time during the construction period is necessary to allow vessels to access the coast at both high tide periods, ensuring works are completed as quickly as possible. Only essential shore based works will take place at night. A minimal level of lighting is required for the safety of workers during operations at night.

A noise impact assessment formed part of the Environmental Statement and confirmed that the contractor would be required to adhere to the relevant British Standard Best Practice measures relating to noise and vibration control on construction sites with measures undertaken to limit and manage the impact of noise. Such measures relate to a large extent to proper maintenance, repair and training for operators of plant and machinery and providing information to local residents of the timing and duration of particularly noisy elements and a reporting mechanism for complaints in the event that disturbance due to noise occurs.

Noise, vibration and lighting issues (in particular during the night) during the construction period can be overcome by embedded mitigation measures such as minimising works on the beach overnight and reducing lighting near villages and caravan parks where possible with lighting focused on the beach area and away from the coastline. Minor adverse impacts as a result of night time noise will be experienced by some local residents and businesses. However, this will be a short term impact which, when considered in terms of the timescale of the construction period as a whole and the lifespan of the whole project, is considered to be an acceptable impact given the clear environmental benefits of the proposals and the

wider social and economic benefits of the sandscaping once complete. The proposals are therefore considered to comply with Core Strategy Policy EN 13 and subject to the imposition of conditions, will not give rise to significant unacceptable impacts on the natural environment and general amenity, health and safety of the public or give rise to unacceptable light or noise pollution.

Air Quality

The works are anticipated to be carried out using vessels with a capacity of approximately 15,000 cubic metres and approximately three large bulldozers and two 360° excavators. A dredger will make two trips per day to and from the aggregate extraction site. It is assumed that all contractor plant will be maintained in good working order in order to minimise emissions as required by Good Practice.

The duration of the works along the coastline varies, as more sediment is required on the frontage of the BGT and less further south towards the villages. The works around the BGT frontage will therefore be longer in duration as there is more sediment to deposit and profile. However, the overall duration of the works is expected to be approximately 4 – 8 months. Whilst the works will be carried out on a 24-hour basis, sediment will only be discharged at high water, and therefore there will be up to two discharges of sediment per day per vessel. The shore-side plant will be required for essential works as necessary at these times but the majority of the profiling work will be undertaken at and around low water and during the day. It is anticipated that the shore-side plant will operate for 4 to 6 hours per day, to profile the sediment.

Additional construction plant will be required for the construction of the combined outfall which will be used for a short duration (expected to be between three to four months). All deposited sediment will be wet; therefore, it is not anticipated that there will be any significant generation of nuisance dust during material handling activities.

Prevailing meteorological conditions in the UK are south-westerly winds, however, in a coastal location localised wind directions can vary and onshore breezes may occur. Pollutant emissions generated by dredgers and plant will generally be dispersed away from land and out to sea.

Given the above, and that background pollutant concentrations are well below the relevant Objectives within the study area, the relatively small scale and short duration of works, and the spatial distribution of the profiling activities, it is unlikely that the development would give rise to any significant air quality impacts on human or ecological receptors in the study area. It is therefore considered that air quality impacts are not significant and will not give rise to unacceptable impacts and comply with Core Strategy Policy EN 13.

Issues of Wind Blown Sand

The sand placement will constitute a new source for wind-blown sand in front of BGT and, to a lesser degree, the villages. Given the increased height of the beach in front of the terminal this will increase the potential for sand to be transported landward and over the top of the cliff, which could affect the functioning of the terminals infrastructure, in particular the filters in use in the terminal area.

Sand could also be blown over the seawall in the vicinity of the villages to the south, however the potential here is reduced due to the lower height of the beach in this location.

It is considered that wind-blown sand is only likely to be an issue during the initial stages of the scheme when the finer component of the sand is blown onshore. Following this, the finer component will have been removed and the coarser sediment will remain which is not so readily moved by wind.

One method that could be used to reduce the likelihood of wind-blown sand is to attempt to stabilise the sand in the berm area through planting of sand dune plants or placement of geotextiles or brashing. There are very small areas of dune vegetation established at the base of some of the cliffs. Planting of sand dune vegetation and increased stabilisation with brashings or geotextile could provide a more stable structure that could have greater longevity as a habitat.

Wind-blown sand levels will be monitored around the area of the terminal and villages and mitigation proposed if necessary to reduce excessive build-up of sand on filters at the terminal and on roads and gardens in the area. Such measures can be secured by planning conditions. Subject to conditions, the proposal will not give rise to unacceptable impacts and would comply with Core Strategy Policy EN 13.

5. Impacts on the Local Economy

Local Employment

The presence of BGT is critical for the regional and national economy as well as providing benefits for the local economy. The protection of BGT will ensure that this can continue and possibly grow. The NPPF paragraph 80 supports planning decisions which help to create conditions which allow businesses to invest, expand and adapt and these proposals to provide additional coastal protection to the terminal will provide the security required to allow the terminal to continue to invest, grow and continue to play an important role in UK energy supply.

BGT provides many hundreds of jobs and acts as a source of employment for local people, and in addition provides wider benefits through supporting a number of jobs in local businesses. Protection of the terminal and extending its safe operational life will help to safeguard those jobs and therefore the proposed works will provide significant benefits to the local economy in accordance with the strategic economic aims of Core Strategy Policy SS 5.

Fishing

It is recognised that both commercial and recreational fishing activities take place in the area. Consultation has taken place with local fishermen to inform the Environmental Statement. Impacts on these activities cover a wide range of potential effects, from disruption caused by vessel movements to and from the site, disruption in the inshore area due to construction activity, potential for sediment plumes to impact on fish/shellfish resources, changes to beach access for recreational fisheries and displacement of fishing activities in to other areas.

Considerations relevant to the planning application for commercial fishing relate to impacts within the intertidal area on the availability of fish/shellfish for the mainly smaller vessels operating in the area and any restrictions of fishing areas due to exclusion areas necessary during construction, although it is recognised that impacts wider than this can affect the livelihood of local fishermen.

It is understood that vessels operating in the area are likely launched elsewhere as it is understood that Bacton is only occasionally used as a launching beach. Several fishermen regularly use the Bacton to Walcott frontage which forms part of a very important fishing area with mainly potting used to target lobster, edible crabs and whelks, which together with a few other species such as Bass provides a vital resource for many fishermen in the area.

There is potential for both the construction of the combined outfall and sand placement activity to cause temporary restriction of access to fishing grounds adjacent to the scheme, which could indirectly affect the values of fish landings. Given the large amount of available

area for each type of fishing in the area and the limited fishing vessels using the area, it is anticipated in the regional context that the scheme would have a short term, minor adverse impact on regional catches due to potential exclusion from fishing grounds. However, it is recognised that for the local fishermen which rely on this area the loss of fishing grounds could cause a more significant loss of income at an individual level. In order to minimise direct disruption it is suggested that a liaison officer will be appointed to act as a point of contact for local fishermen and who will notify fishermen of the exact sand placement programming to allow equipment to be moved and alternative plans to be made in relation to the active working area at the time.

Increased sediment in suspension for limited periods when the sand placement activity is taking place within an intertidal zone which already experiences suspended sediment within a high energy wave environment is not considered to have a significant impact upon the abundance of the fish/shellfish species found within these areas which are either highly mobile or already tolerant to an environment of suspended sediment.

At Walcott localised hand bait digging for lugworm takes place within the intertidal zone and a change in lugworm abundance could have a significant impact on a small number of individuals in a localised area, but the impact on such populations in the wider area would be negligible. Recreational sea anglers use the beach targeting bass, dab and flounder and a small number of recreational fishing vessels occasionally launch from the beach at Bacton. Given the large area of beach available for each type of fishing, displacement due to exclusion from the beach will be a limited occurrence. The beach profile is unlikely to change significantly as a result of the works and would not be expected to be to the extent that access for launch of vessels or for beach based anglers would be impacted.

The North Norfolk Fishermen's Society have raised concerns relating to impacts on their costs and their lives as a result of travelling further to access fishing grounds and also concerns relating to the potential impact on fish stocks. These issues have been covered within the Environmental Statement, which concludes that when considering the variety of fishing impacts as identified above identified impacts are considered to be short term and temporary with sufficient alternatives available. A liaison officer will assist the coordination and provision of information to fishermen to allow impacts to be limited as much as is possible within these periods. Therefore the resultant impacts on the local fishing industry and this sector of the local economy should be minimised as much as possible so as not to be significantly detrimental.

Tourism

The presence of several caravan sites in the area shows the popularity of the area for tourism and recreation. There are also a small number of eating establishments and holiday lets close to the Bacton to Walcott frontage whose location benefits from proximity to the beach. Recreational activities understood to take place in this area include, walking, swimming, sailing, fishing, dog walking, kayaking, camping, surfing, meditation and general relaxing on the beach.

Over the short term, during the construction works there will be some disruption to people who are on holiday during this period and visiting the beach or staying at the caravan parks. Advance warning of the works would allow the caravan park/tourist accommodation owners to notify visitors of the works taking place. This may in turn result in a number of holiday makers choosing not to visit the area during these periods. Alternatively, whilst hard to quantify, this could be balanced by the potential that some construction workers may look to stay close to site and make use of local businesses and some holiday makers may be happy to watch the activities taking place on the beach.

Beyond the construction phase the scheme will greatly improve the level of beaches within the nourishment zone and the adjacent areas over time. Accessibility of the beach will be improved and the removal from view of the numerous man-made structures along the beach (at least in the short term) will improve the recreational and aesthetic quality of the area for local residents and visitors alike.

The increased physical protection that the scheme will provide to premises in the villages and in particular those located closest to the beach represents a significant benefit to those businesses and the local economy, without having a significant detrimental effect on the environment, in accordance with Core Strategy Policy SS 5.

6. Highways

All of the sediment to be placed on the beach will be delivered by sea, therefore the only vehicle movements during the construction phase will be associated with establishing a small site compound, deliveries of plant and daily employee movements to and from the onshore site compound.

It has been estimated that as a worst case, during the establishment of the site compound and delivery of plant there could be up to five deliveries per day (10 two-way movements). It should be noted that the HGV movements (required to deliver the plant for use during profiling of the material) represent an absolute worst case period that would occur for approximately two-three days at the start and end of the four to eight month project. Outside of these periods, HGV movements during the profiling would be limited to deliveries of fuel for plant, typically, less than one HGV per week.

Staff numbers for the construction phase would result in a peak of approximately 15 - 20 employees per day. Noting the limited options for walking, cycling and public transport as a worst case it has been assumed that all employees would drive themselves to the site compound each day, equivalent to a peak of 20 vehicle arrival and departures.

It is proposed that all HGVs would be required to follow the same delivery route as required for the construction works at the BGT, namely, the B1159 through Broomholm, Keswick and Walcott towards the A149. Following the approach adopted by construction works at BGT, HGV movements would not be permitted during school start and finish times (08:30 – 09:00 and 15:15 – 16:00).

With appropriate conditions to secure the identified highway management / mitigation works, the impact of the development on the local highway network would be acceptable and comply with Core Strategy Policies CT 5 and CT 6.

7. Other Material Considerations

Impact on Heritage Assets

Norfolk Historic Environment Service have advised that deposits of archaeological or geoarchaeological interest are understood to be sufficiently deeply-buried beneath the current beach area to remain unaffected by the proposed scheme (including the proposed outfall trenching works).

The eroding nature of the coastline means that the inter-tidal area of the proposed development largely comprises modern deposits with the potential for direct impact mostly relating to the remains of Second World War defences which have been displaced from their original position by coastal erosion and are now located in the inter-tidal zone of the proposed development area. The burial of these heritage assets will only constitute a negligible impact, however, there is potential for any remains that are partly exposed on the

beach to be damaged by terrestrial plant movements during the construction phase. Conditions are suggested by both Norfolk Historic Environment Service and Historic England to secure a programme of archaeological migratory work (a walkover survey and reporting protocol) to locate and report such assets prior to their covering with sand as required by paragraph 199 of the NPPF.

8. Environmental Impact Assessment and Habitat Regulation Assessment conclusions

The proposals fall under Schedule 2, 10 (m) coastal works to combat erosion and maritime works capable of altering the coast through sea defence works. An EIA Screening and Scoping request was submitted to both North Norfolk District Council (as Local Planning Authority) and the Marine Management Organisation (MMO) in July 2015 and a Scoping Opinion was provided in August 2016. As this preceded the date of the new Town and Country Planning (EIA) Regulations 2017 the application has been considered under the previous Town and Country Planning (EIA) Regulations 2011.

The scope of the EIA does not include the source of the sand to be used in the proposed scheme as this will come from an existing licensed aggregate extraction site and is subject to a separate assessment. However the transportation of the sand from the licensed site to the application site has been assessed as part of the EIA. The application for planning permission and a marine licence has been publicised in accordance with the requirements of;

- The Town and Country Planning Act 1990,
- The Town and Country Planning (Development Management Procedure) (England) Order 2015
- The Town and Country Planning (Environmental Impact Assessment) Regulations 2011
- The Marine and Coastal Access Act 2009
- The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended).

Responses from consultees are summarised within the consultations section of this report and are available in full on the North Norfolk District Council website under the planning reference PF/18/1533. No representations were received by members of the public.

The submitted Environmental Statement has not identified any significant environmental effects (major adverse effects) as a result of the proposed development. Mitigation has been proposed and will be secured by planning conditions to further reduce any minor environmental impacts.

Having considered the responses of the consultees, and through appraisal of the information contained within the Environmental Statement, the Local Planning Authority have reached a reasoned conclusion that the proposals will not give rise to significant environmental effects during either the construction or operational phases, either alone or in combination with other existing or approved projects and as such are compliant with the EIA Regulations.

As part of the coastal concordat the MMO and NNDC have jointly undertaken a Habitats Regulations Assessment (HRA) and concluded that there is no likely significant effect alone from the proposed project, or in-combination with other plans or projects. Natural England agree that the proposal is unlikely to have a significant effect on the interest features of Natura 2000 sites as concluded in the HRA.

9. Conclusions

The proposal offers a unique opportunity to address coastal erosion impacts affecting nationally significant infrastructure at the Bacton Gas Terminal site as well as an opportunity to broaden the positive impacts associated with such development to benefit adjoining coastal communities.

It is recognised that the landscaping works will have some short term adverse impacts during the construction phase in terms of disturbance to local residents and potential short term impacts on the local economy. However, in the medium to longer term, it is considered that the benefits of the proposal would be significant and in addition to the stated coastal protection benefits the proposals will also provide, amongst other things, improved access for local residents and greater tourism opportunities through the creation of sandy beaches resulting from the deposition of sand.

In addition, the identified public benefits of the proposal more than outweigh the relatively minor adverse impacts of the scheme on the environment.

Approval of the application would accord with currently adopted Planning Policy and the National Planning Policy Framework.

RECOMMENDATION: Approval subject to the imposition of appropriate conditions (as summarised below), including any other relevant conditions considered appropriate by the Head of Planning

- 1. Time limit for implementation**
- 2. In accordance with the submitted and approved plans**
- 3. In accordance with recommendations within Environmental Statement**
- 4. Pre-construction Archaeological Walkover Survey and Reporting Protocol**
- 5. Pre-construction survey of Mundesley and Bacton Cliffs by an appropriate geology specialist,**
- 6. Submission of an Environmental Management Plan (EMP) to include details of,**
 - A Construction Environmental Management Plan (CEMP)**
 - Phased Pre-construction surveys for nesting birds**
 - A Scheme of Geological Recording, Monitoring and Management in relation to Mundesley and Bacton Cliffs**
 - Anchoring strategy in relation to marine heritage assets if required**
 - Wind blown sand monitoring & mitigation if necessary**
 - Construction lighting details**
 - Appropriate measures (including planting) for sand stabilisation if required**
 - Details of Provision of a Local Liaison Officer (Fisheries & Local Community)**
 - HGV Routing details**
 - Footpath diversion details**
 - Signage – to provide information in relation to works & any necessary safety information**

- (2) **BLAKENEY - PF/18/1263 - Demolition of existing dwelling and erection of single storey detached dwelling; 8 Wiveton Road, Blakeney, Holt, NR25 7NJ for Mr McIntyre**

Minor Development

- Target Date: 06 September 2018

Case Officer: Miss J Medler

Full Planning Permission

CONSTRAINTS

Area of Outstanding Natural Beauty

Countryside

Conservation Area

Listed Building

Undeveloped Coast

RELEVANT PLANNING HISTORY for 8 Wiveton Road, Blakeney, Holt, NR25 7NJ

PO/14/0915 PO

The Rectory, Wiveton Road, Blakeney, Holt, NR25 7NJ

Conversion of residential dwelling to 3 affordable dwellings and erection of 1 residential dwelling

Withdrawn by Applicant 09/09/2014

PF/15/0722 HOU

8 Wiveton Road, Blakeney, Holt, NR25 7NJ

Creation of pond

Approved 16/07/2015

DE21/16/0098 ENQ

8 Wiveton Road, Blakeney, Holt, NR25 7NJ

Demolition of existing 6 bedroom dwelling and construction of new 4 bedroom dwelling
12/09/2016

PF/16/1417 PF

8 Wiveton Road, Blakeney, Holt, NR25 7NJ

Erection of replacement dwelling following demolition of existing dwelling

Approved 20/01/2017

IB/18/0771 IPA

8 Wiveton Road, Blakeney, Holt, NR25 7NJ

Proposed demolition of existing two storey building & erection of single storey replacement dwelling

Advice Given (for pre-apps) 04/07/2018

CDA/16/1417 CD

8 Wiveton Road, Blakeney, Holt, NR25 7NJ

Discharge of Condition 6 (external lighting) and Condition 7 (ecological mitigation and enhancement) of planning permission ref: PF/16/1417

Condition Discharge Reply 23/05/2018

CDB/16/1417 CD

8 Wiveton Road, Blakeney, Holt, NR25 7NJ

Discharge of Condition 11 (Landscaping) of Planning Application PF/16/1417

Condition Discharge Reply 16/07/2018

THE APPLICATION

Seeks the demolition of an existing 1920's 6 bedroom two storey detached house constructed with a pitched and hipped tiled roof, pebble dashed external walls and UPVC joinery; and the erection of a single storey, 4 bedroom replacement 'L' shaped dwelling partly on the footprint of the existing dwelling incorporating both traditional and contemporary finishes.

The proposed dwelling would have a ground floor footprint of approximately 311sq. metres.

The materials proposed are Corten Steel panels and knapped flint, with a Corten Steel and Sedum 'green roof' and pv panels.

The application site is located to the west of the Wiveton Road and is one of the first residential plots as you approach Blakeney from the south on Wiveton Road. The site is bounded on all four sides by mature hedgerows and trees. In views from the south, the roof and first floor of the existing house are visible, being the entrance to the village. Views from the north of the existing house are mostly obscured, with only glimpsed views of it offered through the trees.

The application is supported by plans showing the existing and proposed dwelling including scale comparisons, a Design and Access and Planning Statement, Heritage Impact Assessment, a Protected Species Survey (incorporating a Bat Survey) and an addendum to the Protected Species Survey, Arboricultural Impact Assessment and Landscaping Scheme.

All trees on the site are protected as they are within the Glaven Valley Conservation Area.

It is proposed that the development would utilise the existing access to the site.

REASONS FOR REFERRAL TO COMMITTEE

At the request of Councillor Ward given the planning history of the site which included a judicial review of the previously approved scheme.

PARISH COUNCIL

Blakeney Parish Council (First comments): Object to this application as the development is not in keeping with the village.

Blakeney Parish Council (Further comments): Expanding upon the previous comment, Blakeney Parish Council feels that the Design is not in-keeping and that the following apply:

- Policy EN4 Design - states that 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.
- Policy EN2 Protection and Enhancement of Landscape and Settlement Character - states that the development should be sympathetic to, the distinctive character areas identified in the North Norfolk Landscape Character Assessment etc. 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.

Wiveton Parish Council: No response

REPRESENTATIONS

6 letters of objection, including 1 from SAVE Britain's Heritage, and 1 comment from The Rectory Society have been received raising the following concerns (summarised):

- The proposal is not in compliance with multiple elements of NNDC's Local plan (notably policies EN2, EN4 and EN8 but also policies HO8, EN9 and EN14)
 - *NB there is no policy EN14*
- It would have a negative impact on the setting of the Blakeney Conservation Area (which is described in the draft Blakeney Conservation Area Appraisal)
- The impact of the application on the "look and feel" of Blakeney fails to respect the views of Blakeney residents as reflected in the draft Blakeney Neighbourhood Plan, and is evidenced by Blakeney Parish Council's opposition to the proposal, and the objections from Blakeney and other residents to the application.
- The former Rectory is an important part of the "look and feel" of Blakeney, makes a positive contribution to both the Blakeney and Glaven Valley Conservation Areas, and is an important, albeit undesignated, heritage asset (as has been demonstrated through extensive architectural heritage assessment conducted by Oliver Bradbury).
- The applicant's Heritage Impact Assessment contains inaccuracies and incorrect interpretations
- The proposed new dwelling is out of keeping with the village, and uses materials and design forms contrary to the conservation area principles. Its prominent location, in close proximity to St Nicholas' Church, the Old Rectory and its tithe barn, Blakeney Parish School and former school house, and the significantly enlarged footprint proposed, add to the significance of these points.
- Increase in footprint compared to existing will greatly magnify the perspective and impact when viewed from key public viewpoints
- Height of proposed dwelling would be higher than that which would be deemed to be for average single storey dwelling
- Inappropriate development
- Out of character with village due to its siting on a major route into village in close proximity to Grade I listed church
- If approved will just add another characterless 'blockhouse' to our local scenery
- Rusty steel cladding cannot be said to resemble the subtle soft textures of Norfolk Red brickwork or clay pantiles
- Corten is reported to be unsuitable for a hostile salt laden environment
- Run off rainwater from the cladding will leave permanent rust stains on the hard surface underneath
- Bland rectangular areas of flint fail to capture local vernacular, they are 'pastiche'
- Mirror panels should not be allowed, they are very damaging to wildlife particularly birds and reflected sunlight can be damaging to human health particularly eyes
- External lighting will be very intrusive and contrary to dark skies policy
- An ultra-modern house has no place in this part of the village
- Proposal is ugly
- Existing building is work of noted local architects Holtom and Page
- Existing building is an attractive structure of heritage value
- Proposal would cause harm to the setting of the surrounding listed buildings and longer views of the Conservation Area
- Corten steel out of place in this environment, especially in the context of it being a particularly sensitive site
- Existing building makes a positive contribution to the Conservation Area, and therefore efforts should be made to retain it
- An alternative approach to demolition should be taken by the applicant to retain the existing building and bring it back into beneficial use

In addition to the above points, a lengthy objection has been received from the immediate neighbour. For completeness and full clarity the 3 representations totalling 29 pages and the associated Architectural Appraisal of 50 pages have been appended to this report in full (see **Appendix 2**).

CONSULTATIONS

County Council (Highway): No objection subject to conditions.

Historic England: No comment.

Norfolk Coast Partnership: This new proposal will be much less visible in the landscape being one storey. We are also supportive of the consideration of reducing external lighting thus protecting dark skies in the AONB.

Conservation and Design Officer: No objection - The principle of the development on this site including the demolition of the New Rectory and its replacement with a contemporary dwelling has been established through planning application PF/16/1417 and the subsequent findings of the Judicial Review. Since this time, there have been no material changes to the heritage considerations relevant to the site, the existing dwelling or its setting.

C&D have no objection in principle to a contemporary style replacement dwelling on this site and remain of the opinion that the demolition of the New Rectory will not result in harm to the heritage assets in question (the designated Blakeney Conservation Area, the setting of the Grade II* Old Rectory site and the setting of the Grade I St Nicholas Church). At this stage, for clarity; the New Rectory is not considered to be a designated or non-designated heritage asset. The Council's adopted Local Listing Criteria was used to assess the New Rectory during the assessment of the previous application, and it was concluded that the building did not merit local listing primarily due to its failure to meet the 'Architectural Importance', 'Age' and 'Rarity' facets of this qualifying assessment.

In regards to the replacement dwelling, the form, scale, positioning and primary finishing treatments of the development remain unchanged since pre-application; however this full application has addressed C&D's concerns in relation to the prominence of the solar array and unbroken finishing treatment of the north elevation. The revisions have resulted in the array being mounted flush to the roofscape and therefore mitigating any visual presence from ground level. The north elevation has been broken through the introduction of a perforated cladded section, offering some variation within the corten theme.

The additional information received relating to the heritage significance of the New Rectory and the wider setting were considered at the time of the aforementioned application and this latest submission largely retraces the same territory without offering any substantive new material which would affect the planning balance as previously concluded. The Blakeney born architect John Page is once again mentioned as a key protagonist in the areas historic and architectural evolution which C&D would not dispute, however this link was made as part of the previous application and his local architectural connections were considered at this time. It is noted however that his works are not of any national notoriety, nor any of his local buildings listed with the exception of the war memorial. Further, the war memorial is listed for reasons exclusive of the architect.

The physical fabric of the building is in poor condition but not beyond meaningful repair. The New Rectory does portray hints of arts and crafts styling through its form, proportions and features, however the building is not a good example of this style within the regional or more local North Norfolk context. Whilst its architectural design is not without merit, the value and significance portrayed through its design and finishing treatments is modest and unexceptional. A number of unsympathetic later addition alterations e.g. fenestration and porch detailing further erode its architectural integrity and contribution to its setting.

C&D acknowledge the narrative between the four ecclesiastical buildings located along Wiveton Road namely St Nicholas Church, The School, The Old Rectory and New Rectory – however this historic association to a non-listed building does not carry any substantial weight in terms of the NPPF. As previous noted, the historic association might potentially be diluted or indeed eroded by the loss of the New Rectory in its current form, however a building will remain on the same footprint and occupy the same site. Paragraph 199 of the NPPF states that ‘the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted’. However, in this instance, this evidence of the association will remain in documentary form.

A draft Blakeney Conservation Area Appraisal is currently out to public consultation, the scope of this document includes identifying key views, boundary changes and the articulation of the Conservation Areas setting. Within this document, produced by independent heritage consultants Purcell, Local Listings for Blakeney have been proposed. The New Rectory does not feature within this list, and it should be noted that the New Rectory is not within the Blakeney Conservation Area boundary. In addition, the appraisal highlights the sites contribution as a ‘green arrival’ into the village. The replacement dwellings low lying nature will in fact further expose and reveal the bank of mature trees which provide the backdrop to the viewpoints on approach from the south. It could therefore be argued that the replacement dwelling will actively enhance this important approach to the village.

Notwithstanding the above and having balanced the information provided, C&D must conclude that the proposal represents no substantive grounds for refusal and the loss of the New Rectory and its replacement will not result in any harm. However, if it was argued that the erosion of the historic association between the structures along Wiveton Road and the introduction of a new non-vernacular palette of materials amounted to less than substantial harm, C&D would suggest that the public benefits of bringing the site back into use and the removal of a deteriorating property would outweigh this very low level harm in any case. This weighting could be further balanced by the economic benefits and social benefits of having the site in permanent residential occupation.

NPPF Para 190 requires the LPA to identify and assess the impact of the proposal on those heritage assets affected and their setting. Having considered all the relevant information received, the proposal carries no harm to the setting of the heritage assets identified above. Only filtered views of the site can be seen from the Old Rectory and the site cannot be seen from St Nicholas Church. The proposal will also reveal views of the sites verdant setting and green gateway. The historic association and land use considerations of a non-listed building of unexceptional quality can only carry limited weight within this assessment of setting and cannot be considered as key to the understanding or appreciation of the other ecclesiastical buildings along Wiveton Road.

NPPF Para 192 c) outlines the responsibility of the LPA to take account of new development contributing to local character and distinctiveness. The development will reveal more of the sites verdant qualities and offers a contemporary interpretation of those traditional materials seen within surrounding setting. C&D would suggest that the proposal has reacted to its context and knits effectively into the site.

If approved, conditions are required in relation to materials, joinery and rainwater goods.

Environmental Health: No objection. Advisory notes in relation to demolition of buildings and asbestos removal are required if approved.

Landscape Officer: No objection – There are no substantive objections to this proposal on grounds of landscape and visual impact. The proposal is considered to be compliant with the requirements of Local Plan Policies EN1, EN2, EN4 and HO8. Should this proposal go forward for approval, conditions will be required to secure all measures contained within the

AIA, procurement of an EPS Licence and other ecological mitigation measures laid out in the Protected Species Survey, along with replacement of plant failures, retention of trees, and retention of boundary hedges at minimum 2m.

HUMAN RIGHTS IMPLICATIONS

It is considered that the proposed development may raise issues relevant to

Article 8: The Right to respect for private and family life.

Article 1 of the First Protocol: The right to peaceful enjoyment of possessions.

Having considered the likely impact on an individual's Human Rights, and the general interest of the public, approval of this application as recommended is considered to be justified, proportionate and in accordance with planning law.

CRIME AND DISORDER ACT 1998 - SECTION 17

The application raises no significant crime and disorder issues.

POLICIES

North Norfolk Core Strategy (Adopted September 2008):

Policy SS 1: Spatial Strategy for North Norfolk

Policy SS2: Development in the Countryside

Policy HO 8: House extensions and replacement dwellings in the Countryside

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 4: Design

Policy EN 8: Protecting and enhancing the historic environment

Policy EN 9: Biodiversity and geology

Policy CT 5: The transport impact on new development

Policy CT 6: Parking provision

National Planning Policy Framework (NPPF) July 2018

The following broad sections are relevant to the application:

Section 2 – Achieving sustainable development – paragraph 10

Section 12 - Achieving well-designed places – paragraphs 127, 130 and 131

Section 15 - Conserving and enhancing the natural environment – paragraph 172

Section 16 - Conserving and enhancing the historic environment – paragraphs 193 to 197, 200 and 201

MAIN ISSUES FOR CONSIDERATION

1. Background
2. Principle of development
3. Design
4. Heritage
5. Landscape, Area of Outstanding Natural Beauty (AONB) and trees
6. Residential Amenity
7. Biodiversity
8. Parking and Highway Safety
9. Other Considerations

APPRAISAL

1. Background

This application follows the approval of planning application reference PF/16/1417 which granted permission for the demolition of the existing dwelling and erection of a replacement dwelling. That application was approved by the Development Committee at the meeting on

19 January 2017. Following that approval a Judicial Review of the decision was sought by a third party. The judgement given found in favour of North Norfolk District Council and the permission stands.

The applicant has discharged several conditions from the previous planning permission but is also seeking approval of this planning application as an alternative form of development. The applicant has confirmed that should this application be refused they will build the originally approved scheme.

2. Principle of development

The application site is located within an area designated as Countryside, as defined under Policy SS 2 of the adopted North Norfolk Core Strategy. Within this area, development should require a rural location and be for one of the types of development listed. One such type of development is the replacement of existing dwellings and whilst not explicit in the policy, it is considered that the replacement of the original dwelling should take place within the same curtilage, and not be in an alternative location. Therefore the rural location is justified and the proposal is considered to be acceptable in principle subject to compliance with Policy HO8: House Extensions and Replacement Dwellings in the Countryside, and other relevant Core Strategy policies.

With regard to replacement dwellings, Policy HO8 makes no reference to the need for the replacement dwelling to be sited on either the same footprint as the existing property or for it to be in close proximity. Instead, the policy concentrates on whether the replacement dwelling would result in a disproportionately large increase in the height or scale of the original dwelling, and whether it would materially increase the impact of the dwelling on the appearance of the surrounding landscape. In addition, the Policy makes allowances for extensions to the existing dwelling and the fact that the existing dwelling could be extended under Permitted Development Rights.

At present time the site is occupied by a two storey dwelling with an overall ground floor footprint of approximately 172 sq. metres including the garage. Under The Town and Country Planning (General Permitted Development) (England) Order 2015 a single storey extension of 68 sq. metres (17 metres x 4 metres) could be added to the rear of this property which would give a total ground floor footprint of approximately 240 sq. metres. The total floor area of the existing dwelling (ground and first floors cumulatively) is approximately 305 sq. metres (excluding any permitted development allowance). If permitted development allowances are added, this rises to approximately 373 sq. metres.

The ground floor footprint of the approved dwelling would be approximately 238sq metres, and total floor area (ground and first floors cumulatively) would be approximately 436sq. metres.

The total ground floor footprint of the proposed dwelling, being single storey, would be approximately 311 sq. metres.

In terms of total floor area the proposed dwelling would be 6sq. metres larger than the existing dwelling, but 62 sq. metres smaller if the permitted development allowance was included. It would also be 125 sq. metres smaller than the approved dwelling.

Schedule of Floor Areas (approximate)

<u>Existing Dwelling</u>	
Main House (GF)	145 sq. metres
Main House (FF)	133 sq. metres
Garage	27 sq. metres
TOTAL	305 sq. metres
Possible Extension under Permitted Development	
TOTAL AREA	<u>68 sq. metres</u>
<u>Approved Dwelling</u>	
Main House (GF)	126 sq. metres
Main House (FF)	198 sq. metres
Single Storey	72 sq. metres
Garage	40 sq. metres
TOTAL AREA	<u>436 sq. metres</u>
<u>Net increase in area between approved dwelling and existing dwelling including permitted development allowance</u>	
	<u>63 sq. metres</u>
<u>Proposed Dwelling</u>	
Main House (GF)	296 sq. metres
Plant Room/Store (GF)	15 sq. metres
TOTAL AREA	311 sq. metres
<u>Net increase in area compared to existing dwelling</u>	
	<u>6 sq. metres</u>
<u>Net decrease in area compared to existing dwelling including permitted development allowance</u>	
	<u>62 sq. metres</u>
<u>Net decrease in area compared to approved dwelling</u>	
	<u>125 sq. metres</u>

Whilst the total floor area of the proposed dwelling is 6 sq. metres larger than the existing dwelling, this is not considered to be a disproportionate increase. In addition, the total floor area of the proposed dwelling is smaller than that of both the existing dwelling, when taking into account permitted development allowances, and the approved dwelling.

In terms of overall ridge and eave heights, given the changes in ground levels on the site these measurements have been taken from the same overlapping point on the submitted plans for the existing, approved and proposed dwellings. These can be compared as follows:

Existing dwelling (north east corner)

- Main Chimney 11 metres (excluding pots)
- Two Secondary Chimneys 9 metres
- Main Ridge 8.5 metres
- Secondary Ridge 7.4 metres
- Eaves 5 metres
- Single Storey 3.4 metres

Approved dwelling (north elevation joint between flint tower and corten steel)

- Flint Tower – 9.2 metres
- Ridge to south of tower - 8.7 metres
- Ridge to west of tower – 8.1 metres
- Eaves 5.7 metres
- Single storey 3.45 metres

Proposed dwelling (northern elevation joint between flint work and corten steel)

- Flues - 5.5 metres
- Top of chimney – 4.5m
- Ridge – 4.4m
- Upper eaves – 4m
- Lower eaves – 3.2m

In any event, a condition will be attached to any permission if granted, to ascertain exact existing ground levels and proposed ground levels.

The proposed dwelling is single storey, and whilst it is accepted that this results in a need for a greater ground floor area, the height of the proposed dwelling would be approximately 3.8 – 4.8 metres lower in height than that of the ridge heights of both the existing and approved dwellings. It is not considered that the proposal would result in a disproportionately large increase in terms of its height and scale when compared to the original dwelling. In addition, and again, taking into consideration the single storey nature of the proposed dwelling, it is not considered the proposal would materially increase the impact of the dwelling on the appearance of the surrounding landscape.

It is considered that the proposal complies with the requirements and aims of Policies SS2 and HO8 of the adopted North Norfolk Core Strategy.

3. Design

Whilst the design of the proposed dwelling does not adhere strictly to the vernacular of the area, under Policy EN4 (Design) of the adopted North Norfolk Core Strategy, “innovative and energy efficient design” is encouraged”.

In addition, Paragraph 127 of the NPPF, in particular sub-paragraphs b) and c), state that decisions should ensure developments “are visually attractive as a result of good architecture, layout and appropriate and effective landscaping”, and that they “are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change”.

Paragraph 130 of the NPPF states that “where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development”.

Paragraph 131 of the NPPF states that “In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.”

In terms of the design and use of materials this would result in a ‘modern’ contribution to this sensitive setting. Although there are locally controversial elements to the scheme, in terms of the design, materials, impact on heritage assets and the wider landscape it is considered that the dwelling can be successfully and positively integrated into the site and wider landscape.

The overall scale and massing of the proposed dwelling is not considered to be excessive as explained above under section 2: Principle of Development. The proposal seeks a single storey dwelling of a 'modern' form. The external materials reflect both a traditional and contemporary finish with the use of knapped flint on all elevations of the part of the dwelling which contains the bedrooms (eastern part of dwelling), and Corten steel panels on the remainder of the dwelling (north, south and west elevations). The roofing is edged in Corten Steel with a central area of sedum to create a 'green roof'. Photo voltaic (PV) panels are also proposed on part of the roof. The flintwork and Corten Steel is broken up externally by the use of floor to ceiling height glazing panels, and windows.

It is considered that the extent of flint work proposed to the eastern part of the dwelling would ensure that the building would sit comfortably visually within its setting and would ensure the building is properly grounded on the site. The more contentious element to the scheme relates to the use of Corten steel cladding, which is clearly not a material used elsewhere within this predominately vernacular context. However, whilst its profile and finish will be a distinct move away from the traditional roof finish, the colour tone and weathering of the Corten references that of the terracotta roof and red brick wall tones of North Norfolk and is not therefore considered out of place in this location. A condition will be attached to any approval for full details of this material, to include information on how this will weather in a coastal area (as this has specifically been raised by objectors and through the previous judicial review).

In accordance with paragraph 2.2.16 of the North Norfolk Design Guide "New buildings do not have to copy their older neighbours in detail. Some of the most interesting streets include a variety of building styles, materials and forms of construction of many different periods, but which together form a harmonious group. All too often, however, people shy away from creating contemporary buildings for fear of them not be accepted locally. This results in pastiche buildings which simply revisit traditional architectural forms and motifs. There is a risk that this will deprive the District of real innovation and visual interest".

Paragraph 2.3.1 goes on to state that "Successful elevations respond to the materials seen on surrounding buildings. Note that this does not imply slavishly copying existing materials, rather it can involve creating interesting contrasts and textures between complimentary materials".

Further, paragraph 2.3.3 states that "Local distinctiveness is not about sameness and uniformity. It involves richness and variety in making a place special. Hence it is perfectly possible for things to be compatible and yet very different. Recognising this should enable us collectively to develop and evolve a contemporary interpretation of local vernacular styles for the 21st century".

As explained in the above paragraphs the North Norfolk Design Guide does not require new development to be of a traditional design or to copy other building designs or the materials used on them. In fact, the North Norfolk Design Guide and Policy EN4 positively encourages high quality innovative design as does the NPPF. Whilst Policy EN4 refers to new development reinforcing local distinctiveness and being suitably designed for the context in which it is set, this is not about sameness and uniformity. A new development can be both compatible and yet very different. Given that the proposed dwelling is single storey it is considered that the visual impact would be minimal. The proposed dwelling may have a greater footprint than the existing and approved dwellings, due to it being single storey in nature, but the overall floor area compared to the existing dwelling, when including permitted development allowance, and the approved dwelling is smaller. When compared directly with the existing dwelling it would be 6 sq. metres larger, but this is not considered to be disproportionate. The design, scale and massing of the proposed dwelling has been carefully

considered, and is welcomed on this site. It is considered that the dwelling can be successfully integrated into the site and the wider landscape. If approved it would secure a bespoke piece of contemporary architecture on a key approach to the village contributing towards achieving a higher quality modern design within the context of the historic landscape.

The proposal is therefore considered to comply with the aims of Policy EN4 of the Core Strategy and the NPPF in relation to design.

4. Heritage

The Development Committee is required by Sections 66 (1) and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (LBCA Act 1990) to have special regard to the desirability of preserving a Listed Building and its setting, or any features of special architectural or historic interest which it possesses and preserving or enhancing the character or appearance of a conservation area. The desirability of preserving listed buildings, their setting and character or appearance of conservation areas is not a mere material consideration to which appropriate planning weight can be attached, it is a legal obligation to have 'special regard' or pay 'special attention' to these matters. When a local authority finds that a proposed development would harm these matters, it must give that harm considerable importance and weight as a matter of law. There is effectively a statutory presumption against planning permission being granted where such harm arises. That presumption can, be balanced by other material considerations, including any wider public benefits of a proposal.

Development Committee should also take into account the advice contained within the National Planning Policy Framework (NPPF), which specifically addresses the need for conserving and enhancing the historic environment, in particular paragraph 193, which states:

'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'

Paragraphs 194 to 196 go on to set out the threshold for justification for substantial harm and less than substantial harm and when wider public benefits should be considered.

It is clear therefore, that considerable weight must therefore be given to the preservation of heritage assets including their setting.

In considering development proposals affecting heritage assets, Core Strategy Policy EN 8 sets out that *'Development that would have an adverse impact on...special historic or architectural interest will not be permitted'*. However, this element of Core Strategy Policy EN 8 is now out of step with the guidance set out in the NPPF which is more permissive towards allowing development affecting heritage assets but only where there are clear and convincing public benefits in favour, and in accordance with the statutory requirements set out above.

In terms of the heritage assets likely to be affected, it is important to assess whether, how and to what degree setting makes a contribution to their significance.

The NPPF defines setting of a heritage asset as the surroundings in which it is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, and

may affect the ability to appreciate the significance or may be neutral. Significance is defined as the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical presence, but also from its setting.

The heritage assets identified are the Glaven Valley Conservation Area, the Parish Church of St Nicholas (Grade I) and the Old Rectory (Grade II*). The New Rectory is not considered to be a designated or non-designated heritage asset. The Council's adopted Local Listing Criteria was used to assess the New Rectory during the assessment of the previous application, and it was concluded that the building did not merit local listing primarily due to its failure to meet the 'Architectural Importance', 'Age' and 'Rarity' facets of this qualifying assessment.

Glaven Valley Conservation Area

The application site is within the Glaven Valley Conservation Area. In accordance with Section 72 of the LBCA Act 1990, there is a duty to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area. There are a number of benefits to the scheme over the previously approved scheme in that, given the proposed design and single storey nature of the proposed dwelling, the building will be significantly less visible to the wider area. The draft Blakeney Conservation Area Appraisal (currently out to public consultation) highlights the sites contribution as a 'green arrival' into the village. The replacement dwelling's low lying nature will in fact further expose and reveal the bank of mature trees which provide the backdrop to the viewpoints on approach from the south, removing any glimpses of the existing building. It could therefore be argued that the replacement dwelling will preserve this important approach to the village.

It is therefore concluded that the loss of the New Rectory and the proposed replacement dwelling will result in no harm to the significance of the Glaven Valley conservation area.

St Nicholas Church, Blakeney (Grade I Listed)

The Church occupies a prominent position on the approach to Blakeney from both the A149 Coast Road and the Wiveton Road. The church sits at the top of a small rise in land and the land adjacent and to the east and south of the church site features a number of mature trees. In addition, when approaching from the east in a westerly direction, views of the church are limited to its two towers by the mature roadside hedge. The character of the surrounding area is mixed being rural, coastal and urban in nature. Blakeney marshes lie to the north, the settlement of Blakeney to the west and to the south is open countryside and agricultural land. St Nicholas' Church has a range of heritage values including aesthetic: It is an attractive feature on the entrance to the village, historical, architectural and communal (social). The generally unspoilt character of the surrounding area contributes positively to the setting of the church.

In terms of the relationship with the St Nicholas Church, there are no direct sightlines from the application site itself and St. Nicholas Church due to the combination of distance and existing woodland and trees. However, when approaching from the south west, the existing dwelling and St Nicholas Church can be viewed in combination in certain long distance views. These views are limited to those from the public highway and some rights of way, mainly through gaps in hedgerows and field accesses. St Nicholas Church is seen in the background against the backdrop of rising ground where the tower of the church is visible above the trees some distance to the north east. From this direction, given the distance involved, together with the scale, massing and materials proposed, it is not considered that the proposed dwelling would result in any harm on the setting of St Nicholas Church.

Old Rectory (Grade II*)

The narrative between the four ecclesiastical buildings located along Wiveton Road (namely St Nicholas Church, The School, The Old Rectory and New Rectory) is acknowledged,. As previously noted, the historic association might potentially be diluted or eroded to some extent by the loss of the New Rectory in its current form. Any loss is compensated by the new building which occupies the same site. Paragraph 199 of the NPPF states that ‘the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted’. However, in this instance, this evidence of the association will remain in documentary form.

Further, only filtered views of the site can be seen from Old Rectory and as such it is considered that the loss of the existing building will have no impact on the setting of this adjacent Grade II* listed building.

It is not considered that the loss of the existing building, and the erection of the replacement building, will harm either the setting of, or historical associations to, the Old Rectory.

The New Rectory (un-listed)

The physical fabric of the building is in poor condition but not beyond meaningful repair. The New Rectory does portray hints of arts and crafts styling through its form, proportions and features, however the building is not a good example of this style within the regional or more local North Norfolk context. Whilst its architectural design is not without merit, the value and significance portrayed through its design and finishing treatments is modest and unexceptional. A number of unsympathetic later addition alterations e.g. fenestration and porch detailing further erode its architectural integrity and contribution to its setting. This is not to say that the building is without merit, it has an interesting roof design, and the steep hipped roof and large chimney stacks provide some visual interest. However, it is not worthy of listing, or local listing, and makes little contribution to the area.

The main point of interest associated with this building, are its links to the surrounding built form, in terms of its associations with the Church and adjacent Old Rectory. These linkages are well documented, including in the architectural appraisal of the main objectors. The building itself is not required to realise these associations, and indeed a built form will remain on this site continuing the historic land use.

When considering the demolition of non-listed buildings Policy EN8 of the Core Strategy states that such a proposal “will be assessed against the contribution to the architectural or historic interest of the area made by that building”, and that “Buildings which make a positive contribution to the character or appearance of an area should be retained. Where a building makes little contribution to the area, consent for demolition will be given provided that, in appropriate cases, there are acceptable and detailed plans for any redevelopment or after use”.

Taking the above into consideration, it is considered that the loss of the existing building, which makes little contribution to the area, and the erection of a replacement building, would not result in harm to the setting of the adjacent listed buildings or conservation area. It is considered that the proposals would represent a preservation of the appearance of the Conservation Area. As such the proposals are considered to be in accordance with Core Strategy Policy EN 8 and S66 (1) and 72 of the LBCA Act 1990.

5. Landscape, Area Of Outstanding Natural Beauty (AONB) and trees

The site is located within a sensitive designated landscape, set both within the Norfolk Coast Area of Outstanding Natural Beauty (AONB) and the Glaven Valley Conservation Area, as well as directly adjacent to Blakeney Conservation Area. The site is also located within an area designated in the Core Strategy as Undeveloped Coast. The combination of elevated,

long landward views and the mosaic of a heathland landscape make the site and its surrounding environs typical of the feature landscapes of the AONB.

As identified in the North Norfolk Landscape Character Assessment (June 2009 SPD), the site lies within the Rolling Heaths and Arable Landscape Type (RHA1 Blakeney). It is the glacial geology which shapes the landscape character, dominated by Blakeney Esker and heathland and the nucleated settlement of Blakeney village. Located on the edge of the settlement, the existing dwelling is notable for marking the start of the built form of the village on the approach from the south.

Policy EN1 of the Core Strategy stipulates that development will be permitted where it does not detract from the special qualities of the AONB. Policy EN2 of the Core Strategy is influenced by both the North Norfolk District Council Landscape Character Assessment and the AONB Integrated Landscape Character Guidance, and states that development proposals should demonstrate that they will protect, conserve and where possible enhance the special qualities and local distinctiveness of the area.

The application has not been supported by a Landscape and Visual Impact Assessment (LVIA), and it was not considered reasonable to request such a document, given the location at the edge of the built up development, size and design of the new dwelling put forward. The proposal does not represent an extension of the built form into the countryside, as it is a replacement dwelling on an existing plot. Evidence provided within the Design and Access Statement demonstrates the visual impact of the proposed scheme from key viewpoints approaching from both long and short distance from Wiveton Road and the approach north from Blakeney. The application also includes comparative massing, floor space and height sketches between the existing and proposed dwelling. Objectors have raised concerns over the accuracy of this supporting information from key viewpoints. However, whilst Officers cannot vouch that the viewpoints are 100% accurate they provide an indication of how the proposed dwelling may look in the immediate and wider landscape. Officers are not relying on this supporting information alone to assess the visual impact of the proposal. The scaled plans and comparison of these to the existing and approved dwelling has provided the basis of this assessment. Given the scale and height of the proposed dwelling the visual impact in the wider landscape would be significantly reduced compared to that of the existing dwelling.

The majority of views of the existing dwelling in the immediate and wider landscape are from the south and south west of the site, where it is seen against the backdrop of mature trees. This group of trees is referred to in the Draft Blakeney Conservation Area Appraisal (August 2018), in paragraph 4.2.3. It states that "Views along Wiveton Road conversely present the viewer with a bank of trees marking the entrance to the village". The entrance to the village from the Wiveton Road is therefore characterised by the bank of mature trees rather than any built form. The replacement of the existing two storey dwelling with a single storey dwelling would therefore reduce the visual and landscape impact of the built form and would enhance this notable landscape feature. The trees and hedging along the southern and eastern boundaries of the application site are proposed to be enhanced which further mitigates against the reduced visual and landscape impact.

Photomontages have been submitted as part of the Design and Access Statement demonstrating the reduced visual impact in comparison to the existing and proposed dwellings. It is considered that the materials proposed would allow the proposed dwelling to assimilate into its surroundings. It is not therefore considered that the proposal could be considered as having an adverse landscape and visual impact.

Following the submission of an Arboricultural Impact Assessment it confirms that no trees would require removal to allow for the erection of the replacement dwelling in addition to those that were deemed appropriate for removal in relation to the previous planning

permission reference: PF/16/1417. Conditions in relation to tree protection would be required on any approval.

In accordance with paragraph 172 of the NPPF 'great weight' is afforded to conserving and enhancing landscape and scenic beauty of a national landscape designation such as the Norfolk Coast Area of Outstanding Natural Beauty. Given the minimal visual and landscape impact of a single storey dwelling in this location it is not considered that the proposal would have a significant detrimental impact upon the special qualities and setting of the AONB by day or night. Concerns have been raised over light pollution, however, the external lighting proposed is limited and the light spill of the single storey dwelling would incur less visual impact than the existing two storey dwelling.

In terms of Undeveloped Coast 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. In this case the proposal is for the replacement of an existing dwelling and therefore, the location cannot be altered.. In addition the principle of a replacement dwelling is acceptable in this location. Given that the proposal is for a single storey dwelling where the visual and landscape impact is considered to be minimal it is not considered that such a proposal would have a significant detrimental impact upon the open coastal character.

A grassed tennis court is shown on the proposed plans. Provision of a grassed tennis court is not considered to be development when considered against the definition in Section 55 of the Town and Country planning Act 1990. However, should any boundary treatments and/or flood lighting be proposed around the tennis court this can be addressed by way of a condition on any approval to ensure that the Local Planning Authority has future control over development.

Having assessed the proposed development, it is considered that the current proposal does not warrant the submission of a Landscape and Visual Impact Assessment and that the impacts from identified key viewpoints have been satisfactorily addressed within the submitted information by way of elevations and montages. Subject to the imposition of appropriate conditions in respect of landscape proposals, which should include the enhancement of the planting to the southern and eastern boundaries, it is considered that the proposed dwelling would not have an adverse impact on the landscape character of the area or the special qualities of the AONB. As such the development would comply with Policies EN1, EN2 and EN3 of the adopted Core Strategy.

6. Residential Amenity

The building is set within a substantial plot with high, mature trees to the north, west and south west of the plot and mature mixed boundary hedging, interspersed with trees to the south and east. The distance to the north and north western boundary is in excess of 30 metres and the distance to the nearest neighbour to the North West is in the region of 90 metres. When taking into account the distance to the nearest neighbour and existing mature landscaping/screening it is not considered that the proposed replacement dwelling would result in any loss of privacy to the neighbouring property, or any visual dominance or overbearing impact to it.

The proposal is considered to comply with the aims of Policy EN4 of the Core Strategy in relation to residential amenity.

7. Biodiversity

A Protected Species Survey was prepared by Wild Frontier Ecology dated September 2016, and submitted under planning permission PF/16/1417. As that report is still considered to be relevant to the current application it has been resubmitted as part of this application, and an addendum dated 4 July 2018 has also been submitted in addition to that survey.

The 2016 survey recorded evidence of light bat activity at the site, in relation to a single soprano pipistrelle roost. Recommendations for mitigation and compensation were made in the survey report to safeguard protected species during that development, which included the requirement for an EPS licence to legally carry out demolition of the existing structure.

The further survey work carried out in May and June this year (2018) provides up to date information in relation to protected species. It concludes that an additional common pipistrelle roost was located in the north east corner of the roof of the existing building. However, this does not alter the predicted impact potential (in accordance with Natural England guidance) of a 'minor negative' impact on the local bat population. A Low Impact Class Licence is recommended by the ecologist.

With regard to the impact on bats, whilst an offence under Article 12 of the European Habitats Directive (92/43/EEC) and Regulation 43 of The Conservation of Habitats and Species Regulations 2017 will occur, as two bat roosts will be lost when the existing dwelling is demolished. In accordance with the Standing Advice issued by Natural England, as part of the decision making process, the Local Planning Authority must consider whether an EPS Licence is likely to be granted by Natural England in order to derogate from the protection afforded by the Habitats Regulations. The three derogation tests (1. Overriding public interest, 2. No satisfactory alternative, and 3. Maintaining a favourable conservation status) have been assessed by the applicant's ecological consultant and it is considered that with appropriate mitigation and compensation the favourable conservation status of the local bat populations affected, would be maintained. Based on the evidence provided, the Local Planning Authority considers there is no reason why a Natural England EPS Licence would not be forthcoming subject to the provision of appropriate mitigation and compensation measures.

Other mitigation measures included avoidance of the bird nesting season when clearing the site or demolishing the building, unless a qualified ecologist determines no presence of nesting birds and good working practices during the construction period.

Therefore, subject to the imposition of appropriate conditions in relation to the recommended mitigation and EPS Licence it is considered that the development would have a minor negative impact on biodiversity and would comply with Policy EN9 of the Core Strategy.

8. Parking and Highway Safety

With regard to the access and car parking arrangements, Appendix C of the adopted North Norfolk Core Strategy contains the District Council's car parking standards. In accordance with those standards a 4 bedroom dwelling requires a minimum of 3 spaces and a maximum of 4 spaces. The submitted Site Plan has indicated parking for 2 cars. However, based on the proposed layout there is sufficient space for a further 2 spaces to be allocated or accommodated within the wider site. It is therefore considered that the proposal accords with the requirements of the Core Strategy. In addition the Highway Authority have raised no objection in regard to safe access, parking and turning arrangements. A condition has been requested that should the application be approved that a plan is submitted prior to the first occupation of the dwelling demonstrating that there is sufficient space to enable three cars to park, turn and re-enter the highway in forward gear.

The proposal therefore complies with the aims of Policies CT5 and CT6 of the adopted Core Strategy.

9. Other considerations

Given the applicant's intention to build the originally consented scheme if planning permission is not granted, the below sets out the conditions discharged from that scheme, and the relevant information submitted currently.

Condition 6 of the previously approved scheme was in relation to external lighting. An external lighting strategy plan has been submitted to show where any external lighting will be placed and advises that the lighting will be recessed down-lights with details supplied. A condition will be attached to ensure external lighting is installed in accordance with this plan and submitted details.

Condition 7 of the previously approved scheme required compliance with the mitigation measures as set out in the protected species report, including the timing of works outside bird nesting season and provision of at least 4no. new bat roosts. The first part of that condition will be re-applied. In respect of the second part of that conditions, (the 4no new bat boxes) a plan has been submitted to show where these will be placed, including details of the boxes themselves. A condition will be attached to ensure the boxes will be installed in accordance with this plan and submitted details.

Condition 11 of the previously approved scheme was in respect of the landscaping. A full landscape scheme has been submitted with this new application and will be conditioned to be complied with.

All other conditions were either positively worded or have not been discharged.

Conclusion and recommendation

The principle of the demolition of the existing dwelling and the erection of a replacement dwelling has already been accepted under the previous planning permission (PF/16/1417) and nothing has materially changed in terms of policy to change the acceptability of the principle of the development. The Judicial Review of this decision found in favour of the local planning authority finding that due legal process had been followed in determining the acceptability of the demolition of the existing dwelling and its replacement. Permission PF/16/1417 remains extant and therefore carries weight within the Councils consideration as a "Fallback" position.

Under the current application to be determined by Members the demolition of the existing dwelling is still sought along with an alternative design for a replacement single storey dwelling. The principle of which is acceptable. The existing dwelling is considered to make at best a limited contribution to the wider landscape setting and Conservation Area. Whilst it has some historical interest in terms of its association to nearby dwellings and Churches, and has a place in the portfolio of a locally important architect, this is not considered sufficient to warrant it being a statutorily Listed Building, or even a non-designated heritage asset as a locally listed building. The existing dwelling has been altered over time and its architectural interest is significantly diluted as a result.

Objectors concerns remain in relation to the demolition of the existing dwelling, the design and materials of the proposed dwelling, its visual impact on the appearance of the Area of Outstanding Natural Beauty, the character and appearance of the Glaven Valley Conservation Area, and the setting of adjacent listed buildings, and that it could set a precedent for other similar development.

Whilst these concerns are fully understood they must be balanced against the relevant case law, Development Plan policies and guidance contained in the National Planning Policy Framework together with responses from statutory consultees. Based on these considerations, it is considered that the proposal would not result in harm to the character and appearance of the Glaven Valley Conservation Area, or the setting of the Old Rectory or

St Nicholas Church. The proposed dwelling would not result in a significant increase in scale or height over the existing building, nor materially increase the impact on the landscape. The visual and landscape impacts would be negligible. Considerable care and thought has been taken to ensure that the treatment of the elevations provides an appealing design solution utilising both traditional and contemporary materials which will sit comfortably visually within the surrounding landscape set against the back drop of trees.

As a result, subject to appropriate conditions, it is considered that the dwelling would not detract from the special qualities of the AONB and would not harm the character and appearance of the Glaven Valley Conservation Area or the setting of other heritage assets. The proposal would therefore comply with the relevant policies of the adopted North Norfolk Core Strategy.

RECOMMENDATION: Approve, subject to the imposition of conditions relating to the following (summarised), and any others as deemed appropriate by the Head of Planning:

1. Time limit.
2. In accordance with submitted plans and details.
3. Submission of precise details of the materials to be used in the construction of the dwelling, in regard to the Corten steel, this should include details of how this material weathers in a coastal area.
4. Flint sample panel to be approved prior to first use on site.
5. Details of all new windows to include sections (scale not less than 1:20), colour, and finish.
6. Details of rainwater goods prior to first use on site.
7. Details of external lighting to dwelling including position and specification details to be submitted and approved prior to installation.
8. Details of all external lighting in relation to the tennis court, prior to installation.
9. Landscaping scheme in accordance with submitted plan 'Soft Landscape Proposals for new single storey dwelling' dated June 2018
10. Works carried out in accordance with tree protection measures in AIA.
11. Full details of tree protection measures in respect of the proposed ASHP
12. Details of ASHP, prior to installation, to include noise protection measures, service runs and dimensions.
13. Retention of trees as shown on submitted plan 'Soft Landscape Proposals for new single storey dwelling' dated June 2018
14. Retention of boundary hedge at 2m minimum (southern and eastern boundaries) as shown on submitted plan 'Soft Landscape Proposals for new single storey dwelling' dated June 2018
15. Compliance with recommendations of protected species survey (timing and no of bat boxes)
16. EPS Licence.
17. Provision of parking and turning area (3 cars)
18. Removal of permitted development rights for alterations and extensions
19. A plan showing existing and proposed land levels in ordnance datum prior to commencement
20. Bat boxes installed in accordance plan (drawing number: PL – 140) and details.

- (3) **DILHAM - PF/18/0606 - Change of use from B1 light industrial to Sui Generis (car repairs) & erection of compound fence (part retrospective); Granary Works, Honing Road, Dilham, North Walsham, NR28 9PR for Mr Purkiss**

- Target Date: 27 November 2018

Case Officer: Mr C Reuben

Full Planning Permission

CONSTRAINTS

LDF Tourism Asset Zone

Enforcement Enquiry

LDF - Countryside

C Road

RELEVANT PLANNING HISTORY for Granary Works, Honing Road, Dilham, NORTH WALSHAM, NR28 9PR

PLA/20051974 PF

POTATO STORE NEW BARN, HONING ROAD, DILHAM

CHANGE OF USE OF BUILDING FROM AGRICULTURAL TO B1 (LIGHT INDUSTRIAL)

Approved 13/02/2006

THE APPLICATION

The application proposes the change of use of an existing building from B1 (light industrial use to car repairs (Sui Generis use). The car repairs business started operating from the site in February 2018 and as such, the application is retrospective. The building consists of a part brick/part metal clad structure measuring approximately 22mx27m. It sits within a sizeable site with a gravelled parking/turning area to the north (front) of the building, storage space alongside the east elevation, a roadside hedge along the eastern boundary and landscaping to the north-west and alongside the western and southern elevations. The site is served by a single shared access point off Honing Road. Six residential properties lie immediately to the south of the building and are served by the same access.

REASONS FOR REFERRAL TO COMMITTEE

At the request of Cllr L Walker citing matters of compliance with Policy SS 2, adherence to existing conditions, neighbouring residential amenity and local interest.

PARISH COUNCIL

Dilham Parish Council - Objection. Concerns in regards to the hours of use and noise. A car repairs business is not appropriate for this site as it is within a residential area. The building's prior use was as a potato store, not a granary.

REPRESENTATIONS

Six objections have been received to the application, raising the following concerns:

- The change of use was implemented without planning permission.
- Existing conditions imposed on the building have not been adhered to, concerned that future considerations will similarly not be adhered to.
- The site has now taken the form of an industrial estate.
- Vehicles and equipment on the site represents an eyesore.

- The site entrance has poor visibility with conflict between garage vehicles and vehicles of local residents. The entrance has been blocked on numerous times by breakdown trucks, customer cars and delivery vehicles. The entrance tarmac has deteriorated and is not maintained.
- The business has moved from a more appropriate site in North Walsham, with two similar businesses already within easy reach of Dilham and as such, is surplus to requirements. Therefore, no justification for the business on the grounds of employment or providing necessary village services.
- Propose use is totally inappropriate and far removed from the original potato store.
- Residents faced with extra long business hours, six days a week, noise and pollution, and will severely impact upon quality of life.
- No right of access for business to use residential drive.
- Pollution may affect the natural wildlife environment.
- Health and safety concerns to due to stored waste and scrap cars.
- Increase risk to pedestrians as a result of increased vehicular use, and increased vehicular traffic through the village.
- Dilham has a peaceful reputation and attracts visitors due to river access, a traditional pub and scenery. Proposed development will have a detrimental impact on this.
- Residents have been miss-led as to the intentions regarding the use of the building since the purchase of the adjacent residential properties, as demonstrated by non-compliance with conditions and the continual 'creeping use' of the building.
- Concern in regards to required highway conditions and disagreement with Highway Officer's/Landscape Officer's conclusions.

CONSULTATIONS

Norfolk County Council (Highway - Broadland) - No objection. Commented that the proposed use would have sustainability benefit in reducing the need to travel to other car repair workshops, though also question the ability of the rural road network in regard to the possible resultant intensification in use. However, subject to conditions requiring widening of the existing access, improved visibility splays and provision of the on-site parking/turning areas, the proposed use is considered to be acceptable.

Environmental Health - In receipt of formal complaints from local residents in regards to noise and odour (under investigation). Although former B1 use may preclude an objection to Sui Generis (car repairs) use, the applicant has requested to increase the intensity in use of the site, which may lead to further complaints. If committee are mindful to grant permission, a number of conditions are strongly recommended, to include:

- personal consent to the current occupier only;
- insulation to be installed and maintained as per previously agreed details;
- no repairing of vehicles or storage of scrap vehicles externally, no use of plant/equipment/machinery or vehicles (except for access and egress) externally, and only allow the external storage of waste in appropriate receptacles;
- no cleaning/washing of vehicles externally;
- restricting opening hours to between 08:30 and 17:30 Monday-Friday, with no opening at weekends or on bank holidays
- further details of waste storage/disposal to be submitted;
- keeping windows/doors closed during hours of working (except to allow for access and for movement of equipment
- no paint spraying;
- details of any future required ventilation/extraction/air conditioning/refrigeration to be submitted and approved; and
- details of any future external lighting to be submitted.

Landscape Officer - No objection.

HUMAN RIGHTS IMPLICATIONS

It is considered that the proposed development may raise issues relevant to Article 8: The Right to respect for private and family life.

Article 1 of the First Protocol: The right to peaceful enjoyment of possessions.

Having considered the likely impact on an individual's Human Rights, and the general interest of the public, refusal of this application as recommended is considered to be justified, proportionate and in accordance with planning law.

CRIME AND DISORDER ACT 1998 - SECTION 17

The application raises no significant crime and disorder issues.

POLICIES

North Norfolk Core Strategy (Adopted September 2008):

SS 1: Spatial Strategy for North Norfolk

SS 2: Development in the Countryside

SS 5: Economy

EN 2: Protection and enhancement of landscape and settlement character

EN 4: Design

EN 13: Pollution and hazard prevention and minimisation

EC 2: The re-use of buildings in the Countryside

CT 5: The transport impact of new development

CT 6: Parking provision

National Planning Policy Framework (NPPF):

Section 2 – Achieving sustainable development

Section 6 – Building a strong, competitive economy

Section 12 - Achieving well-designed places

Section 15 - Conserving and enhancing the natural environment

MAIN ISSUES FOR CONSIDERATION

Principle

Design

Residential amenity

Highway impact

Landscape impact

Environmental impact

APPRAISAL

Principle (Policies SS 2, EC 2 and NPPF Para's 83(a) and 84):

The site in question lies within the designated Countryside policy area of North Norfolk, as defined under Policy SS 2 of the adopted North Norfolk Core Strategy. Within this area, specific types of development are acceptable but are limited to those which specifically require a rural location and are listed in the policy. One such accepted use is the re-use of an existing building for economic use, subject to compliance with the criteria set out in associated Policy EC 2. However, the use must still require a rural location.

The existing building was granted consent in 2005 under application ref: PF/05/1974 for its change of use from agricultural use (a potato store) to B1 use (a steel fabrication business). Acceptance of that application was based upon adopted Local Plan policy at the time (pre-dating the now adopted North Norfolk Core Strategy) with a strict set of conditions imposed in relation to, in particular, noise mitigation, taking account of the close proximity of the building to neighbouring properties to the south.

Key to determination of this current application is whether the proposed car repair business (Sui Generis) is acceptable in principle in the Countryside, in particular, whether it truly requires a rural location as required by Policy SS 2. Although associated Policy EC 2 of the Core Strategy does allow the re-use of rural buildings for economic uses, these uses must be 'appropriate in scale and nature to the location' and '...in accordance with other policies to protect...amenity'. The policy approach set out in policy EC 2 is in broad conformity with paragraph 83(a) of the National Planning Policy Framework which supports the 'sustainable' re-use of rural buildings for economic uses. However, this is caveated by paragraph 84 of the NPPF which states that whilst sites in rural areas may have to be found for local business needs, such development should be '...sensitive to its surroundings...'.

It is clear that the car repairs business is significant, and certainly a larger operation than the permitted B1 (light industrial) use, noting the size of the existing building and the number of cars parked within the site. This being the case, it is considered that the proposed business represents a much larger business/operation than would normally be expected in the context of an edge of village location (noting that the village itself is small). Such uses are better suited to designated employment land/industrial areas as facilitated by Policy SS 5 of the Core Strategy, and indeed this is where the use previously took place, being operational from 31 New Road, North Walsham, in close proximity to North Walsham Town Centre. As such, it is considered that the size of the business, coupled with the character of the location, is considered to be disproportionate in terms of its scale and nature to the locality, with no convincing justification provided as to why this particular location is required, nor that there is a local need for such a business.

It is recognised that historically small, localised garages have been, and indeed remain, a feature of some small villages. Although not a material policy consideration in the determination of this application, Core Strategy Policy CT 1 (which ensures the retention of important local facilities and services) provides useful guidance as to the type of services/facilities that are considered to be important to a local community, particularly in order to safeguard their future. Notably, a car repairs business is not listed as one of these key services/facilities. It is further noted that similar businesses already exist in the locality, one located approximately half a mile to the north along Honing Road, and another located just over a mile away on Yarmouth Road in Smallburgh. Indeed, the business located in Smallburgh is smaller and more appropriate in scale to a rural location. As such, this further casts doubt as to the need for an additional car repairs business in the locality, which owing to its size, is likely to draw business from a much wider area.

Consideration has been given to the economic benefits of the proposed use, current employment levels at the facility and the existing lawful B1 use of the building. However, it is not considered that any potential economic benefits of the business, nor the permitted prior use of the building, would outweigh the policy conflicts identified.

On balance, it is considered that the proposed use does not comply with Core Strategy Policy SS2 as the proposed use does not require a rural location. In addition, the proposal fails to comply with Policy EC 2 due to the size of the business not being appropriate in scale and nature to the location. Furthermore, the proposed use does not conform to the aims of NPPF Paragraphs 84.

Design (Policy EN 4):

Regarding design, no alterations are proposed to the existing building. The application proposes an additional 1.82m high fence along part of the eastern site boundary, alongside an existing hedge, which would help to screen existing storage areas alongside the eastern side of the building. The proposed fencing does not raise any major design concerns. At present, due to the level of outdoor storage and parking, the site has adopted a more industrial look, however, taking note of the consultation responses received and associated conditions required seeking the limitation of external working and storage, much of the visual impact of the proposed use could be addressed.

On balance, it is considered that in regards to design, the proposals are acceptable against the aims of Policy EN 4 of the Core Strategy.

Residential amenity (Policy EN 4):

The nearest residential properties lies directly to the south of the building. A number of objections have been raised in regards to the proposed use, in particular relating to noise and visual impact created by the proposed use. The site has an existing lawful B1 use (previously occupied by a steel fabrication business) and as part of acceptance of that use a number of strict conditions were suggested by the Environmental Protection Officer and imposed in order to control noise from the site, specifically in regards to the installation of acoustic insulation, hours of use, keeping doors closed, amongst other measures.

The proposed use, being for car repairs, raises similar issues, particularly in regards to whether it will result in any additional noise impact upon nearby residents. No formal objection has been raised by the Environmental Protection Officer, though neither are they particularly supportive of the proposed use and at the very least, it is expected that significantly restrictive conditions are again imposed to ensure that the previously installed insulation remains installed and maintained appropriately, and with controls over hours of use, keeping doors closed and preventing external working.

The key consideration regarding compliance with Policy EN 13 is whether, even with such conditions imposed, the proposed use is acceptable given the proximity to nearby residents. In particular, the operation of the site is considered to be, to an extent, materially different to the previous building use, due to the greater level of vehicular movement into/out of the site which itself creates noise, and the likelihood that the garage shutter doors will be frequently opened/close to allow vehicles/equipment in/out of the building - this again is partially alleviated by the positioning of the current access/doors on the northern side of the site. The suggested conditions will certainly help to minimise the level of noise/disruption and may be sufficient to comply with Policy EN 4, though a level of concern remains, particularly as to the appropriateness of such a facility being located directly adjacent to residential properties. If the use is approved, it is perhaps prudent to ensure an ongoing programme of monitoring to ensure that the conditions are strictly adhered to.

In regards to visual amenity, concern has been raised in regards to the visual impact of parked cars and storage of waste externally which is stated by residents to have resulted in an overly industrial appearance of the site and with a resultant visually unappealing outlook. As stated earlier in regards to design, this matter can be satisfactorily controlled through the imposition of conditions to maintain an acceptable visual appearance.

Environmental considerations (Policy EN 13):

As referred to above, the original acceptance of the use of the building for B1 purposes was made under previously adopted policy, and on the basis of strict conditions proposed by the Environmental Protection Officer, given the nature of the proposed business at the time. The matter of noise has been addressed above in relation to amenity and raises similar concerns in regards to compliance with Policy EN 13. The suggested conditions will help to control operations within the site to alleviate any noise impact as much as practically possible.

In terms of the potential for pollution and impact on drainage, much of the external area of the site consists of gravel/soft landscaping and as such, consideration has been made of the potential for chemical/oil leakage given the proposed use and the current storage of vehicles/waste externally. However, subject to conditions to prevent the storage of vehicles externally, (except for staff/customer parking) and the suitable provision of waste receptacles (further details of which would be required) it is considered that this matter could be satisfactorily addressed to comply with Policy EN 13.

Landscape impact (Policy EN 2):

The position of the site on the edge of the village and adjacent open countryside requires consideration of any potential landscape impact. The site is at present relatively enclosed within a hedged site boundary. Given that no changes are proposed to the external appearance of the existing building, and subject to limitations on external working/storage, it is not considered that the proposed use will have a significantly detrimental impact upon the appearance of the surrounding landscape and as such, the proposed use would be broadly compliant with Policy EN 2.

Highways impact (Policies CT 5 and CT 6):

At present, the site is served by a single point of access onto Honing Road. This access is also shared by residents on the adjoining housing development to the south, with the access drive leading around the northern and western boundary of the application site. Much concern has been raised by local residents in regards to the safety of this point of access, highlighting continual conflict between motorists entering and exiting the garage and those using the residential drive. In addition, it is stated that delivery vehicles frequently miss the turn into the garage and have to turn around using the residential drive, with further concerns raised as to the general increase in traffic that may occur through the village as a result of the proposed use.

The Highway Authority have not raised an objection to the proposed change of use, subject to access improvement works, to include the widening of the existing access point and improved visibility splays. Following the public objections received, these concerns have been raised with the Highway Officer, in addition to which an alternative arrangement has been suggested to create a new access into the garage site from Honing Road and close off the existing access to the garage, leaving the existing access solely for the use of the residents. Both this, and the objections have been considered by the Highway Officer who has maintained that the existing access remains suitable for the proposed use subject to improvements, and as such, there remains no objection, whilst further stating that a new access would be unnecessary and thus not supported.

The Highway Authority response does, however, question the suitability of the surrounding highway network to cater for any material intensification in use of the site, though this matter has to be weighed against the access improvements that could be secured. The response further highlights the benefit of a local vehicle repairs business which may reduce the need for rural communities to travel to such facilities. This comment, however, is afforded little

weight given that there is no guarantee that local people will use the facility, and further noting the presence of an existing car repair businesses in the locality.

As such, although there are concerns from an officer perspective in regards to the current access arrangements, with no objection from the Highway Officer, it is not considered that refusal based upon the current arrangements can be substantiated under Policy CT 5. Plenty of space exists within the site for both staff and customer parking and as such, the proposed use complies with Policy CT 6.

Conclusion:

It is considered that the proposed use would not accord with the aims of Core Strategy Policy SS2 which seeks to limit development to that which requires a rural location, nor with Paragraph 84 of the NPPF. In this respect, the applicant has not sufficiently demonstrated why a rural location is necessary for the business, nor that there is a community need for the business. Furthermore, it is not considered that the size of business proposed is appropriate in the context of the rural locality, in what is considered to be an unsustainable location, contrary to Policy EC 2. No convincing mitigating circumstances have been put forward to outweigh the policy conflict identified. In addition to this, the Development Committee will need to consider whether the potential noise impact of the proposed use upon the amenity of nearby residential properties can be sufficiently mitigated through appropriate conditions, in order to comply with Policies EN 4 and EN 13.

RECOMMENDATION: REFUSAL for the reasons specified below:

The District Council adopted the North Norfolk Core Strategy on 24 September 2008, and subsequently adopted Policy HO 9 on 23 February 2011, for all planning purposes. The following policy statements are considered relevant to the proposed development:

- SS 1 - Spatial Strategy for North Norfolk
- SS 2 - Development in the Countryside
- EC 2 - The re-use of buildings in the Countryside

The National Planning Policy Framework (NPPF) (published 27 March 2012) is also material to the determination of the application. The following sections are considered relevant:

Section 6 – Building a strong, competitive economy (paragraph 84)

In the opinion of the Local Planning Authority the proposal constitutes an unacceptable form of development in the Countryside policy area where development is limited to that which requires a rural location. It is considered that the applicant has failed to demonstrate satisfactorily that there are material considerations to justify a departure from Development Plan policy in this case.

Furthermore, it is not considered that the proposed use is appropriate in scale and nature to the rural location, nor represents the sustainable growth or expansion of a business in a rural area, with no evidence provided of a specific need for such a business in the locality, contrary to Policy EC 2 and Paragraphs 83(a) and 84 of the National Planning Policy Framework.

In the event that Members are minded to refuse the application authority is sought for enforcement action to remove the unauthorised uses from the site within 12 months under Section 172 of the Town and Country Planning Act 1990 as amended by the Planning and Compensation Act 1991.

- (4) **OVERSTRAND - PF/18/1531 - Demolition of existing conservatory and erection of two storey side and rear extensions, single storey rear extension and front porch; 6 Thurst Road, Overstrand, Cromer, NR27 0PR for Mr Marshall**

Target Date: 29 November 2018

Case Officer: Bruno Fraga da Costa

Householder application

CONSTRAINTS

LDF - Settlement Boundary

LDF - Residential Area

LDF - Coastal Erosion Constraint Area

Conservation Area

RELEVANT PLANNING HISTORY

IS1/18/1191 IPA

6 Thurst Road, Overstrand, Cromer, NR27 0PR

Meeting only, regarding refused application Ref: PF/18/0825

Advice Given (for pre-apps) 04/07/2018

PF/18/0825 HOU

6 Thurst Road, Overstrand, Cromer, NR27 0PR

Demolition of existing conservatory, erection of part single and part two storey wrap around extension to side and rear, proposed front porch, 2 no. conservation roof lights on front elevation and installation of solar panels to side/rear roofslopes

Refused 19/06/2018

PF/16/0844 PF

6 Thurst Road, Overstrand, Cromer, NR27 0PR

Erection of single-storey rear and side extension, dormer extensions to front and rear, and conversion of outbuilding to residential annex

Approved 19/09/2016

THE APPLICATION

The property lies north of Overstrand, and east of Cliff Road. The existing two-storey dwelling is originally from the 19th century. The dwelling sits 6 metres away from Thurst Road and some 3 metres and 9 metres to the properties located west and east.

The proposed development involves the following: demolition of the existing conservatory extension to the rear. Construction of single-storey and two-storey extensions to the left and rear. The construction of a single-storey porch extension to the front elevation. The installation of Velux Conservation roof windows to the front roof slope and Solar PV panels to the rear roof slopes.

The proposed side and rear extensions would extend 4.5 metres to east and 4 metres south accommodating a two-storey extension and 6.50 metres south at single-storey. In the ground floor, the proposed extensions accommodate a garage/bike store, utility room and WC, kitchen and dining/family room. In the first floor, it would accommodate two bedrooms, two bathrooms (one ensuite) and a dressing room.

The proposed materials include painted brickwork walls, clay tiles/flat roof, PVC-u windows and doors, timber fence/hedge boundaries and gravel for the vehicle access.

REASONS FOR REFERRAL TO COMMITTEE

At the request of Councillor Angie Fitch-Tillett, on the grounds of overdevelopment, detrimental to the conservation area and public interest.

PARISH/TOWN COUNCIL

Overstrand Parish Council – objects to the planning application, on the grounds it will alter the streetscape, it is in a conservation area, it is an overlarge development that will have an overbearing appearance, it will lose distinction of character and it affects the light on neighbouring properties.

REPRESENTATIONS

Eight letters of objections received from the occupiers of neighbouring properties, which raised the following concerns:

- Need to preserve and protect the character of the property which is 120 years old
- Blocking of light to next door neighbours properties
- Large re-development rather than extension of property which is in a designated Conservation Area
- Parking in Thurst Road would increase
- Erosion of the conservation area
- Loss of light to a neighbouring property
- Changes in the character of the house and surrounding Conservation Area, and blocking the light into the neighbours top floor living room
- The proposed changes to this house will neither preserve nor protect the character of the property or this area of Overstrand
- To have a garage as an integral part of a building of this age shows total disregard of the character of the house and disrespect for the Conservation Area
- The rear extension would reduce the amount of light into the neighbouring bungalow to the west
- Out of character with the surroundings and it would also be in conflict with the size and scale of each of the nearest properties
- The building is in a designated Conservation Area and the planned extensions to the house will radically change the character of it
- The size of the proposed extensions to the rear and side of the building which would block out light from neighbouring properties
- The almost doubling of the property would seem to be more of a re-development than a mere extension
- This old early Edwardian house is in a designated Conservation Area and as such, any development would change the character of the house and surrounding area
- The proposed new development is, to all intense and purpose, a new build by stealth. It is far too big for the plot and I consider it to be over development
- It will overshadow the properties to both sides and has the potential to dominate the road rather than complement the existing dwellings
- Potential of overlooking through the two Velux roof lights
- The addition of a porch will ruin the character and appearance of the front of the cottage
- The large plans to extend this property, particularly at the back are out of character and proportion with the original old house
- The new extension would not be subordinate in appearance to the original house and out of character in a Conservation Area
- The proposed extension would be overbearing for immediate neighbours and could lead to loss of light and privacy

CONSULTATIONS

Landscape Officer – The application was supported by a Bat and Nesting Bird Survey that did not identify the presence of protected species within the buildings. The development is unlikely to result in an offence to protected species and is therefore compliant with Policy EN 9.

Conservation and Design Officer – the quantum of additional built form still results in overdevelopment of what is a characterful cottage within the Conservation Area. Some poor detailing and incongruous additions compound this overdevelopment. To this end, the proposal fails to preserve or enhance the character and appearance of the Conservation Area and results in less than substantial harm to the heritage asset in question. In the absence of any wider public benefits to outweigh this harm, Conservation and Design recommendation must be one of refusal.

HUMAN RIGHTS IMPLICATIONS

It is considered that the proposed development may raise issues relevant to Article 8: The Right to respect for private and family life.

Article 1 of the First Protocol: The right to peaceful enjoyment of possessions.

Having considered the likely impact on an individual's Human Rights, and the general interest of the public, refusal of this application as recommended is considered to be justified, proportionate and in accordance with planning law.

CRIME AND DISORDER ACT 1998 - SECTION 17

The application raises no significant crime and disorder issues.

POLICIES

North Norfolk Core Strategy (Adopted September 2008):

SS 1 – Spatial Strategy for North Norfolk

EN 4 – Design

EN 8 – Protecting and Enhancing the Historic Environment

EN 11 – Coastal Erosion

National Planning Policy Framework

Section 12 – Achieving well-designed places

Section 14 – Meeting the challenge of climate change, flooding and coastal change

Section 16 – Conserving and enhancing the historic environment

MAIN ISSUES FOR CONSIDERATION

1. Principle
2. Design and the Conservation Area
3. Amenity

APPRAISAL

1. Principle – SS 1, EN 11

The site is located in the coastal service village of Overstrand, which according to Policy SS 1 of the North Norfolk Core Strategy is where a small amount of new development will be focused to support rural sustainability.

The proposed development seeks the demolition of the existing conservatory to the rear of the property, and the erection of single and two-storey extensions, to the side and rear. Against Policy SS 1 the proposed development is considered to be acceptable in principle.

However, under Policy EN 11, the intensification of existing development will not be permitted unless it can be demonstrated that there is no additional risk to life or risk to property. The proposed development is not in itself likely to increase coastal erosion, however, the dwelling will increase from a 3 bedroom property to a 4 bedroom property with an additional study which could be used as a bedroom. The property falls within the 50 year epoch for erosion and there is considered to be potential for an increase in risk to life over the lifetime of the development. The development is therefore considered to be unacceptable against the requirements of Policy EN 11.

2. Design and the Conservation Area – EN 4, EN 8

Policy EN 4 states that the design of new development will be of a high quality and reinforce local distinctiveness. Design which fails to have regard to the local context and does not preserve or enhance the character of the area will not be acceptable. In addition, under Sections 66 (1) and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (LBCA Act 1990) special regard to the desirability of preserving and enhancing the Conservation Area should be had by decision makers.

Paragraph 127 of the National Planning Policy Framework (NPPF) states that Planning policies and decisions should aim to ensure that developments will function well and add to the overall quality of the area (...); are visually attractive as a result of good architecture (...); are sympathetic to local character and history (...) and establish or maintain a strong sense of place (...).

The proposed two-storey side extension would extend 4.5 metres to east to accommodate a garage/bike store, bedroom and bathroom. The two-storey rear extensions would extend 4 metres south to accommodate a bedroom with en-suite. The scheme also involves single-storey extensions that extend 6.50 metres south. They will accommodate a utility room, W.C, kitchen and dining/family room.

The scheme is considered overdevelopment. The proposed footprint, in combination with the two storey elements of the scheme, would double the size and scale of the original dwelling. In particular, the proposed two-storey rear extensions would not relate well to the host building, introducing awkward flat roofs, and a mix of projection depths of the proposed extensions meaning that the extensions would not be subservient in appearance but would dominate and detract from the host property. The resulting scale and massing of the dwelling would result in a building that would have a bulky visual appearance, which is considered to be detrimental to the character and appearance of the host building, and out of character with the surrounding area. Further, the proposed garage door of the proposed two-storey side elevation is out of character with the host dwelling elevation and detrimental to the overall appearance of the surrounding area.

Overall, the proposed materials would match those of the existing property. These include painted brickwork walls, clay tiles/flat roof, PVC-u windows and doors, timber fence/hedge boundaries and gravel for the vehicle access. However, the use of facing brickwork on the front elevation is not appropriate and in keeping with the character of the original dwelling.

The proposed extensions are considered to be detrimental to the architectural character of the existing dwelling, and to have a detrimental visual impact in the wider street scene and Conservation Area. Therefore, the proposals are considered to be contrary to the aims of Policies EN 4 and EN 8 of North Norfolk Core Strategy (2008), the NPPF, and Sections 66 (1) and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

3. Amenity – EN 4

Given the scale of the development, and the close proximity of the two-storey rear extension to the west boundary, it would result in the loss of light to the adjoining single storey bungalow. In addition, the gable size of the west elevation would have an overbearing impact on the occupiers of the neighbouring property, to the significant detriment of their residential amenity.

Moreover, the proposed rear extension does not meet the recommended distances required by the North Norfolk Design Guide. It sits 6 metres away from neighbouring property situated west and 7 metres from its dormer window. Under the North Norfolk Design Guide, the distances should meet the minimum of 8.5 metres in case of a blank gable in relation to secondary level degree windows. Therefore, the proposed development is not compliant with Policy EN 4 and paragraph 3.3.10 of North Norfolk Design Guide.

RECOMMENDATION:

REFUSE

The District Council adopted the North Norfolk Core Strategy on 24 September 2008, and subsequently adopted Policy HO 9 on 23 February 2011, for all planning purposes. The following policy statements are relevant to the proposed development:

Policy EN 4 – Design

Policy EN 8 – Protecting and Enhancing the Historic Environment

Policy EN 11 – Coastal Erosion

The National Planning Policy Framework (NPPF) is also material to the determination of the application and the following sections are relevant:

Section 12 – Achieving well-designed places

Section 16 – Conserving and enhancing the historic environment

In the opinion of the Local Planning Authority, the proposed two-storey rear extensions would, as a result of their scale, massing and form, result in additions to the existing dwelling which would be unduly bulky, and not subordinate in appearance. As a result, the extensions would be out of character with the host dwelling and the wider street scene and Conservation Area contrary to policies EN 4 and EN 8 of the adopted North Norfolk Core Strategy

In addition, due to the scale, massing, and close proximity of the proposed development to the western properties, it would result in a loss of light and overbearing impact on the adjoining property to the overall detriment of the residential amenities of the occupiers contrary to policy EN 4 of the adopted North Norfolk Core Strategy.

Furthermore, the proposed development will see the dwelling increase from a 3 bedroom property to a 4 bedroom property with an additional study which could be used as a bedroom. The property falls within the 50 year epoch for erosion and there is considered to be potential for an increase in risk to life over the lifetime of the development. The development is therefore considered to be unacceptable against the requirements of Policy EN 11.

The development is not in accordance with the requirements of the Development Plan, and there are no material considerations, which would outweigh the policy conflict.

- (5) **SMALLBURGH - PF/18/0464 - Erection of 2 two-storey dwellings, detached garage & new accesses; Smallburgh Hall, Hall Drive, Smallburgh, Norwich, NR12 9FW for Mr Coaley**

Minor Development

- Target Date: 07 May 2018

Case Officer: Mr G Linder

Full Planning Permission

CONSTRAINTS

Countryside

Tree Preservation Order

Listed Building Grade II - Consultation Area

RELEVANT PLANNING HISTORY

DE21/16/0887 ENQ

Smallburgh Hall, Hall Drive, Smallburgh, Norwich, NR12 9FW

Erection of two 2 storey dwellings and new access

Response - 29/11/2016

PF/17/0768 PF

Smallburgh Hall, Hall Drive, Smallburgh, Norwich, NR12 9NW

Erection of 2 two-storey dwellings, cart shed & new access

Withdrawn by Applicant 06/07/2017

THE APPLICATION

Seeks planning permission for the erection of two detached barn style dwellings on land to the south of Hall Drive adjacent to Smallburgh Hall, a Grade II listed building. It is intended that the scheme will be a form of enabling development which will provide funding to enable and facilitate essential maintenance and renovation of the Hall.

The dwelling to Plot 1 will have 5 bedrooms with an attached garage and study and a total floor area of 329.75 sq. metres. Plot 2 will involve the erection of a 3 bedroom dwelling with detached double cart shed garage and will have a total floor area of 245.12 Sq. metres.

Each dwelling would be set on a red brick plinth with the external walls of horizontal timber boarding under red clay pantile roofs.

Access to the site will be via Hall Drive a single track roadway which serves Smallburgh Hall, and a complex of converted outbuildings related to Old Hall Farm: farm cottages and Edgefield House (these are outside of the applicant's ownership). Hall Drive joins Hall Road 340 metres to the east.

REASONS FOR REFERRAL TO COMMITTEE

At the request of the local Ward Member Councillor Simon Shaw having regard that the proposed development can be seen as enabling development in order to secure works to the Grade II listed Smallburgh Hall.

PARISH/TOWN COUNCIL

Smallburgh Parish Council - Makes the following comments:-

- Agrees with the comments of the Highways Authority regarding the access.
- There is insufficient information regarding the cost of the repairs to the Hall.

- If permission is granted a time limited repair schedule should be included as a condition.

REPRESENTATIONS

No comments received.

CONSULTATIONS

County Council (Highway) – Broadland – *No objection, however, in terms of transport sustainability the site is remote from any level of service facility or access to public transport, as such, occupiers of the proposed dwellings are realistically therefore reliant on the use of the car for everyday travel. Contrary to sustainability objectives.*

Conservation and Design Officer – Objects

The site is situated alongside the existing access road to the north and east of the two listed buildings. From a study of historic maps, this straight driveway has always been the principal approach to the Old Hall and subsequently also to the ‘new’ Hall. As such, it not only carries significance in its own right but it also influences and informs the setting of the protected properties. The approach therefore has an intentional formality which seemingly was never meant to be interrupted by buildings. Instead the ancillary structures have for the most part been confined to the western (service) side of the Halls. Against this context, any new build to the east (particularly in the large two-storey form shown) would not only impose itself ‘front-of-house’, but it would also run contrary to the established hierarchy of the group (in which the existing barns and outbuildings generally occupy subservient positions). On this basis, there can be no degree of enthusiasm for the proposed development which would certainly not enhance the setting of the heritage assets.

In terms of whether it would actually harm, we clearly have to be mindful that there would only be limited indivisibility between the ‘principal’ listed buildings and the two plots. Hence, depending upon the associated landscaping, it is likely that only filtered views would be mutually available (principally during the winter months). Also relevant are the more recent buildings which have sprung up on the northern side of the drive (i.e. the modern stable block and the Hall Drive semis), and which already to some extent challenge the sense of arrival at the main hall. Despite these mitigatory points, however, it is still considered that the two dwellings proposed, by virtue of their much larger scale and more immediate position, would inevitably impose themselves to a greater degree than the existing structures. As a result, we must conclude that there would be a level of harm resulting from the proposed development, albeit at the lower end of the ‘less than substantial’ spectrum (para 134 of the NPPF refers). Nonetheless, harm is harm and requires us to consider any public benefits accruing from the proposals.

This latest submission has put forward a case for the scheme being enabling development; i.e. that the proceeds of the scheme would be directed towards the repair of the listed hall. However, one of the central tenets of enabling development is that it is very much a last resort mechanism having explored all other possibilities. In this case, no evidence has been provided to suggest that any alternatives have been explored. We therefore have no way of knowing whether there any other sources of investment available or whether a change of ownership (and an injection of funds) would simply address the inherent conservation needs of the building.

On the subject of which, the property undoubtedly has a significant want of repair as identified by the submitted schedule of repairs. However, the majority of this work would seem to fall under the heading of building maintenance and is thus not dissimilar to many other historic properties. Whilst cumulatively the cost of this work is now considerable, this

would appear to be the result of years of under investment rather than any exceptional needs of the heritage asset. Therefore, as much as Conservation & Design might want to see the listed building brought back into a good state of repair, a case cannot cogently be made for setting aside the normal planning policies in this case. Also material in this conclusion is the fact that the enabling 'subsidy' would only secure the immediate repair of the building rather than provide a longer term mechanism for sustaining its future.

Away from the question of principle, only limited time has been spent assessing the submitted designs given the overarching concerns. However, there is a clear contradiction in putting forward 'barn' forms in a location which historically would never have supported such agrarian structures. This aside, the elevations themselves have nothing which inherently jars on the eye. On the whole, they display acceptable proportions and would (on another site at least) offer a reasonable level of visual interest. This notwithstanding, they are obviously substantial properties which would surely have liveability issues within the remaining tree cover (something separately addressed by our Tree Officer).

In summary, the submitted scheme is one that ticks very few boxes in planning terms. With it also resulting in some heritage harm being caused to the setting of the existing listed buildings, this application is not one that can be actively supported by C&D. At the same time, it is acknowledged that the level of identified harm would be relatively limited. This notwithstanding, under s66 of the Planning (Listed Buildings & Conservation Areas) Act, 1990, the LPA must still have special regard to this harm and consider it alongside; i) the other material planning considerations (the policy disbenefits, the Landscape objection and the highway reservations), and, ii) any public benefits accruing from the scheme. As we stand, that balance appears to be tilted in favour of a refusal.

Landscape Officer – Objects

Points to the fact that the site is designated as a Deciduous Woodland Priority Habitat on the government's geographical information mapping system and that full tree cover is clearly shown on the first edition Ordnance Survey Maps of the area and 2012 Aerial photographs. However as a result of a previous site visit to assess a pre-application is clear that trees had been felled within site and the roots removed. Furthermore it is not apparent if a formal felling licence was issued by the Forestry Commission but if one had been they would require some form of replanting for the area.

Given the felling that had taken place the Council considered that the area should be protected and maintained as a woodland and as a result severed a Woodland Tree Preservation Order (TPO). The Woodland TPO will ensure that the site is maintained as a woodland as the Order protects seedlings and saplings that will regenerate naturally on the site. The Order will prevent mowing or site clearance as it would be an offence to damage or remove the seedlings or saplings.

HUMAN RIGHTS IMPLICATIONS

It is considered that the proposed development may raise issues relevant to Article 8: The Right to respect for private and family life.

Article 1 of the First Protocol: The right to peaceful enjoyment of possessions.

Having considered the likely impact on an individual's Human Rights, and the general interest of the public, refusal of this application as recommended is considered to be justified, proportionate and in accordance with planning law.

CRIME AND DISORDER ACT 1998 - SECTION 17

The application raises no significant crime and disorder issues.

POLICIES

North Norfolk Core Strategy (Adopted September 2008):

Policy SS 1: Spatial Strategy for North Norfolk
Policy SS2: Development in the Countryside
Policy EN 2: Protection and enhancement of landscape and settlement character
Policy EN 4: Design
Policy EN 8: Protecting and enhancing the historic environment
Policy CT 5: The transport impact on new development
Policy CT 6: Parking provision

National Planning Policy (NPPF): (2018):

Section 1 – Introduction
Section 2 – Achieving sustainable development
Section 4 – Decision-making
Section 5 – Delivering a sufficient supply of homes
Section 9 – Promoting sustainable transport
Section 12 – Achieving well-designed places
Section 16 - Conserving and enhancing the historic environment

MAIN ISSUES FOR CONSIDERATION

1. Principle of development
2. Heritage and enabling works
3. Layout and design
4. Amenity
5. Highways and parking
6. Trees and landscaping

APPRAISAL

1. Principle of development

Policy SS 1 sets out the spatial strategy for North Norfolk and identifies main and service settlements where development of varying scales can take place. The remainder of the district, including settlements not listed in the policy, is designated as Countryside. This is the lowest tier of the settlement hierarchy and within the designated countryside area development is restricted to particular types of development to support the rural economy, meet affordable housing needs and provide renewable energy. The types of development acceptable in principle in designated Countryside are listed under policy SS 2. New build, unrestricted open market dwellings are precluded.

The National Planning Policy Framework encourages sustainable patterns of development, specifically with regard to new housing. It states that new isolated dwellings in the countryside should be avoided and encourages new housing to be directed towards those areas that have better access to everyday basic services for future occupiers to avoid reliance of the use of the car. The Core strategy reflects this approach and its policies relating to the supply of housing have been found to be consistent with the NPPF at a very recent appeal.

The proposal is not considered to be sustainable development and is therefore contrary to policies SS 1 and SS 2 of the adopted North Norfolk Core Strategy.

However paragraph 79 of the National Planning Policy Framework is also relevant. This states that planning decisions should avoid the development of isolated homes in the countryside unless certain specified circumstances apply. One of these such circumstances

is where 'the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of the heritage asset'. This is considered in detail in section 2 of this report below.

2. Heritage and enabling works

The Development Committee is required by Sections 66 (1) and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (LBCA Act 1990) to have special regard to the desirability of preserving a Listed Building and its setting, or any features of special architectural or historic interest which it possesses. The desirability of preserving listed buildings, and their setting is not a mere material consideration to which appropriate planning weight can be attached, it is a legal obligation to have 'special regard' or pay 'special attention' to these matters. When a local authority finds that a proposed development would harm these matters, it must give that harm considerable importance and weight as a matter of law. There is effectively a statutory presumption against planning permission being granted where such harm arises. That presumption can, however, be outweighed by material considerations, including the public benefits of a proposal.

Development Committee should also take into account the advice contained within the National Planning Policy Framework (NPPF), which specifically addresses the need for conserving and enhancing the historic environment, in particular paragraph 193, which states:

'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be)...'

Paragraph 196 goes on to state: *'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'*.

Considerable weight must therefore be given to the preservation of heritage assets including their setting.

In considering development proposals affecting heritage assets, Core Strategy Policy EN 8 sets out that *'Development that would have an adverse impact on...special historic or architectural interest will not be permitted'*. However, this element of Core Strategy Policy EN 8 is now out of step with the guidance set out in the NPPF which is more permissive towards allowing development affecting heritage assets but only where there are clear and convincing public benefits in favour, and in accordance with the statutory requirements set out above.

In terms of the heritage assets likely to be affected, it is important to assess whether, how and to what degree setting makes a contribution to their significance.

The NPPF defines setting of a heritage asset as the surroundings in which it is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, and may affect the ability to appreciate the significance or may be neutral. Significance is defined as the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical presence, but also from its setting.

Hall Drive, which runs in an east west direction, is shown on historic maps as being the principle approach to Old Hall Farm, a Grade II listed building dating from the early C16. Old

Hall Farm is situated at the extreme western end of the driveway which also serves “New” Hall to the south, a Grade II listed building built in 1820. Between Old Hall Farm and Smallburgh Hall are a range of former barns and cottages which are now in residential use whilst to the rear are further converted barns and to the north of the drive a further two cottages all of which inform the setting of the protected properties. It is therefore considered that the approach along Hall Drive has an intentional formality and that Old Hall Farm and Smallburgh Hall form the principle buildings within the group, with other buildings playing a supporting role. The introduction of two new dwellings would adversely alter this historical context and detract from the approach to the hall, which seemingly was never meant to be interrupted by buildings.

In terms of whether the proposed development would result in actual harm to the listed buildings and their setting it is accepted that there will be limited indivisibility between the ‘principal’ listed buildings and the two plots and that depending upon the associated landscaping, it is likely that only filtered views would be mutually available. Notwithstanding this it is considered that the two dwellings would also run contrary to the established hierarchy of the group and by virtue of their much larger scale and position adjacent to the driveway would inevitably impose themselves to a greater degree than the existing buildings. As a result it is concluded that the proposed development would not enhance the setting of the heritage assets and that there would be a level of harm, albeit at the lower end of the ‘less than substantial’. Furthermore, as required by paragraph 196 of the NPPF officers are of the opinion that the additional public benefits arising from the development, aside from securing the listed building’s future, are not clear. The listed building appears to require nothing more than general maintenance works. It is not dilapidated, it appears to be structurally sound and it is not at risk. Therefore, the public benefits of the scheme would not outweigh the level of harm identified.

Turning to whether the proposals are considered to be enabling works, as part of the application an ‘Enabling Works – Viability Appraisal’ has been submitted which seeks to provide a justification as to why the Local Planning Authority should set aside its normal Development plan policies and allow the erection of two new dwellings, namely, that the income from the sale of these two properties would fund the repair and maintenance of the Grade II Smallburgh Hall.

As part of the appraisal a schedule of repairs which identifies the scope and nature of the works required to the listed building has been produced together with a schedule of repair costs. In addition the cost of the new build works have also been provided as well as the anticipated sales value for the new properties, which is based on a median value taken from valuations by two local agents.

Whilst too numerous to mention in this report in full, the works identified are generally repairs relating to the roof, chimney, rainwater goods, joinery and external brickwork defects, together with remediation for internal dampness, problems with the driveway and replacement of the currently inefficient heating system and addressing plumbing issues.

This information together with costings and valuation details have been assessed by the Council’s independent Property Consultant who has concluded that the inclusion of the driveway and central heating as part of the enabling case, whilst desirable, cannot be regarded as essential repairs in order to simply protect the fabric of the listed building and maintain its structural integrity and water tightness. However the consultant does agree that the cost of the enabling development together with the market value of the development are reasonable estimates. Furthermore the surplus generated by the development is broadly equivalent to the cost of repairs required to the hall.

Notwithstanding the views of the independent property consultant, one of the central tenets of enabling development is that it is very much a last resort mechanism having explored all other possibilities to secure the optimum viable use of the listed heritage asset. In this case, no evidence has been provided to suggest that any alternatives have been explored or whether any other sources of investment are available. In addition, although the submitted schedule of repairs identifies a significant want of repair the majority of these works would appear to fall under the heading of building maintenance and are not dissimilar to many other historic properties. Furthermore, whilst cumulatively the cost of the identified works are considerable, these would appear to be the result of years of under investment rather than any exceptional needs of the heritage asset.

The National Planning Policy Framework paragraph 202 states that “*Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies*”. In addition the policy contained in the Historic England publication ‘Enabling Development and the Conservation of Significance Places’ published in September 2008 indicates that enabling development that would secure the future of a significant place, but contravene other planning policy objectives, should be unacceptable unless:

- a. *it will not materially harm the heritage values of the place or its setting*
- b. *it avoids detrimental fragmentation of management of the place*
- c. *it will secure the long-term future of the place and, where applicable, its continued use for a sympathetic purpose*
- d. *it is necessary to resolve problems arising from the inherent needs of the place, rather than the circumstances of the present owner, or the purchase price paid*
- e. *sufficient subsidy is not available from any other source*
- f. *it is demonstrated that the amount of enabling development is the minimum necessary to secure the future of the place, and that its form minimises harm to other public interests*
- g. *the public benefit of securing the future of the significant place through such enabling development decisively outweighs the disbenefits of breaching other public policies.*

As discussed above, less than substantial harm would be caused to the setting of the existing listed building and that the public benefits accruing from the scheme do not outweigh this harm. As such the proposal would not accord with the requirements of paragraph 196 of the NPPF or Section 66 of Planning (Listed Buildings & Conservation Areas) Act, 1990. Furthermore, it is the opinion of officers that whilst the viability appraisal identifies a significant want of repairs these work would appear to fall under the heading of building maintenance and are not dissimilar to many other historic properties, and are the result of under investment in the ongoing maintenance of the property rather than, as a result of structural failure or the inherent needs of the heritage asset.

In conclusion, insufficient justification of the special circumstances of this case has been made to warrant a departure from policy on the grounds of enabling development. The proposals are considered to be contrary to policies EN8 and Section 66 of the Planning (Listed Buildings and Conservation Areas) Act, 1990.

3. Layout and Design

With regard to layout the proposed development comprises two dwellings sited parallel to Hall Drive with individual accesses to each property and gravelled driveways to the frontage of each. Such an arrangement pays very little regard to the layout and form of other dwellings in the vicinity of the site which are primarily derived from converted buildings or are smaller farm workers cottages set in and around Old Hall Farm with a very distinctive historical character, form and layout.

As far as the elevational treatment of the dwellings is proposed, they have been designed to appear as barns with their walls consisting of horizontal timber boarding set on brick plinths under clay pantile roofs. Such an approach is not considered to represent the local or north Norfolk vernacular, where traditional barns are primarily of red brick and flint under clay or thatched roofs. This aside, the elevations on the whole display acceptable proportions and offer a reasonable level of visual interest.

It is therefore considered that the scheme as proposed would fail to accord with policy EN4 and the North Norfolk Design Guide.

4. Amenity

The layout of the dwellings would not give rise to any significant issues of overlooking or loss of light between the two proposed dwellings or in relation to other properties in the vicinity of the site.

As far as private garden areas are concerned it is intended that these amenity spaces would be broken down into a number of smaller elements with lawns interspersed with planting and a wildlife pond to the frontage of the site between the two dwellings. However, the actual level of usable private garden area particular for the dwelling to plot two would be minimal and would be heavily overshadowed by trees around the edges of the site. As a result it not considered that this would accord with the guidance contained in the North Norfolk Design Guide which suggests that *“the level of private garden area should be of an adequate size and shape to serve their intended purpose and reflect the likely number of occupants. Furthermore it should be substantially free from shading from trees and buildings during the year”*.

It is therefore considered that there is a lack of adequate usable private garden area to serve the dwellings, particularly plot two, and if accepted in its present form would likely result in requests from future residents seeking the removal of trees in order to increase direct light to their properties and garden areas. It is therefore considered that the scheme as proposed would fail to accord with policy EN4 and the North Norfolk Design Guide.

5. Highways and parking

As part of the scheme it is proposed that access onto Hall Road from Hall Drive (a private road) will be altered so as to have a single point of entry to the north of an existing tree. However at the present time visibility from the access in a northerly direction is restricted by a length of existing hedgerow. It is therefore proposed to remove the existing hedge, lower the bank and remove a tree in order to provide the required visibility. Although this land is currently outside the applicant’s control the agent has indicated that discussions are taking place in respect of the possible lease or purchase of the land necessary to provide a visibility of 160 metres.

The Highways Authority has indicated that this would provide sufficient betterment to overcome previous concerns in respect of highway safety. However, provision of the required visibility splays, would need to be secured via a Section 106 agreement as the land required to provide them is outside the applicant’s control. In the absence of any such agreement, the development could not be implemented and as such should be refused on this basis as it is contrary to policy CT 5.

As far as car parking within the site is concerned this would accord with the requirements of the Parking standards contained in the Core Strategy and the proposal is considered to be in accordance with the requirements of policy CT 6.

6. Trees and landscaping

Aerial photographs taken in 2014 show the site as being densely wooded. In addition the site is designated as a Deciduous Woodland Priority Habitat on the Government's geographical information mapping system. However at the time officers visited the site in November 2016 in response to a pre-application enquiry for the development of the site it was clear that a significant number of trees within the site had been felled and the roots removed in order to create a clearing for the siting of the proposed dwellings. Furthermore, at that time it was not apparent that a formal felling licence was issued by the Forestry Commission which would have required some form of replanting for the area.

Given the landscape importance of this group of trees together with those to either side of Hall Drive and at the entrance off Hall Road the Council served a Woodland Tree Preservation Order (TPO) to protect the remaining trees and ensure that the site is maintained as a woodland as the Order protects seedlings and saplings that will regenerate naturally on the site. In addition, the Order will prevent mowing or site clearance as it would be an offence to damage or remove the seedlings or saplings.

The tree survey and report submitted as part of the application suggests that a further five Sycamore trees are considered to be a constraint to any development of the site whilst a further five Sycamores and one Beech should be removed and replaced due to their poor condition. The report also points to the fact that given the size and density of the remaining trees, future residents of the dwellings may want to reduce the height of, or remove trees completely in order to increase direct light to their properties and reduce shading.

In view of the protection afforded to the trees and the potential development pressure on the remaining trees it is considered that development of the site will not only have an adverse impact on the regeneration of trees within the site but will also have an adverse impact on the wider landscape. The proposal is therefore considered to be contrary to Policies EN2 and EN4 of the Core Strategy.

Conclusion

The site is situated within an area designated as Countryside where there is a general presumption against open market residential development where there are no services and poor access to a full range of basic services. As such it is considered that the development would not be sustainable and the occupiers of the dwellings would be dependent on the car to be able to reach even basic services.

The applicant has indicated that the development is necessary in order to fund the repair and maintenance of Smallburgh Hall and has submitted an 'Enabling Works – Viability Appraisal' in order to justify why the Local Planning Authority should set aside its normal Development plan policies. This has been assessed by an independent property consultant who confirms that the surplus generated by the development is broadly equivalent to the cost of repairs required to the hall.

Notwithstanding this officers are of the opinion that although the submitted schedule of repairs identifies a significant want of repair the majority of these work would appear to fall under the heading of building maintenance and are not dissimilar to many other historic properties. Furthermore, whilst cumulatively the cost of the identified works are considerable, these would appear to be the result of years of under investment rather than any exceptional needs of the heritage asset.

As such it is the opinion of officers that, as required by the NPPF paragraph 202, the disbenefits of departing from Development plan policy are not outweighed by securing the future of this heritage asset, and that as such, permission should be refused.

A further consideration is the fact that the site is located on the approach driveway to two Grade II listed building Old Hall Farm and Smallburgh Hall and their associated building and it is considered the addition of two dwellings in this location would not enhance the setting of these heritage assets and would lead be a level of 'less than substantial'. Furthermore, the site is the subject of a Tree Preservation Order and is a Deciduous Woodland Priority Habitat and it is considered that the level of potential tree loss and works required to allow for the proposed development would have a significant detrimental impact on the protected trees and their regeneration together with the visual amenities of the wider landscape.

In addition bases on the proposed layout there would be a lack of adequate usable private garden area to serve the needs of the dwellings and that if accepted in its present form would result in requests from future residents seeking the removal of trees in order to increase direct light to their properties and garden areas.

Finally, although the Highways Authority has indicated improvements to the access off Hall Road would provide sufficient betterment to overcome previous concerns in respect of highway safety, some of the land required to provide the visibility splays is outside the applicant's control and would need to be secured via a Section 106 agreement. In the absence of any such agreement, the development could not be implemented.

RECOMMENDATION:

Refuse planning permission on the following grounds:

The District Council adopted the North Norfolk Core Strategy on 24 September 2008, and subsequently adopted Policy HO9 on 23 February 2011, for all planning purposes. The following policy statements are considered relevant to the proposed development:

Policy SS 1: Spatial Strategy for North Norfolk
Policy SS2: Development in the Countryside
Policy EN 2: Protection and enhancement of landscape and settlement character
Policy EN 4: Design
Policy EN 8: Protecting and enhancing the historic environment
Policy CT 5: The transport impact on new development

National Planning Policy Framework

Paragraphs 79, 196 and 202.

The proposed dwellings would be within an area designated as Countryside where there is a general presumption against residential development and in a location with no services and poor access to a full range of basic services. The future occupiers would therefore be dependent on the car to be able to reach such services. The proposal would therefore not be sustainable development. In the opinion of the Local Planning Authority there is no justification under the special circumstances in paragraph 79 or 202 of the NPPF to permit the erection of the additional dwellings in the Countryside contrary to policies SS 1 and SS 2 of the adopted North Norfolk Core Strategy.

Furthermore, it is considered that the location of the dwellings on the approach driveway to two Grade II listed building and their associated building would not enhance the setting of these heritage assets and that there would be a level of 'less than substantial'. It is also considered that as required by paragraph 196 of the NPPF that the applicant has failed to satisfactorily demonstrate that the public benefits accruing from the development outweigh this harm.

In addition the site is the subject of a Tree Preservation Order and is a Deciduous Woodland Priority Habitat and it is considered that the level of potential tree loss and works required to allow for the proposed development would have a significant detrimental impact on the protected trees and their regeneration together with the visual amenities of the wider landscape. It is also considered that bases on the proposed layout there would be a lack of adequate usable private garden area to serve the needs of the dwellings and that if accepted in its present form would result in requests from future residents seeking the removal of trees in order to increase direct light to their properties and garden areas. The proposal is therefore considered to be contrary to Policies EN2 and EN4 of the Core Strategy.

Finally, the provision of the visibility splay to the north of the entrance is on land outside the applicant's control and could not be implemented without a legal agreement. In the absence of such an agreement, the Local Planning Authority considers that the applicant has failed to demonstrate that they control sufficient land to provide acceptable visibility splays. The Local Planning Authority therefore considers there to be insufficient information in order to determine if appropriate access can be achieved without causing detriment to highway safety contrary to the requirements of Policy CT5

The proposal is therefore contrary to the above Development Plan policies.

(6) **APPLICATIONS RECOMMENDED FOR A SITE INSPECTION**

There are no recommended site inspections at the time of publication of this agenda.

APPEALS SECTION

(7) **NEW APPEALS**

BODHAM - PO/17/2115 - Erection of detached single story dwelling (outline application with all matters reserved); 15 Hart Lane, Bodham, Holt, NR25 6NT for V Jay

WRITTEN REPRESENTATIONS

HIGH KELLING - PF/18/1177 - Conversion and extension of existing garage to provide annexe accommodation; Tudor Lodge, Vale Road, High Kelling, Holt, NR25 6RA for Mr & Mrs Holloway

FAST TRACK - HOUSEHOLDER

HOLT - PO/18/0061 - Erection of single storey dwelling - outline (details of access only); Highgate, Norwich Road, Holt, NR25 6SW for Mr & Mrs Bond

WRITTEN REPRESENTATIONS

(8) **INQUIRIES AND HEARINGS - PROGRESS**

TUNSTEAD - PF/17/0428 - Change of use from Agricultural to General Industrial (Class B2) (retrospective); Unit 13, Beeches Farm, Crowgate Street, Tunstead, NORWICH, NR12 8RF for Mr Platten

PUBLIC INQUIRY 25 September 2018

**ALBY WITH THWAITE - ENF/17/0201 - Static caravan used for full residential purposes; Thwaite Hill Farm, Middle Hill, Thwaite Road, Alby, NR11 7PN
PUBLIC INQUIRY 29 January 2019**

**TUNSTEAD - ENF/15/0067 - Unauthorised commercial uses of former agricultural buildings; Beeches Farm, Crowgate Street, Tunstead, Norwich, NR12 8RF
PUBLIC INQUIRY 08 November 2018**

(9) WRITTEN REPRESENTATIONS APPEALS - IN HAND

HIGH KELLING - PF/18/1177 - Conversion and extension of existing garage to provide annexe accommodation; Tudor Lodge, Vale Road, High Kelling, Holt, NR25 6RA for Mr & Mrs Holloway

FAKENHAM - ENF/17/0216 - Building works not in accordance of the approved plans- ref PF/16/0858; 6 Whitelands, Fakenham, NR21 8EN

MELTON CONSTABLE - ENF/16/0086 - Unauthorised works to listed building; Bath House, Melton Park, Dereham Road, Melton Constable, NR24 2NG

MELTON CONSTABLE - ENF/16/0087 - Removal of Clock Mechanism - Listed Building; Clock Tower, Melton Constable Hall, Dereham Road, Melton Constable, NR24 2NQ

MELTON CONSTABLE - ENF/16/0088 - Removal of Cupola - Listed Building; Fire Engine House, Melton Constable Hall, Melton Park, Dereham Road, Melton Constable, NR24 2NQ

(10) APPEAL DECISIONS - RESULTS AND SUMMARIES

**FAKENHAM - PO/17/1554 - Outline planning permission for the erection of single storey dwelling (including matters of access, layout and scale); 209 Norwich Road, Fakenham, NR21 8LR for Mr & Mrs MacBrayne
APPEAL DECISION:- APPEAL DISMISSED**

**FAKENHAM - PF/17/1599 - Erection of single storey detached dwelling; The Housekeepers Bungalow, Norwich Road, Fakenham, NR21 8LF for Raven Development Co Ltd
APPEAL DECISION:- APPEAL DISMISSED**

Summaries of the above decisions will be reported to the next meeting

**NORTH WALSHAM - PF/17/0902 - Conversion of stable/barn to create dwelling; Agricultural Building, Adjacent to Bells Cottage, Holgate Road, White Horse Common, North Walsham, NR28 9N for Mr F Knights
APPEAL DECISION:- APPEAL ALLOWED
COSTS TO BE DISCUSSED Awarded: £0.00 Against:**

A summary of the above decision is attached at **Appendix 3**.

(11) COURT CASES – PROGRESS AND RESULTS

No change from previous meeting.

NDC Landscape Officer Comments**Assessment of potential and known effects of development (construction and operation) on ecological and geological receptors from Environmental Statement:**Coastal processes and geological features

The Landscape Section have focussed on the assessment of the impacts of the scheme on the coastal processes that have the potential to affect geological and ecological features only, and make no comment on the potential effects and impacts on coastal processes per se.

Potential effects – construction:

1. Increase in suspended sediment concentrations leading to increased turbidity in nearshore waters and dispersion of suspended sediments by tidal currents and waves; and
2. Changes in sea bed level and substrate type due to deposition from suspension, potentially impacting on and changing the features of the Cromer Shoal MCZ.

Potential effects – operation:

1. Buffering of wave energy leading to a reduction in coastal erosion and overtopping;
2. Smothering of geological cliff features by sand placement and subsequent transport;
3. Wind-blown sand affecting the Terminals infrastructure and Bacton and Walcott villages;
4. Change in the provenance of the beach through importation of foreign sediment resulting in changes to the features of Winterton-Dunes Dunes SAC;
5. Changes in wave climate induced by changes in nearshore geometry;
6. Changes in tidal currents induced by changes in nearshore geometry; and
7. Interruption of sediment transport by outfall pipes.

No deposition of silt/clay or fine sand from the sand placement is predicted at the Bacton Chalk Bed feature (part of Cromer Shoal MCZ). A **moderate adverse** impact has been identified on Mundesley Cliffs SSSI and Bacton Cliffs candidate County Geological Site (CCGS) as a result of the effects of the operation of the sand engine, leading to a reduction in the rate of erosion and loss of continuing exposure for geological information and recording. This impact could result in the Conservation Status of the cliffs being down graded from *favourable* to **unfavourable** condition. Mitigation has been identified in the form of pre-construction monitoring, a Scheme of Geological Recording, Monitoring and Management and the monitoring of sediment movement during operation. A further **minor adverse** impact on the provenance of the beach material has also been identified (no mitigation proposed) however; no impact on Winterton-Horsey Dunes SAC was identified because of the distance of the site from the scheme. No other impacts have been identified on coastal processes and geology as a result of the placement or operation of the sand engine, or have been assessed as negligible or beneficial. Mitigation to reduce the impacts of windblown sand on the terminals and villages could include the planting of sand dune vegetation, or stabilisation of sand through the use of brushings or geotextile. The Landscape Section consider that while the planting of marram grass to reduce windblown sand could improve the biodiversity value of the sand engine, the planting of non-native or invasive species (e.g. sea buckthorn) would be inappropriate. This potential impact could be controlled through the use of an appropriately worded condition. **Subject to the above comments, the Landscape Section concurs with the assessment and the recommended mitigation measures, which should be secured via conditions.**

Marine and coastal ecology

Potential effects and impacts – construction:

1. Direct smothering of species in the nourishment zone resulting in the loss of marine species in the intertidal zone and shallow subtidal zone through death or displacement;
2. Direct impact to broad-scale habitats resulting in the loss or change of mixed sediment habitats (and associated infauna (benthic animals that live within the sea bed)) within the nourishment zone;
3. Increase in suspended sediment concentrations leading to impacts on infauna and epibenthos (organisms living on the surface of the sea bed) through effects on feeding and respiratory mechanisms of certain species;
4. Deposition of suspended material during placement leading to changes in sea bed level and substrate type (at MCZ); and
5. Direct or indirect effects on benthic ecology and habitats due to the impact of outfall construction (trenching within the sea bed) resulting in loss of benthic species and changes to water quality. Loss of sessile species attached to existing outfall pipes, which will be removed as a result of installed the new combined outfall pipe.

Potential effects and impacts – operation:

1. Direct smothering of features by sand placement and through subsequent dispersal of the sand alongshore, cross-shore or through wind-driven transport, leading to the displacement and loss of lugworm and whelk;
2. Impact of outfall operation; and
3. Wind-blown sand affecting coastal ecology features such as the sloping area of cliffs leading to the covering up of features (considered within the Terrestrial Ecology section of the ES).

Some **minor adverse** impacts have been identified as a result of the effects of direct smothering in nourishment zone, changes to broad-scale habitats and an increase in suspended sediment concentrations during construction. However no mitigation has been identified. No other impacts have been identified or have been assessed as negligible. **The Landscape Section concur with this assessment.**

Terrestrial ecology

Potential effects and impacts – construction:

1. Direct smothering of species and habitats in the nourishment zone, resulting in the loss and displacement of terrestrial species and habitats; and
2. Effects of construction lighting on bats (from nearby Paston Barn SSSI/SAC), has the potential to displace bats foraging along the cliffs.

Potential effects and impacts – operation:

1. Direct smothering of habitats and species through subsequent dispersal of the sand through wind-driven transport, leading to the displacement and loss of habitat and species.

Some **minor adverse** impacts on habitats have been identified as a result of the effects of direct smothering in nourishment zone and through the dispersal of windblown sand during operation. Within the summary table of potential impacts (Table 10-4, page 200), mitigation specified includes removing vegetation outside of the bird nesting season and during the reptile active season (although any potential impacts on these ecological receptors have not been identified during the

assessment). Furthermore, the mitigation does not include construction lighting, although within the text of Section 10.4.3, it states that the construction lighting will be directed towards the working areas and kept away from the coastline to avoid disturbance to bats and birds using the area. No other impacts have been identified or have been assessed as negligible. **The Landscape Section does not concur with entirety of the assessment of effects on terrestrial ecology (see below).**

Section 10.4.1 (page 198) of the Environmental Statement states that *“the habitat types recorded within the proposed scheme during the 2017 ecological survey are of minor ecological significance and no BAP habitat has been noted”*. The Landscape Section does not agree with this assessment and considers that the soft cliffs at Bacton fall within the description of *Maritime Cliff and Slope*, formerly a BAP habitat and now a Priority Habitat under Section 41 of the NERC Act, and also subject to a Norfolk Habitat Action Plan under the Norfolk Biodiversity Partnership. The assessment fails to take into consideration the impact on soft cliff habitat and any potential impacts to the significant invertebrate assemblage associated with that soft cliff habitat. One of the principle threats to the invertebrate fauna of soft cliffs is the disruption of the natural processes of erosion and land slippage that maintains the habitats on which the species depend. **The Landscape Section consider that further consideration should be given to assessing and potentially mitigating the impacts of the scheme on these identified ecological features.**

[Further comment has been provided on this matter by the environmental consultant who compiled the Environmental Statement. While the Maritime Cliff and Slopes Priority Habitat as identified in the Norfolk Biodiversity Action Plan is present within the study area from Mundesley to Bacton the habitat has been principally recognised for its geological interest with other areas of soft cliff habitat recognised for biological interest further along the coast. Although not referred to in the Geological section of the ES, it is considered that the impacts on geology have been fully considered through the cliffs status as a SSSI and candidate County Geological Site, with suitable mitigation proposed.]

Marine mammals

Potential effects and impacts – construction:

1. Disturbance impacts to cetaceans (porpoises, dolphins and whales) and pinnipeds (seals) from underwater noise associated with dredging vessels transporting material to and from aggregate extraction site and through the dredging of material¹. Potentially leading to the disturbance of marine mammals and resulting in detection, avoidance and masking (the obscuring of sounds of interest by interfering sounds at similar frequencies). Physiological damage (i.e. tissue damage/hearing loss, either temporary or permanent) from underwater noise transmitted by vessels is considered unlikely.
2. Increased risk of vessel collision risk; and
3. In-direct disturbance (particularly at breeding and moult periods) at seal haul-out sites from vessels.

Potential effects and impacts – operation:

1. Additional impacts on marine mammals as a result of operation of the sand engine scheme are considered unlikely.

¹ The assessment of impacts caused by increased underwater noise through the dredging of material will have been undertaken as part of the Aggregate Site Licence process.

A negligible to **minor adverse** impact on harbour porpoise, grey seal and harbour seal, as a result of disturbance from underwater noise, has been identified based on a 'worst-case' assessment of the number of individuals expected within the study area. Mitigation has not been identified in the ES, although Section 2.6 (page 18) specifies that a transport corridor through which vessels will access the working zones for the project will be determined once a contractor has been identified to minimise disturbance to other users. The Landscape Section recommend that the specification and routing of the transport corridor should take into consideration mitigating the potential for disturbance to marine mammals and increased collision risk, as well as disturbance to 'other users', particularly given the presence of the Southern North Sea cSAC designated site within the scheme footprint. A negligible to **minor adverse** impact on harbour porpoise, grey seal and harbour seal, as a result of an increased collision risk, has been identified based on a 'worst-case' assessment of the number of individuals expected within the study area. Although no specific mitigation has been identified, section 11.5.2 (page 214) suggests that vessel movements will be incorporated into recognised vessel routes (offshore) to reduce any disturbance and collision risk and that vessel operators will use good practice to reduce the risk of collisions with marine mammals. This mitigation could be written into a Construction Environment Management Plan (CEMP) secured as part of a condition of planning. No other impacts that have been identified or have been assessed as negligible. **Subject to the above comments and recommended conditions, the Landscape Section concur with this assessment.**

[Further comment has been provided on this matter by the environmental consultant who compiled the Environmental Statement. The final route would be agreed with the Contractor, also taking into consideration vessel drafts, etc. and the CEMP will outline the constraints. It is difficult to prescribe a route with regard to avoiding impacts on marine mammals, this is more of a vessel speed issue and dredging vessels are not fast moving. Appropriate routes will be devised to ensure consistency of vessel movements. Other users will also be considered in the siting of the route.]

Ornithology

In addition to the species protected under the designated site status of Great Yarmouth and North Denes SPA and the Greater Wash SPA (little, common and Sandwich terns), ringed plover and sand martin have also been scoped into the assessment of potential effects of ornithological features.

Potential effects and impacts – construction:

1. Increase in suspended sediment concentrations impacting on bird foraging activity through the potential loss of prey species (infauna and epibenthos) and also through reduced visibility in the water column;
2. Smothering of nests (on beach and cliff face) due to sand placement resulting in direct mortality or reduction in productivity of beach and cliff nesting birds;
3. Direct disturbance from vessel transits to and from aggregate extraction site; and
4. Increase in suspended sediment concentrations affecting the distribution and abundance of the fish and shellfish resource leading to a loss of prey resources².

Potential effects and impacts – operation:

1. Smothering of features by subsequent transport of deposited sand.

² Impact assessed in Section 9 (Marine and Coastal Ecology) of Environmental Statement, **minor adverse** impact expected, no mitigation suggested.

A **moderate adverse** impact is predicted on nesting sand martin within the nourishment zone. Mitigation is proposed which includes pre-construction surveys and the use of a fine mesh netting or geotextile to discourage birds to attempt to nest in the cliff face.

The Environmental Statement (section 12.5, page 233) suggests that beach nesting birds (ringed plover and little tern) are not expected to be nesting in the area affected directly by the placement of sand, due to the amount of human disturbance occurring within the scheme area. However, the walkover survey was undertaken outside of the bird breeding season, which does not allow for a survey for these species nesting at the site. Furthermore, the assessment utilised other beach nesting bird data that was based on the monitoring of recognised breeding sites and not the whole of the coast, therefore there is the possibility that despite the presence of human disturbance these birds may be nesting within the nourishment zone. To mitigate for the potential impact on nesting birds, a pre-commencement survey and on-going survey for nesting birds is therefore recommended, which could be secured as part of a CEMP condition.

Furthermore, while a **minor adverse** impact was predicted on the intertidal and shallow subtidal benthic and fish species, including the prey species lugworm, resulting from direct smothering and increased suspended sediments, a **negligible** impact on foraging little tern and ringed plover was returned. This assessment was based on the distance of the scheme to the nearest known breeding sites (of which Eccles-on-Sea is less than 8km), the high availability of other foraging sites and the relatively low numbers of breeding pairs, together with the short term and temporary nature of the potential impact. However, the Landscape Section suggests that there is the potential that the colony of little tern at Eccles utilise the area affected by the sand engine for foraging and recommend that foraging monitoring of the little tern colony is undertaken during construction to identify any potential impacts and required mitigation. This could be secured through a CEMP condition.

Subject to the above comments and recommended conditions, the Landscape Section concur with this assessment.

[Further comment has been provided on this matter by the environmental consultant who compiled the Environmental Statement. Any foraging little terns from established breeding colonies would be outside of the mean of the maximum flight distance that they are known to use and this is not therefore considered to be a prime foraging area. Works will be undertaken in discreet areas which leaves large adjacent areas still available for foraging. Any disturbance to little terns that did occur would therefore only occur to a very small number of little tern and within a highly localised area for a short duration. Given the distance from the established breeding colonies, the localised and temporary nature of the works area and the availability of adjacent suitable habitat, it is considered that any effects would be negligible. It is not considered that the works would give rise to a significant impact on little terns. This explanation is agreed with by the LPA].

General comments on Environmental Assessment

The magnitude of the identified effects are influenced by the place, time and size of the development/sand engine scheme, the type of sediment and the strategy for the placement activity.

The effects and resultant impacts can occur during placement (construction and associated operations) and operation of the sand engine. The exact details for the placement of the sand are currently unknown (as a contractor has yet to be appointed for the development and they will ultimately determine the construction details) therefore the assessment of the effects of the

development have been based on expected / likely operations based on existing operations and best practice. The potential impacts on ecological and geological features have been assessed using a number of numerical modelling techniques based on known parameters, best practice and assumed effects.

Given that the effect of the scheme have been based on modelling data and predicted scenarios and assumptions, it is reasonable to request, as part of any consenting process, a scheme of comprehensive monitoring of the scheme. This will assist in the identification of any unexpected or increased impacts of the scheme and can help inform further mitigation/compensation requirements if required, as well as informing future re-nourishment or 'top up' schemes. Furthermore, it is not unreasonable to accede to the recommendations and requirements of the RSPB for monitoring of little tern foraging activities during construction.

Assessment of effects on designated sites and protected species:

The Landscape Section considers that the development has the potential to impact on a number of sensitive ecological and geological features protected under national and international legislation. These are summarised in the table below (Table 1). The following European sites were scoped out of the HRA process: Haisborough, Hammond and Winterton cSAC, Overstrand Cliffs SAC and The Broads SAC. The North Norfolk Coast SPA was scoped out of the process although impacts to ringed plover and little tern (features of the NNC SPA) were considered because of the potential connectivity with the scheme due to the ecological characteristics of the birds and the potential for them to be found within the study area. The Outer Thames SPA was not scoped into the HRA assessment although impacts on red-throated diver are considered as part of the Environmental Assessment.

Table 1 Impacts on International, European and national designated sites for nature conservation and protected species.

Site/Species Name	Approx. distance from sand engine (km)	Sensitive features with the potential to be affected by the development	Potential Impacts	Identified impact (from Environmental Assessment)	Mitigation/Monitoring	Considered further for LSE ³ as part of Habitats Regulations Assessment
Greater Wash SPA	0 (MHW)	Red-throated diver (non-breeding) Little gull (non-breeding) Little tern (breeding) Sandwich tern (breeding) Common tern (breeding)	Direct Impact: <ul style="list-style-type: none"> Direct disturbance (foraging birds) from vessel movements; and Displacement of foraging birds through loss or obscuring of prey species in sea, due to increases in suspended sediment and turbidity. 	<ul style="list-style-type: none"> No LSE impact identified for foraging little tern, therefore further assessment was not required as part of the HRA. Negligible impact identified for the displacement of foraging birds. No impacts identified on breeding sandwich tern and common tern, or red-throated diver and little gull, due to the distance from site of the breeding colonies, lack of receptor pathway and works not taking place over winter. 	None identified (see previous text for Landscape Section's comments on mitigation/monitoring requirements)	Yes (for little tern)

³ Likely Significant Effect

Site/Species Name	Approx. distance from sand engine (km)	Sensitive features with the potential to be affected by the development	Potential Impacts	Identified impact (from Environmental Assessment)	Mitigation/Monitoring	Considered further for LSE ⁴ as part of Habitats Regulations Assessment
Southern North Sea cSAC	0 (MLW – subtidal area)	Harbour porpoise	<p>Direct Impact:</p> <ul style="list-style-type: none"> Noise disturbance to harbour porpoise Collision risk to harbour porpoise from transport to and from licensing dredging site Displacement of hunting harbour porpoise through loss or obscuring of prey species in sea, due to increases in suspended sediment 	<ul style="list-style-type: none"> No LSE identified. Only negligible impacts were identified for harbour porpoise in the test for LSE, therefore further assessment was not required as part of the HRA. Negligible to minor adverse impacts identified for noise disturbance, collision risk and the displacement of marine mammals. 	None identified (see previous text for Landscape Section’s comments on mitigation/monitoring requirements including constraining vessel movements to recognised routes)	Yes (for harbour porpoise)

⁴ Likely Significant Effect

Site/Species Name	Approx. distance from sand engine (km)	Sensitive features with the potential to be affected by the development	Potential Impacts	Identified impact (from Environmental Assessment)	Mitigation/Monitoring	Considered further for LSE ⁵ as part of Habitats Regulations Assessment
Paston Great Barn SAC	1	Maternity colony of Barbastelle bats	Direct Impact: <ul style="list-style-type: none"> Displacement of foraging bats along cliffs due to noise and light disturbance during construction Potential loss of foraging habitat during operation 	None identified due to: <ul style="list-style-type: none"> Temporary nature of works and availability of suitable alternative foraging sites in vicinity; and Retention of cliff face following completion of sand nourishment. 	None identified (see previous text for Landscape Section's comments on mitigation requirements including the precautionary measure: construction lighting directed to operational zone only and away from cliffs)	No
Broadland SPA/Ramsar	7	Migratory, over-wintering and breeding birds	Direct Impact: <ul style="list-style-type: none"> Displacement of foraging birds through loss of prey species in sea. 	None identified due to: <ul style="list-style-type: none"> Works not taking place in the over-wintering period. No receptor pathway to breeding birds. 	Not applicable	No

⁵ Likely Significant Effect

Site/Species Name	Approx. distance from sand engine (km)	Sensitive features with the potential to be affected by the development	Potential Impacts	Identified impact (from Environmental Assessment)	Mitigation/Monitoring	Considered further for LSE ⁶ as part of Habitats Regulations Assessment
Great Yarmouth North Denes SPA (also includes breeding colony at Eccles-on-sea, which although outside the SPA boundary is functionally linked to SPA)	16	Little Tern (breeding)	<p>Direct Impact:</p> <ul style="list-style-type: none"> Displacement of foraging birds through loss or obscuring of prey species in sea, due to increases in suspended sediment and turbidity; Loss of suitable habitat for breeding; and Direct disturbance (foraging birds) from vessel movements. 	<ul style="list-style-type: none"> No LSE impact identified for foraging or breeding little tern, therefore further assessment was not required as part of the HRA. Negligible impact identified for the displacement of foraging birds. No impact on habitat availability for breeding birds. 	None identified (see previous text for Landscape Section's comments on mitigation/monitoring requirements, including the monitoring of sediment movement)	Yes (for little tern)
Winterton-Horseley Dunes SAC	16	Sand dune habitat	<p>Direct Impact:</p> <ul style="list-style-type: none"> Loss of interest features due to changes in movement of sediment, patterns of erosion and deposition down drift of scheme. 	<ul style="list-style-type: none"> No LSE identified due to the likelihood that significant quantities of dispersed sediment from the sand engine will not reach the beaches in front of the dunes, therefore further assessment was not required as part of the HRA. No predicted impact on habitat or loss of interest features. 	Not applicable	Yes (for dune habitat features)

⁶ Likely Significant Effect

Site/Species Name	Approx. distance from sand engine (km)	Sensitive features with the potential to be affected by the development	Potential Impacts	Identified impact (from Environmental Assessment)	Mitigation/Monitoring	Considered further for LSE ⁷ as part of Habitats Regulations Assessment
Outer Thames Estuary SPA	26	Red Throated Diver (over-wintering)	Direct Impact: <ul style="list-style-type: none"> Displacement of foraging birds through loss of prey species in sea 	None identified due to: <ul style="list-style-type: none"> Distance of SPA from nourishment zone and expected sediment transport distances; and Works taking not taking place in the over-wintering period. 	Not applicable	Not included in HRA (due to distance from scheme).
Mundesley Cliffs SSSI	0	Geological interest features	Direct Impact: <ul style="list-style-type: none"> Covering up (obscuring) of geological interest features (loss of recording ability) Cut off from coastal processes (leading to damage of interest features) 	<ul style="list-style-type: none"> Moderate adverse impact identified 	Pre-construction surveys. Scheme of Geological Recording, Monitoring and Management. Monitoring of sediment movement	Not applicable

⁷ Likely Significant Effect

Site/Species Name	Approx. distance from sand engine (km)	Sensitive features with the potential to be affected by the development	Potential Impacts	Identified impact (from Environmental Assessment)	Mitigation/Monitoring	Considered further for LSE ⁸ as part of Habitats Regulations Assessment
Cromer Shoal MCZ	0.2 (from Low Water Mark)	Bacton subtidal chalk bed (feature identified within zone of influence)	<p>Direct Impact:</p> <ul style="list-style-type: none"> • Trenching of outfall pipe into sea bed; • Increases in suspended sediment leading to deposition and covering up of interest features; and • Damage to MCZ features through anchoring of flexible pipeline. 	<ul style="list-style-type: none"> • No impact identified on the MCZ features (chalk bed) from trenching of outfall pipe as only sandy substrate is expected in the trenching area; and • No impact identified on the MCZ features (chalk bed) from increases in suspended sediment concentrations due to the relative dissipation of sediment before it reaches the MCZ boundary/features. • No impact identified on the MCZ features (chalk bed) from the anchoring of flexible pipeline subject to the provision of a 200m-exclusion zone applied around chalk bed feature. 	<p>Exclusion zone (for trenching and anchoring operations) around areas of identified chalk bed.</p> <p>Monitoring of sediment movement</p>	Not applicable

⁸ Likely Significant Effect

Site/Species Name	Approx. distance from sand engine (km)	Sensitive features with the potential to be affected by the development	Potential Impacts	Identified impact (from Environmental Assessment)	Mitigation/Monitoring	Considered further for LSE ⁹ as part of Habitats Regulations Assessment
Paston Great Barn SSSI	1	Maternity colony of Barbastelle bats and roosts of several other bat species	Direct Impact: <ul style="list-style-type: none"> Displacement of foraging bats along cliffs due to noise and light disturbance 	None identified due to: <ul style="list-style-type: none"> Temporary nature of works and availability of suitable alternative foraging sites in vicinity; and Retention of cliff face following completion of sand nourishment. 	None identified (see previous text for Landscape Section's comments on mitigation requirements including the precautionary measure: construction lighting directed to operational zone only and away from cliffs)	Not applicable
Trimmingham & Sidestrand SSSI	2.6	Geological interest features	Direct Impact: <ul style="list-style-type: none"> Cut off from coastal processes (leading to damage of interest features) 	<ul style="list-style-type: none"> None identified: as the predicted changes to beach morphology are only likely to extend 3km to the north of the sand engine and lack the sufficient volumes of sand to impact on the coastal processes and geological exposures. 	Not applicable	Not applicable

⁹ Likely Significant Effect

Site/Species Name	Approx. distance from sand engine (km)	Sensitive features with the potential to be affected by the development	Potential Impacts	Identified impact (from Environmental Assessment)	Mitigation/Monitoring	Considered further for LSE ¹⁰ as part of Habitats Regulations Assessment
Bacton Cliffs candidate CGS	0	Geological interest features	Direct Impact: <ul style="list-style-type: none"> Covering up (obscuring) of geological interest features (loss of recording ability) Cut off from coastal processes (leading to damage of interest features) 	<ul style="list-style-type: none"> Moderate adverse impact identified. 	Pre-construction surveys. Scheme of Geological Recording, Monitoring and Management. Monitoring of sediment movement.	Not applicable
Sand martins	n/a	Breeding in cliffs	Direct Impact: <ul style="list-style-type: none"> Disturbance and displacement of breeding birds in cliffs 	<ul style="list-style-type: none"> Moderate adverse impact identified 	Pre-construction surveys. Installation of <i>approved</i> netting across the area of cliff affected by sand placement	Not applicable

¹⁰ Likely Significant Effect

Site/Species Name	Approx. distance from sand engine (km)	Sensitive features with the potential to be affected by the development	Potential Impacts	Identified impact (from Environmental Assessment)	Mitigation/Monitoring	Considered further for LSE ¹¹ as part of Habitats Regulations Assessment
Ringed plover	n/a	Breeding and foraging on beaches	Direct Impact: <ul style="list-style-type: none"> Disturbance and displacement of breeding and foraging birds on beach 	<ul style="list-style-type: none"> Negligible impact identified for the displacement of foraging birds. 	None identified (see previous text for Landscape Section's comments on mitigation/monitoring requirements, including the monitoring of sediment movement)	No
Little tern	n/a	Breeding on beaches and foraging in sea	Direct Impact: <ul style="list-style-type: none"> Displacement of foraging birds through loss or obscuring of prey species in sea, due to increases in suspended sediment 	<ul style="list-style-type: none"> Negligible impact identified for the displacement of foraging birds. 	None identified (see previous text for Landscape Section's comments on mitigation/monitoring requirements, including the monitoring of sediment movement)	Yes, included as is a feature of several SPAs

¹¹ Likely Significant Effect

Assessment of potential and known effects of development (construction and operation) on landscape and visual amenity from Environmental Statement:

Landscape and Visual Amenity

Potential effects and impacts – construction:

1. Visual Impact for local residents and tourists; and
2. Impact on site character.

Potential effects and impacts – operation:

1. Visual Impact.

A **minor/moderate adverse/beneficial** impact has been identified on the visual amenity for local residents and tourists as a result of the effects of the placement of sand in the nourishment zone, as well as a **minor adverse** impact on site character. However no mitigation has been identified. The visual impact of the sand engine once operational is assessed to be **moderate beneficial**. **The Landscape Section concur with this assessment.**

Objection to Planning Application PF/18/1263 -- overview

We are writing to object to the proposal to demolish the former Blakeney Rectory at 8 Wiveton Road and build a new Modernist house in its place.

This objection is both to the demolition of the former Rectory, and to the proposed new structure. Planning permission should be refused because:

- The proposal is not in compliance with multiple elements of NNDC's Local Plan (notably policies EN2, EN4 and EN8 but also policies HO8, EN9 and EN14)
- It would have a negative impact on the setting of the Blakeney Conservation Area (which is described in the Blakeney Conservation Area Appraisal)
- The impact of the application on the "look and feel" of Blakeney fails to respect the views of Blakeney residents as reflected in the draft Blakeney Neighbourhood Plan, and as evidenced by Blakeney Parish Council's opposition to the proposal, and the objections from Blakeney and other residents to the application
- The former Rectory is an important part of the "look and feel" of Blakeney, makes a positive contribution to both the Blakeney and Glaven Valley conservation areas, and is an important, albeit undesignated, heritage asset (as has been demonstrated through an extensive architectural heritage assessment conducted by Oliver Bradbury)
- The applicants' Heritage Impact Assessment contains inaccuracies and incorrect interpretations, on which we have commented separately
- The proposed new dwelling is out of keeping with the village, and uses materials and design forms contrary to the conservation area principles. Its prominent location, in close proximity to St Nicholas' Church, the Old Rectory and its tithe barn, Blakeney Parish School and former school house, and the significantly enlarged footprint proposed, add to the significance of these points

A number of these issues were raised in relation to the previous application (PF/16/1417). The subsequent Judicial Review of that application referred to certain of these issues, but by definition a Judicial Review can only consider the legal process and does not provide a forum for a discussion of the planning judgments themselves. The new application requires assessment and determination from first principles because:

- The new structure is different from the previous proposal – notably it has a far larger footprint which means that its impact, particularly in the sensitive location at the edge of Blakeney and its Conservation Area, will be different
- There is more time to give proper consideration to the points made in the independent architectural historian's report, and the points raised by the numerous Blakeney residents and others who objected to the previous application
- The Neighbourhood Plan Aims and Visions and the Blakeney Conservation Area Appraisal provide a new context in which NNDC should assess the application

To ensure that the application's consideration and determination are properly evidenced, weighted and sound it would appear necessary:

1. to assign a new conservation officer
2. to conduct a full and thorough review of all of the heritage evidence which exists;
3. to conduct a full and thorough inspection of the building;

4. for the Conservation Officer's consultee response to be fully evidenced and referenced and any weighting and balancing exercise to be clearly and logically set out (with full and proper regard paid to NPPF paragraphs 193, 197, 198, 199 and 201).

Further details of our objections are set out below.

Yours,

[Redacted signature block]

Objection to Planning Application PF/18/1263 -- supporting detail

Planning policy concerns

The proposed development is contrary to the Local Plan in several respects, notably:

- HO8 House Extensions and Replacement Dwellings in the Countryside – the proposal would result in an 81% increase in the footprint, this is “disproportionately large” and hence contrary to the policy; the increase is materially in excess of what would be possible under permitted development rights.
- EN2 Protection and Enhancement of Landscape and Settlement Character – the development impacts the setting of the Blakeney Conservation Area and is in the Glaven Valley conservation area. It is sympathetic to neither. The design and many of the materials (in particular large glazed areas, the use of corten steel and a 'feature' roof design resembling nothing in Blakeney) will not protect, conserve or enhance the qualities of the area
- EN4 Design
 - the design does not “[reinforce] local distinctiveness” and does not “preserve or enhance the character and quality of the area”; in particular the scale, large glazed areas, the use of corten steel and the strange roof design are out of keeping with the local context of Blakeney. This is particularly important as the site is very prominent and the first building seen when approaching Blakeney from Wiveton and the south
 - The proposed development constitutes a “[proposal] along [an entrance route] into a settlement” and should have particular regard to its location
- EN8 Protecting and Enhancing the Historic Environment – the proposal impacts the character and appearance of designated assets (i.e. the Glaven Valley Conservation Areas directly and the settings of the Blakeney Conservation Area, St Nicholas Church (Grade I) and the Old Rectory (Grade II*). Contrary to the applicants’ assertions, and as set out in our response to the Heritage Impact Assessment and commentary on the past C&D comments, the current New Rectory building makes a positive contribution to the character and appearance of the Blakeney and Glaven Valley Conservation Areas, because it was built to complement the Old Rectory and because for 94 years it has been an integral part of the 'ecclesiastical precinct' comprising the Church, Blakeney Parish School and the former School House, and the Old Rectory and its tithe barn.
- EN9 Biodiversity & Geology – a greatly enlarged footprint, large glazed expanses, a potentially significant increase in light spillage and vegetation clearance, all in an area previously characterised by mature trees, traditionally proportioned windows and minimal light pollution. These factors are capable of giving rise to a significant ecological impact.
- EN14 Pollution and Hazard Prevention and Minimisation – light pollution is specifically referenced in this policy. No evaluation has been carried out of the light pollution impact of the large glazed areas to the south and west of the proposed building. This design certainly does not “minimise and where possible reduce” light pollution compared either with the current building or other potential designs, and hence is contrary to this policy.

Conservation Area concerns

The site is part of the Glaven Valley Conservation Area and lies immediately adjacent to the Blakeney Conservation Area. Both Conservation Areas are designated Heritage Assets. The 8 Wiveton Road site forms an important part of the setting of the Blakeney Conservation Area – the demolition and new build proposal would have an impact on the Blakeney Conservation Area by virtue of the impact it would have on its setting.

There are a number of elements of the Draft Conservation Area Appraisal and Management Plan (“DCCA”) for Blakeney that are relevant to this case, including at least seven specific elements of the Appraisal with which the proposed new building is entirely inconsistent. These are as follows (our emphasis):

<i>Conservation Area Appraisal reference</i>	<i>Our comments</i>
<p>Page 7</p> <p>It is therefore a requirement under the Planning (Listed Buildings and Conservation Areas) Act 1990 that all local planning authorities ‘formulate and publish proposals for the preservation and enhancement’ of conservation areas within their jurisdiction, and that these proposals are periodically reviewed.</p> <p>Conservation areas may be affected by direct physical change by changes in their setting or in the uses of buildings or areas within them.</p> <p>Often, conservation area boundaries have historically been drawn too tightly or include peripheral areas which do not contribute to an understanding of its character. Consequently it is important to review the boundary and include / exclude buildings and spaces which do / not meet conservation area designation criteria.</p>	<p>Development at 8 Wiveton Road will adversely impact upon the setting of the Blakeney Conservation Area</p> <p>Although we are not aware of any explanation of why the Conservation Area was defined as it was, the DCCA commentary on conservation area boundaries being “drawn too tightly” would seem to apply to 8 Wiveton Road. In our view a 1920s Rectory, designed by a local architect responsible for many buildings in Blakeney, forming an important part of the view into Blakeney, and closely related in its origins and history to the other ecclesiastical buildings nearby, would seem a notable and important omission from the Conservation Area – one that should be rectified.</p> <p>For example, P95 of the DCAA proposes redrawing the boundary to include the War Memorial on New Road, coincidentally also designed by New Rectory architect John Page. The fact that Page is not referred to by name in the listing suggests that Page's contribution to Blakeney's built environment is not properly appreciated by the Council's Conservation and Planning teams</p>
<p>Page 8</p> <p>To protect and enhance the Conservation Area, any changes that take place must positively conserve the character and special interest that make it significant.</p>	<p>Construction of a Modernist building, incorporating novel materials and design elements, will do completely the opposite of this – it is out of keeping with the “character and special interest” of Blakeney</p>

<p>Page 25</p> <p>Definition of Setting The setting of a conservation area provides its physical context, reflecting the landscape character around it. Setting is made up of several elements beyond just topographical or natural parameters; it is also made up of sounds, smells, environmental atmosphere and the way people move around it and experience. It can contribute both positively and negatively to the significance of a site and can provide evidence of the historic context of a place. Views also form part of the contribution to the setting of conservation areas. They may include views from, to, within or across an area, taking into consideration the area’s surroundings, local topography, natural and built features, and relationships between buildings and spaces.</p>	<p>On this definition, the New Rectory is clearly part of the setting of the Blakeney Conservation Area, and the views towards Blakeney from the south and south west (which feature the New Rectory) are part of the “contribution to the setting”</p>
<p>Page 28</p> <p>Many of the views into the Conservation Area from the south give little sense of form of the village, due to the lie of the land with the village proper set down below the rise of Howe Hill. Views along Morston Road, Langham Road and Saxlingham Road instead capture the more modern housing developments lining the roads at the outskirts of the village. Views along Wiveton Road conversely present the viewer with a bank of trees marking the entrance to the village.</p>	<p>These views are likely to be impacted by the demolition and proposed new construction, with the east wall of the proposed property being visible, the mouth of the drive widened, and certain trees being removed. The absence of the existing structure which has been a key feature on this entrance to the village for almost 100 years will be notable, especially as the existing landscape planting ‘falls in’ to frame it.</p>
<p>Page 81</p> <p>The overwhelming majority of buildings and structures in the village contribute positively or are neutral to the Conservation Area.</p> <p>The greatest threat to the character area is the intrusion of modern elements that are out of keeping with the conservation Area, such as timber fencing and solar panels</p>	<p>In this context, it would be hard to argue that the New Rectory does not make a positive contribution or at least is neutral. Whilst it is true that the New Rectory suffers from the addition in the 1990s of inappropriate uPVC windows, these can and should be removed and replica leaded windows reinstated</p> <p>The entire proposed new building is comprised of “modern elements” including corten steel, large glazed areas, a 'feature' gull-wing roof, a large patio area etc. None of these are in keeping with the conservation area.</p>
<p>Page 85</p>	<p>The proposed scale of the new building is out of</p>

<p>Planning legislation allows for buildings of high design quality to be constructed in historically sensitive areas, which enables the continuing evolution of a place whilst ensuring the quality of the environment. Provided the design is of high quality and construction, the materials and style of the new building does not necessarily have to match those of the existing buildings in the area. However, there is a risk in a village like Blakeney that the construction of too many buildings of contrasting design and materials could erode the character of the Conservation Area and it is important that the collective impact of the growing numbers of such buildings is taken into account each time one is proposed. Wherever possible, applicants should be encouraged to make use of sympathetic traditional materials, scale and massing so that new buildings sit harmoniously within the streetscape and the wider Conservation Area. Consideration should also be given to the impact of large areas of glazing in a design of otherwise traditional materials as these can create detrimental blank spaces in views of the village.</p>	<p>keeping both with other buildings in Blakeney and with the New Rectory currently on the site</p> <p>Corten steel, a prominent feature of the proposed design, is not a “sympathetic traditional material”. There is no other building in Blakeney which uses it. While the architect argues that corten steel somehow resembles in its colour traditional Norfolk pantiles, the differences between oxidised steel and traditional pantiles will surely be readily apparent to any normal observer</p> <p>The proposed building features large areas of glazing on the south side, and windows on the east wall, all of which are likely to be highly visible on the approach to Blakeney from Wiveton and will imply significant voids where currently there is the clear presence of sympathetic built form.</p> <p>At night the opposite is likely to be true. The expanses of glass will act like large lanterns, attracting views to an unsympathetic out-of-keeping built form which will leave those arriving by this route ill-informed and potentially confused about the character of the village they are entering.</p>
<p>Page 93</p> <ul style="list-style-type: none"> • Key views within and into the Conservation Area will be preserved. • Views of landmark buildings, particularly the church and Blakeney Hotel, will be preserved. • Views of Blakeney from Wiveton and Cley, and from the surrounding landscape to the south and southwest will be preserved. 	<p>Demolition of the New Rectory will materially change the views of Blakeney from Wiveton and the surrounding landscape. The tall chimneys and distinctive roofline of the New Rectory has been central to this view for 94 years, and so removing it by definition is the opposite of 'preserving' the existing view.</p>

The previous assessment of eligibility of the New Rectory for local listing was in our view profoundly flawed; we have provided comments on that assessment separately. Not least, that assessment was carried out without there being a Conservation Area Appraisal in place to provide context to assess the significance of the building. In any event, whether locally listed or not, in our view, the Rectory makes a positive contribution to the Conservation Area and its setting, and should be preserved to maintain not only the 'look and feel of the village', but the historical and cultural coherence of the Conservation Area itself.

The North Norfolk Design Guide, used by NNDC to assess potential developments in Conservation Areas, also contains guidance relevant to the current application:

<p>6.2 New Development</p> <p>6.2.1 Proposals for new buildings or extensions within Conservation Areas will generally only be permitted if they: -</p> <ul style="list-style-type: none"> • Achieve a high standard of design which is compatible with the character and appearance of the area; • Are compatible with the scale, mass, form and siting of existing buildings and their settings; • Use appropriate materials (see Chapter 10 ‘Materials’); • Include native landscaping that compliments the area (see Chapter 9 ‘Landscape Design’); • Do not result in the loss of important open spaces or features of interest; • Do not impinge upon important views in to, out of, and within a Conservation Area, Incorporate Sustainable Construction principles in a way that is compatible with the character and appearance of the area (see Chapter 11 ‘Sustainable Construction’); and • Provide detailed plans and drawings of the development; Note: Outline planning applications are seldom appropriate in conservation areas as detail is normally an integral part of determination 	<p>In our view, the current proposals should not be permitted under these criteria:</p> <ul style="list-style-type: none"> • The design is not “compatible with the character and appearance” of either Blakeney or Glaven Valley Conservation Areas – it contains several novel features, including a gull-wing roof and the use of corten steel, which have no parallels in existing buildings in the Areas • The design is not compatible with the scale, mass, form or siting of the existing New Rectory or with other buildings in the vicinity Unlike the existing building, which echoes features of the Old Rectory (tall chimneys, high-pitched roof, similar shape of windows and similar leaded windows until most of these were removed in the 1990s and similar roughcast render), the proposed new building does not reflect the buildings near it in any way, other than the use at one point of a thin skin of uncoursed flint, which is not structural (unlike its use in the buildings nearby) and hence is, at best, weak pastiche.
<p>6.4 Demolition</p> <p>6.4.1 Planning and Conservation Area Consent applications involving demolition within a conservation area will normally only be approved if: -</p> <ul style="list-style-type: none"> • The building or structure to be demolished does not make a positive contribution to the area. • There is evidence that every effort has been made to try and save those buildings or structures which do make a positive 	<p>As discussed elsewhere, in our view and in the view of numerous other objectors to the current and previous applications, the New Rectory does make a positive contribution to the area. (Note that the significance of the positive contribution does not need to be determined – any positive contribution is sufficient.)</p> <p>There is certainly no evidence that efforts have been made to save the building, or of any community benefit arising from the demolition</p>

<p>contribution.</p> <ul style="list-style-type: none"> • There would be a community benefit outweighing the loss of those buildings or structures which make a positive contribution. 	<p>outweighing its loss. It is hard to see what community benefit to the village is provided by yet another £1m+ luxury home, particularly when constructing the home entails the demolition of an integral part of Blakeney's historic and locally resonant 'ecclesiastical quarter'</p> <p>Indeed, the benefits will be entirely private. No arguments for public or community benefit have been made or evidenced. This is because there are none. The opposite is true, however. The proposal would represent a significant loss to the community – the loss of a building which was central to the critical milestones in a large proportion of the community's lives, and whose active use is still well remembered in the community.</p> <p>On this basis alone (i.e. the lack of any community benefit) demolition consent should, without doubt, be refused.</p>
<p>6.4.2 From the above, the main theme to emphasise is that everyone needs to work together to secure the best future for the District's Conservation Areas. Hence, owners need to consider the impacts of their alterations on the wider area, whilst developers need to ensure their proposals pay due regard to the established form and character of the area. For its part, the District Council is currently producing appraisals and management plans for its Conservation Areas. It is also under a statutory duty to make sure that all works within a Conservation Area either preserve or enhance that area. As a result, there is an expectation that all proposals should display a high standard of design and be sympathetic with their surroundings. Only in this way, will our designated areas continue to be enjoyed by future generations.</p>	<p>The owners of the New Rectory have not shown true consideration of the impacts of their alterations on the wider area. As has been demonstrated in this and the connected submissions, the proposal is out of keeping with the "established form and character" of both the Blakeney and Glaven Valley Conservation Areas.</p> <p>The District Council has not prepared a conservation appraisal for the Glaven Valley and has only recently finished a draft appraisal for Blakeney. Without such documents in place the Council is in very real danger of making decisions which do not recognise and protect the important characteristics and qualities of these conservation areas. It should therefore adopt the precautionary principle until such time as it has the documents prepared and adopted and can use them to guide and inform decision making and test proposals against. Adopting the precautionary principle in this case means refusing demolition consent to avoid the loss of a building which clearly contributes to the conservation area.</p>

Particularly as, contrary to statutory requirements, NNDC has not yet implemented Conservation Area Appraisals for Blakeney or Glaven Valley, care should be taken to adhere to the Design Guide principles and a conservative, precautionary approach, adopted – at least pending the completion of consultation

on the Appraisals which would enable residents of both Blakeney and Glaven Valley and other consultees to have their views on the character and appearance of the area appropriately reflected.

Negative Impact on the look and feel of Blakeney

The importance of character and appearance to Blakeney residents can be seen in the Neighbourhood Plan process and in residents' reactions to the previous and current proposals for 8 Wiveton Road. The recently-drafted Neighbourhood Plan Aims & Visions statement for Blakeney has demonstrated that retaining 'the look and feel of the village' is a top priority for local residents.

The Parish Council has stated that the proposed replacement structure at 8 Wiveton Road is 'not in keeping with the village', and for that reason objected to it.

There is only one similarly large, modernist house in Blakeney at present, located far away from the historic centre of the village. In contrast, many prominent houses in Blakeney were either constructed by or altered by local architect John Page, who designed the former Rectory. Page's inter-war sense of style is very much part of what makes Blakeney distinctive, which is a strong argument for preserving important examples of his work.

The new building has a significantly larger footprint than the existing dwelling (311 square meters vs 172 square meters; 238 square meters for the previously approved scheme). The applicants describe this as 'marginally bigger' than the approved scheme – it is in fact over 30% larger than the previously approved design, and over 80% larger than the footprint of the former Rectory. The L-shape, combined with the terrace (not apparently included in the footprint areas indicated) and the long east elevation, mean that the appearance of the proposed building will be even larger than the footprint suggests. From the east (Wiveton Road) side, the building is approximately three times the length of the existing property and will therefore be much more prominent, notwithstanding the lower height.

In addition, as mentioned above, the proposed new building utilises non-traditional building materials such as corten steel and large areas of plate glass. It includes a 'feature' gull-wing roof, that relates to absolutely nothing in the local area. Its only nod to local building practices is the use of a thin skin of uncoursed flint, used non-structurally to dress surfaces. This is almost the definition of 'pastiche'.

A number of other elements of the proposed design are causes for concern, including in particular:

- "Mirror panel" on the south elevation – again, not consistent with the appearance of Blakeney. Its use is not explained in the Design & Access Statement. The mirror panel is likely to reflect sunlight from the south. Analysis is required to prove that it would not cause glare that might be a danger to motorists driving towards Blakeney from Wiveton
- The "Knapped flint" panels on the east elevation are not structural and, unlike typical areas of flint in Blakeney, have no brick courses or supports. Rather than "echoing the flint walls" as the applicants suggest, this makes the appearance jarring when compared with nearby walls and buildings

The proposed building is designed not to fit in with its environment, but rather to make a strong, aggressive 'statement' within it. If erected on the application site (as opposed to a less prominent and sensitive position) the proposed new building would add nothing positive to Blakeney — on the contrary, it would constitute a jarring eyesore.

Additional concerns

There are a number of additional concerns, as follows

On ecological grounds:

- Although the applicants carried out a new protected species survey this summer, this only measured the number of protected species on site and the impact of demolishing the existing historic Rectory. It remains unclear what impact the addition of large areas of glass and steel - not present in traditional buildings, but very much a part of the proposed replacement structure - will have, for instance, on bats' ability to navigate safely.
- The surveys do not provide details on bird life that may be impacted by building works (including the loss of natural habitat to erect a much larger footprint house and the addition of a paved tennis court area). Within the last two years, bird species including buzzards, red kite, tawny owls and barn owls have been seen in or near the site.
- There is no analysis of the potential light pollution effects of having a large glazed area forming the core living space in the house.

On historical grounds:

- It is important to save the former Rectory, both because it is a well-preserved, purpose-built 1924 rectory still standing next to its late medieval predecessor rectory, and hence a relatively rare survival, but also in light of the contribution it continues to make to the village, the Blakeney and Glaven Valley conservation areas, and to nearby listed properties.

Conclusions

There are numerous grounds, as set out here, on which this proposal is utterly at odds with the development plan and NNDC's supplementary planning documents (Design Guide, and Blakeney Conservation Area Appraisal), which are material considerations for the decision maker in determining this application. Furthermore, the proposed development is also inconsistent with the Blakeney Neighbourhood Plan Aims and Visions, and has been opposed on policy grounds by Blakeney Parish Council. A further, and critical, material consideration is the recently revised National Planning Policy Framework. Unless an independent review of the heritage aspects of the case is undertaken in light of all of the evidence that has been made available to the Council, and in the context of section 16 of the NPPF, the Council will not have properly discharged its duties and any decision it makes may be challengeable.

The previous application to demolish the New Rectory was the subject of extensive objections from local residents and national conservation bodies including SAVE Britain's Heritage and the 20th Century Society.

In light of these factors, any decision other than a clear refusal of planning permission would call into question NNDC's position on the primacy of the development plan and its ability to properly weight and balance the numerous material considerations in this case.

Objection to Application PF/18/1263 – Comments on C&D evaluation of and local listing eligibility of New Rectory

In the course of the previous planning application for this site, the NNDC's Conservation Officer (the "CO") considered the report by Oliver Bradbury "An Architectural Appraisal of the Former Rectory, 8 Wiveton Road, Blakeney" (the "Architectural Report") and carried out an evaluation of the current building at 8 Wiveton Road (the "New Rectory") in relation to local listing criteria. These were included in the Conservation & Design Comment for the previous application. Quoted material from this document is shown in italics in this note.

I respond to the CO's evaluation here in order to demonstrate that the points made are matters of judgement and interpretation, and can and should be reconsidered in the course of evaluating this application, particularly as the response and evaluation were carried out very rapidly and apparently without detailed engagement with the evidence.

Response to the Architectural Report

The CO expresses the opinion that:

"There are two salient points emerging from the document entitled 'An Architectural Appraisal of the Former Rectory, 8 Wiveton Road, Blakeney' to which C&D address."

The CO identifies the first of these as 'the historic association'.

"There clearly is a narrative between the four ecclesiastical buildings located along Wiveton Road namely St Nicholas Church, The School, The Old Rectory and New Rectory – however this historic association does not carry any substantial weight in terms of the NPPF or of any overriding significance in relation to Local Plan Policies. The listed buildings of the Old Rectory, School and Church will not be harmed by the demolition or potential loss of the New Rectory - their significance will remain intact and unaltered. The historic association might potentially be diluted or indeed eroded by the loss of the New Rectory in its current form; however a building will remain on the same footprint and occupy the same site. This evidence also remains in documentary form as clearly shown within the submissions."

The CO asserts that *"this historic association does not carry any substantial weight in terms of NPPF or of any overriding significance in relation to local plan policies."*

The CO further asserts that *"the listed buildings of the Old Rectory, School and Church will not be harmed by the demolition or potential loss of the New Rectory - their significance will remain intact and unaltered."*

In my view this is simply not the case. If there is a group of buildings related closely by meaning (to spell it out: the church is the centre of the parish; the parish school is an offshoot of the church, historically intended to teach skills in literacy to allow participants to function meaningfully in parochial life; the

rectories, as well as sometimes themselves serving as school houses or other focal points of communal life, exist to house the rector and his or her family, in order to provide a shepherd for the parochial community; the tithe barn exists as a monument to the way in which parochial tithes, provided by the entire community up to the 1830s, sustained the rector and his work) then obviously, removing one of these buildings by definition removes a part of that meaning. Further, neither of the proposed replacement structures is remotely on the same footprint as the New Rectory - both are much larger, and hence more assertive within the logic of the original group of buildings.

While it is true that documentary evidence of the New Rectory remains in the Church of England archive, the same is true, for instance, for St Nicholas' church, which is perhaps even more firmly documented. Why, then, not demolish that to build a modernist house, 'on the same footprint', given that it is so well documented? Or Norwich Cathedral? Or any other well-documented historical building in Norfolk? In other words, the fact that a building is documented should not be an automatic argument in favour of its demolition.

The second point raised by the CO is this:

"Secondly, the named architects Holtom and Page. Clearly these are competent local architects, however they carry no national or even regional notoriety. The submission even alludes to the fact that little is known of their practice and records of their work are limited. The recent listing of the Blakeney War Memorial to which they are also credited, makes no reference to them as architects and certainly does not mention their involvement as a reason for designation. In this instance, the weight given to their association with the design of the 8 Wiveton Road has to be relatively low."

This seems to me an unusual point of view. Just because an historical discovery is not at present well known — or even 'notorious' — cannot mean it is without interest or value. Needless to say, I consider this to be a reactionary and rather limiting perspective, suggesting that only things that are well known to the general public have merit.

It is also worth adding that, until my wife and I provided information regarding the history of the New Rectory during the course of the previous planning application, the CO appeared to show no curiosity as to who had commissioned, designed or built the building; why it had been commissioned as it was; or its historical and cultural relationship with the buildings around it. Indeed, there was no heritage statement provided with the previous application to help NNDC make an informed decision. Again, this suggests a lack of engagement with the need to understand the New Rectory.

Elsewhere, we have gone to some effort to demonstrate the enormous impact that John Page in particular made on the present-day appearance of Blakeney. His inter-war buildings do much to define the scale, style and ambience of our village; the character and appearance of Blakeney specifically reflects the combination of inter-war buildings (many of which John Page designed and built) with the older "traditional" buildings. Given how many of Blakeney's buildings were either built or re-ordered by Page, the fact that Blakeney does not look like Morston, Cley or Wiveton is to a large extent the result of his work. It is unfortunate that these historical links and architectural significance were not reflected in the previous assessment of the New Rectory but it does not mean that they do not exist.

Local listing criteria

The CO goes on to address the criteria for local listing.

“In terms of the buildings status [sic], it should be clarified that 8 Wiveton Road is not a designated heritage asset, nor is it a non-designated heritage asset. Having carried out an initial assessment against the Councils adopted Local Listing Criteria, C&D have come to the conclusion that the building is not worthy of inclusion onto the North Norfolk Local List (see further details below).”

"1. Architectural Importance

(a) Good example of regional/local style and local distinctiveness.

With only hints of arts and crafts design the building is certainly not a good example regionally or even locally.

(b) Intrinsic design value relating to local characteristics.

Limited intrinsic design value portrayed, architecture modest and no longer intact.

(c) Good example of a specific style or function (e.g. purpose-built motor garage).

Not a good example of a particular style, nor of a specific function.”

The CO's examination of the building did not involve an inspection of its interior, despite the fact that the building is currently owned by the applicants who could presumably have provided access. He also did not record its two remaining original leaded windows and surrounding joinery.

Elsewhere the CO suggests that because a building is 'plain' or 'functional', as a result it lacks merit: something which suggests a complete misunderstanding of the history of architecture, not least modernism. I contend that, on its own, this issue raises serious questions about the reliability and robustness of NNDC's assessment of the building and the safety of any decisions based on it. As set out here, more than enough issues arise from the Conservation & Design Comment prepared in connection with the previous application to demonstrate that its conclusions ought to be regarded as unsafe and unsound.

The CO also points to (sic) *“Limited intrinsic design value portrayed, architecture modest and no longer intact.”*

This is incorrect. Not least, how is the architecture of this building more 'modest' than most of the flint cottages on Blakeney's High Street? It isn't. Put simply, there is a failure to address how the building

responds to those around it, why the references to the Queen Anne style employed here have historic resonances both in the 1920s and today (particularly in an ecclesiastical context), or what is special about the building that is distinctive and important for its own period (the integral garage, the boiler house, the intact internal service areas).

As for the suggestion that the building is 'no longer intact' this is simply untrue. By comparing the 2014 Arnold Keys' estate agents' plans with the 1924 drawings by the architect John Page, it can be demonstrated that the current building is almost entirely intact. To spell this out, the floor plan; internal fittings including doors, fire surrounds and hardware; the external finish; the external structure; the fine entrance hall; and indeed some of the exterior plantings are all as they were.

There are only two material changes. A porch has been introduced that could easily be removed. It does not affect the intact character of the building, as it is purely an addition that could be reversed if desired. Also, uPVC windows have been introduced, but particularly as two original windows survive, together with the architect's plans, no difficulty should be encountered in substituting new, replica windows that would adopt the original design.

"2. Contribution to Townscape (Group Value)

Buildings and structures which form part of an architecturally important group (termed group value) and having a cohesive design or historic relationship.

Limited physical relationship to neighbouring properties, only filtered views between the New and Old Rectory with only long distance glimpses of the New Rectory and Church. Historic relationship is present and covered in the criteria below. "

There is a clear historic relationship between the New Rectory and the nearby buildings – which although covered elsewhere is also explicitly relevant to these criteria. The listing for the school refers to group value; the question is whether the New Rectory is part of the relevant group. As the parochial rectory for more than ninety years, constructed in the grounds of the Old Rectory and with clear architectural correspondences to it, it has a strong historic relationship with the other buildings in the group. To put this as clearly as possible, the church, parish school, old schoolhouse, two rectories and the tithe barn are all a closely-knit part of the ecclesiastical history of Blakeney. It is unfortunate that whoever put together the listing for the parish school did not grasp this point, but that should in no way detract from its significance. Further, as the NPPF definition confirms, a heritage asset does not need to be formally recognised. Indeed, many aren't. The fact that the building is not designated or protected is not confirmation that its significance is less than any of the designated heritages assets in the village. Had the building been properly assessed rather than being the subject of a post-rationalised designation dismissal, the building's significance would have been properly recognised.

Contrary to the CO's statement, the New Rectory can be seen clearly from the Old Rectory for much of the year. At no point in connection with the original application did NNDC seek to establish sightlines

between the two properties either from inside the Old Rectory, or from more than a single, arbitrarily-selected point on the lawn of the Old Rectory.

"3. Historical Association

Any building/structure which has made a significant contribution to the Conservation Area's history (e.g. 1902 lifeboat station at The Gangway, Cromer) or by historical association with a famous national or local person (such as Henry Blogg, Winston Churchill). Where known, the renown of the architect/designer may also have bearing.

The building does have a historic association with other neighbouring listed buildings by virtue of its ecclesiastical links and as part of Blakeney's historic evolution, the architects also have local connections but are certainly not well known or renowned."

The New Rectory played a significant part in Blakeney's history from the time of its construction to 2014. As has been discussed in great detail above and elsewhere, the architect, John Page, is responsible for either building or re-ordering many buildings that make up the 'look and feel' of present-day Blakeney.

"4. Age

Normally no buildings constructed post-1947 will be considered for 'Local Listing' unless they display a particularly innovative and qualitative design. There will be a presumption in favour of designation of buildings constructed prior to 1948 provided that they are of a standard which complies with one or more of the other criteria."

He goes on to add:

"This is an interwar building dating back to 1925, whilst of age is not comparable to other locally listed buildings within the District and does not display innovative or qualitative design. Documentary evidence suggests the building was built to be functional and constructed on a budget."

One assumes what is being said here is that although the New Rectory is considerably older than 1947, it "does not display innovative or qualitative design. Documentary evidence suggests the building was built to be functional and constructed on a budget."

This is in my view a curious response. Buildings are in general built to fulfil a function and on a budget – that does not mean that they lack merit.

It is of course quite possible that the New Rectory was built within some degree of budgetary constraint but that of itself cannot detract from the merits of the building. Instead, it speaks eloquently of the social and historical relationship between the Old Rectory (regarded in 1924 as old-fashioned, excessively large and too expensive to run) versus its successor the New Rectory (designed to be

smaller, more streamlined, and more economical). If the suggestion is that buildings are only worthy of preservation if they were extremely costly to build, or if they were built with no eye either to cost or practicality, that strikes us as an unusual, if not a worrying, stance.

Whatever else this comment might be, it suggests a failure to appreciate architecture and its realities, both ancient and modern.

"5. Archaeological interest

This may be an appropriate reason for local designation provided that the evidence base is sufficiently compelling and a distinct area of interest can be identified.

No archaeological interest apparent."

The archaeological interest will be 'apparent' to someone with an interest in the history of Blakeney. The New Rectory lies exactly athwart the old Holgate Way, which from its name possibly dates back to the ninth century at least. Based on its close proximity both to the church, and the fact that it is located on one of the early manorial sites in the parish (the former Rectory manor), the New Rectory site may well be richly significant in archaeological terms.

"6. Rarity

The occurrence of a particular design or construction

Limited rarity value and not a good example of design or construction."

The New Rectory is an individual, architect-designed building.

The assertion of "limited rarity value" has been made without any evidence. It would be interesting to know how many mid-1920s, purpose-built rectories survive, located next to their 16th century (if not older) predecessors, complete with an intact floorplan, intact interior details such as fire surrounds and hardware, intact external structure and garden setting? It would also be interesting to know whether the CO has taken this into account in his assessment.

The answer, alas, is that precious few such buildings are still extant. The few that survive deserve to be preserved for future generations. It shouldn't be necessary to spell this out, but perhaps it is: although the New Rectory is only 94 years old, if it is demolished this year, it will never survive long enough to be as old, for instance, as the circa 500-year old Old Rectory is today.

"7. Landscape

Relating to the interest attached to historic or natural landscapes and/or the buildings or structures which are located within them, including designed parks and gardens and the grounds of key estates.

The building does not lie within a designated park and garden and carries limited landscape value. The roof of the property is visible from long range views but cannot be considered a prominent landscape feature."

The opinion that whilst "the roof of the property is visible from long range views", it cannot at the same time, "be considered a prominent landscape feature" lays itself open to an obvious challenge. A roofline visible from long distance is surely a prominent feature.

"8. Landmark

A building or structure with a strong communal or historical association or striking aesthetic value and which may be a key landmark in the local scene.

The building does hold a prominent position along Wiveton Road but this does not make it a landmark structure and its presence is not striking or of great aesthetic value due to modest design and poor condition."

Similarly, and echoing the point made above, the conclusion is reached that whilst the New Rectory 'does hold a prominent position', this somehow doesn't make it a landmark. Surely its very position does make it a landmark? Once again reference is made to the New Rectory's 'modest design and poor condition'. The 'poor condition', though, insofar as it is to any meaningful extent true, could be rectified. As for 'modest design' — this is subjective. Not everyone agrees that a striking or unusual structure is intrinsically better, or more of a landmark, than a more mellow, time-worn building, constructed with respect and deference for the older buildings around it, having won its place in the community's heart over nearly a century.

What makes for a landmark anyway? It could be size, form, bulk, mass, colour, design, detailing, setting and numerous other factors besides. The New Rectory is not small by any means, and presents its long elevation to Wiveton Road as one approaches Blakeney from the south east. Its distinctive form and long ridgeline perched between and above the boundary planting is without doubt a recognisable landmark, visible from across the Glaven Valley and as one enters Blakeney from Wiveton, and one which would be lost as a result of the proposed development.

"9. Social and Communal Value

A building or structure perceived as a strong source of local identity, social interaction and coherence, community history or tradition.

There is a community history and tradition to the site again by virtue of its historic and ecclesiastical association, however this has been eroded overtime and its presence currently offers no social or public value”

Many in the local community have, at some point or other, had a close personal relationship with the New Rectory. One such example is a local resident who described to us her memories of visiting the property with her husband to plan their wedding and then, many decades later, to plan her husband’s funeral. Both memories were intensely important to her. So was the spiritual and practical support she had been given during the course of that and other visits. This example serves to underline the importance of local 'history and tradition', and helps emphasise the social and community value of the New Rectory.

The value to a community of a building is surely better understood by that community itself than by an outside observer. The value to many in the Blakeney community of the New Rectory was reflected in the extent of opposition to the previous proposals. Neither that value, nor the history and tradition associated with it, was effectively considered in the conservation officer’s evaluation. Neither was the history of the New Rectory, or its relationship with the neighbouring Old Rectory and other ecclesiastical and community buildings nearby, properly taken into account.

For nearly a century, the New Rectory was considerably more than just a private house. As the office, as well as the home, of the rector of a large combined benefice, it was a centre for the community’s social and spiritual life. Many local people retain memories of their experiences there: Easter egg hunts in the grounds, preparation for liminal moments in their lives, the calm centre of a vibrant and sometimes contentious coastal community. The New Rectory was there when the village was full of servicemen on active duty, when bombs fell on Langham, when the future seemed particularly uncertain and contingent. For the generation who are alive now, that roofline is what they expect when they travel up from Holt or Wiveton — the tall chimneys, the gently-mellowed roof tiles, the trees around them. Those more closely involved with the parish remember PCC meetings in sunny rooms with a beautiful view over the Glaven valley, fellowship and strong sense of inclusion.

The availability of what in my opinion amounts to no more than a desktop critique unsupported by any research or assessment of its own ought to give cause for significant concern. What weight can be attached to such a critique? Without the necessary research and assessment, including taking due account of the community’s views about the building, its conclusions can only be a matter of personal opinion and subjective judgement. This is not a suitable basis on which to make a decision about the permanent loss of a heritage asset.

It has to be right that proper regard is paid to and weight place upon all of the above when assessing the importance of the New Rectory and the merits of its retention.

Conclusions

The local listing criteria referred to above carry a presumption that pre-1948 buildings will qualify for local listing if they fulfil one or more of the other criteria.

In my view, and contrary to the assessment by the CO, the New Rectory fulfils several of the criteria:

- 1. Architectural Importance – a fine and increasingly rare example of an inter-war rectory, largely intact, with numerous features typical of its period (notably the integral garage, boiler room and service areas).
- 2. Contribution to Townscape (Group Value) – by merit of its close association with the other nearby parish buildings including St Nicholas Blakeney (Grade I), the Old Rectory (Grade II*), the tithe barn (Grade II), parish school and former schoolhouse (also both Grade II).
- 3. Historical Association – by merit of its role in the 20th century history of Blakeney.
- 6. Rarity — it is relatively unusual for an Old Rectory of circa 1518 to exist next to its replacement New Rectory of 1924, both of them still relatively intact, in the context of a group of other related ecclesiastical buildings.
- 8. Landmark – given the combination of strong communal association and location on the gateway to Blakeney, highly visible from Wiveton and the south.
- 9. Social and communal value – the building was in active use as a Rectory between 1924 and 2014, and is well remembered as such by numerous Blakeney residents. The connections with the other nearby (and listed) ecclesiastical buildings, and what is currently a remarkably intact group of buildings that tell the story of parish life in Blakeney, would be eroded by the demolition of this building and its replacement with a new, modernist, purely private residential structure.

In my view there is a strong case for local listing. In any event, the comments the CO analysed here greatly understate the historical and architectural relevance of the New Rectory in the context of Blakeney — its history, its heritage and its 'look and feel'. This relevance should now be independently reassessed, preferably by someone with no previous experience of this case, in the consideration of the present application.

██████████

████████████████████

Dear Sirs,

Application PF/18/1263 - Heritage Impact Assessment

In our view, the Heritage Impact Assessment (“HIA”) submitted on 20 July 2018, with reference to the demolition of the former Blakeney Rectory (8 Wiveton Road, Blakeney NR25 7NJ) and the construction of a replacement structure (NNDC PF/18/1263) contains inaccuracies and incorrect interpretations and should not be considered to be an objective basis for NNDC’s consideration of the application. We set out our reasons for this below.

Heritage Asset and local listing definitions

The HIA identifies the Old Rectory, Blakeney Conservation Area and Glaven Valley Conservation Area as heritage assets within the setting of the development site. The HIA claims (3.2.2) that no Conservation Area Appraisal of the Blakeney Conservation Area is available (as of 20 July 2018). An advanced draft of a new Conservation Area Appraisal is, however, now available (as of 14 August 2018) on the NNDC website. This should be addressed in the HIA.

It is true that the former Blakeney Rectory itself has not, hitherto, been classed as a Designated Heritage Asset (c.f. 4.1.7 and *passim*).

At present (August 2018), however, and as noted above, NNDC is in the midst of undertaking a review of the Blakeney Conservation Area. This review involves the production of a Conservation Area Appraisal and Management Plan setting out proposals to help protect the area's special character and qualities, and includes a process of public consultation. This surely implies that the scope, composition and qualities of the Blakeney Conservation Area are not immutably fixed, but rather are open to interpretation and re-interpretation, change and development over time.

Furthermore, although Heritage Assets include Designated Heritage Assets and assets 'identified by the local planning authority', this definition is not in any sense exclusive – other buildings and sites can constitute heritage assets even if not Designated or locally listed¹.

The fact that the former Rectory is not presently classed as a Designated or locally listed Heritage Asset means only that its significance has not been recognised by any formal designation — not that it is not significant in its own right or for planning decision making purposes.

¹ Annex 2 of the National Planning Policy Framework defines a 'Heritage Asset' as: “A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).”

Since the applicants made their earlier planning application (ref: PF/16/1417), important new information has come to light regarding the history and architectural significance of the former Blakeney Rectory. Although it has long been known — at least to anyone who made any effort to investigate the matter — that the former Rectory was commissioned by the Rev. David Lee Elliot circa 1924 as a replacement for what is now the Old Rectory, and that it served that function for 92 years until it was sold by the Church of England in 2016, it was only in late 2016, when architectural historian Oliver Bradbury conducted archival research relating to the former Rectory's history, that the architect of the building was identified securely. Bradbury's report is attached.

Bradbury was able to establish that the former Rectory was designed by the local architectural practice of Holtom & Page, based in Holt, and specifically by a Blakeney-born architect named John Page (1885-1973). The involvement of Page is significant. In the course of a long design career, Page left a distinctive mark on his native village. In addition to creating the former Rectory, Page designed the Blakeney War Memorial, the iconic Pye's Garage (1919) and several other houses in the Morston Road, converted various disused buildings along the Quay and created Old Garden Cottage, modified Priory House, built White Friars and the house on Kettle Hill, as well as several houses in Coronation Lane, Mansard Cottage in Little Lane with its distinctive and prominent roof, several houses on the Langham Road and Highfield House in Wiveton Road. In addition, Bradbury thinks it likely (and we agree) that Page designed Memorial Cottages, and carried out a programme of work at the Old Rectory itself, including the creation of the first-storey room spanning the entrance to the old stable yard, in which the roof detail, roughcast render and leaded windows all resemble Page's work at the former Rectory. Most of these projects were carried out during the inter-war years. And happily, much of Page's work in Blakeney survives today.

What is distinctive about Blakeney? There are, after all, many villages along the North Norfolk coast that include charming, modestly-sized cottages executed mostly in uncoursed flint, sometimes rendered and sometimes with the render long since stripped from them, and with pantiled roofs. Blakeney's distinctiveness, in contrast, derives in large part from the way in which it responded, during the inter-war years, to the circumstances that transformed a struggling coastal port into a thriving destination for automobile-based tourism and year-round leisure pursuits. Much of what we see in Blakeney today, many of its most iconic buildings and views, relate not to some notional timeless fishing village, but specifically to inter-war development — including the conversion of old barns and fishermen's cottages, which began during this period, but also high-profile buildings such as Blakeney's former Rectory.

Page's work was central to these developments. His sense of scale, fondness for amusing detail (including interesting rooflines) and his up-to-date practicality (the

integral garages, boiler rooms etc) did much to shape 'the look and feel' of the village. Page is, in large part, why Blakeney doesn't look exactly like Morston or Langham or Wiveton, or indeed anywhere else in Norfolk. And now that his role in designing Blakeney's former Rectory is understood, the significance of this early work by Page becomes even more obvious. To demolish this building would be to destroy — pointlessly — a building of architectural and historical importance to the local community, in order to replace it with something that both looks out of place here, and also lacks any genuine, organic bond with the locality. It would be, in short, an egregious mistake.

Now that the building can be seen in the context of Page's wider contribution to Blakeney, with a Conservation Area Appraisal for Blakeney in advanced preparation, and with village residents expressing, in the Neighbourhood Plan, the desire to preserve the "look and feel of the village", however, it would be appropriate for NNDC to review the former Rectory's status, and to protect it, with a view to gentle restoration rather than demolition.

Setting of the Old Rectory

The HIA is incorrect to claim that 'in visual terms the New Rectory has always been separate from the Old Rectory. The New Rectory was not designed to have a visual and / or physical relationship with these buildings'.

- This is quite an astounding inversion of the facts. The former Rectory was commissioned by the first private owner of the Old Rectory, who — as Bradbury's report makes clear — took a strong interest in architecture, had commissioned work before, and indeed had also quite possibly employed Page to work at the Old Rectory. And to anyone who bothers to look, the correspondences between the Old and New Rectories are obvious. The roughcast render, leaded windows, tall brick chimneys, the otherwise pointlessly high pitch of the roof, even the orientation of the building, half-turned towards its predecessor — all these speak of a powerful desire to echo and reflect the look of the older rectory. Before the Church of England changed the windows at the former Rectory, and before the Old Rectory was limewashed, the similarities would have been even more glaringly apparent. As it is, though, the two are still manifestly sister buildings, linked both by their history and their architectural detail.
- The plot on which the former Rectory sits was carved out of the gardens of the Old Rectory circa 1924, the point at which the Church of England decided that the Old Rectory was too large and expensive to be maintained as a parsonage. All of this land was part of the 'Rectory manor', once part of the Calthorpe estate but arguably visible in documents as far back as the Domesday Book (1086) as the land dedicated to the support of the parish church. The continuity of purpose between the older and newer parsonages should also be obvious, but apparently is not, at least to those with no interest in history or tradition.
- The previous owners of the Old Rectory and the Church maintained a

close connection between the properties, to the extent of there being no fence or other physical boundary between the properties until the Church of England put the New Rectory up for sale in 2014. Up to that point, the various owners (the Rev. David Lee-Elliott, Mrs Frida Brackley, her son David Brackley, and we as the present owners) had allowed no fencing or formal hedging between the two properties, in order to maintain that historic link.

- For a large part of the year — which is to say, whenever deciduous trees are not in full leaf — there are clear sight lines from most of the principal reception rooms and principal bedrooms of the Old Rectory to the former Rectory. As far as we are aware, in the course of the previous consultation, NNDC never investigated whether the former Rectory was visible from within the Old Rectory itself, including first floor rooms — only from an arbitrarily-chosen point on the lawn.
- The former Rectory is also very clearly visible from many points along the Old Rectory's main, south-facing lawn. As this lawn is often used by us as another 'room' — for dining, entertaining and relaxation — the fact that the former Rectory is so very visible is of great significance to us, as it no doubt was to previous owners, and as views to its site are likely to have been to the man who commissioned it.

Condition of property / 'fuel poverty'

5.3 "It is also worth noting that the internal layout no longer reflects the needs of current living styles and requires upgrading to current energy standards. The submitted Design and Access Statement (Hudson Architects July 2018) states that the Full Blakeney Parish Council Meeting (6th May 2014) recorded that the property was not fit for occupation due to fuel poverty and was in a poor state of repair."

This is not correct.

The internal layout of the former Rectory is, happily, virtually unchanged since the building was designed in 1924, as can be established by comparing the estate agents' particulars of 2014 with John Page's original plans. This underscores the extent to which it is a rare, hence important, survival. But at the same time, there is literally no reason why the existing layout should be deemed to 'no longer [reflect] the needs of current living styles'.

The existing layout is a perfectly normal layout, with normal rooms deployed in a very mainstream relation to one another. The rooms are neither abnormally small or in any sense inconvenient. At worst, minor alterations could be made to re-purpose some of the rooms. It would be entirely possible, for instance, for a competent architect to carry out a light-touch renovation, in which, if desired, one of the smaller upstairs bedrooms would be converted into an additional bathroom / WC. The kitchen could be linked with the south-facing reception room in order to create a larger space. The idea that the only response to a traditional building

layout is demolition makes no sense at all. On that basis, most buildings in Blakeney would require demolition, which they patently do not.

Similarly, at 5.2, the HIA asserts, citing the 'detailed evidence of the Conservation Officer', that the former Rectory lacks merit because it was built to be 'functional', and also 'constructed on a budget'. As many architects and indeed planners may realise, it is by no means unusual for buildings to be constructed on a budget (even the columns of the Marble Hall at Holkham Hall are made of alabaster rather than marble) or indeed with reference to a specific function. Many, perhaps even most, buildings are designed and built with some attention to cost constraints and to functionality. Again, this is not a very sensible line of argument, and the applicants would do well to abandon it. Further, we have not seen anything from the Conservation Officer which amounts to 'detailed evidence'. The Officer's comments on the previous application amounted to one document of just over one A4 side and another of just over two A4 sides (of which a significant part was reproduced listing criteria). The comments are almost entirely opinion and judgement, not evidence. This is in stark contrast to the considerable body of research, evidence and associated assessment provided in Oliver Bradbury's 2016 report.

The Heritage Impact Assessment asserts at various points, including 5.3, that in 2014 the building was in 'a poor state of repair'. Yet when Arnold Keys marketed the property in 2014, they described it as 'a fantastic opportunity, with additional scope for further updating and refurbishment'. The photographs included with Arnold Keys' marketing materials show a building that is bright, attractive and clearly occupied by a family — in this case, the family of the incumbent rector, the Rev. Libby Dady, who lived there until at least late 2014. Insofar as conclusions can be drawn from these materials, they show a property that is not decrepit or derelict to any meaningful extent whatsoever.

Finally, the Heritage Impact Assessment raises, oddly, the issue of 'fuel poverty'. Again, most competent architects understand the concept of retro-fitting historic properties in order to provide improved, up-to-date standards of energy efficiency. There is no reason why the former Rectory could not, with modest investment, be improved in this way. Specifically, the introduction of high-quality insulation, trickle-venting, better windows and a thoroughly up-to-date heating system — possibly even one incorporating ground source heat pumps, for which the site seems very suitable — would remove any 'fuel poverty' issues. One could go further, indeed, and argue that the existing building already entails a considerable amount of embodied energy, and hence that demolishing it would be, in that sense, a profligate waste of energy. The idea that the only solution for relatively energy-inefficient historic buildings is demolition is not a sensible one.

Further, though, even the applicants' reference to 'fuel poverty' is incorrect. The Minutes of Blakeney Parish Council's meeting of 6 May 2014 state:

'Michael Marshall (Diocesan Surveyor) explained that due to the real problem surrounding fuel poverty, the diocese are looking at properties across their area. Hence he outlined the proposals to build a new smaller Rectory in the grounds of the current six bedroom Rectory which is in a poor condition and of the desire to sell the current Rectory to the Parish Council and or local Housing Provider who in turn could look to turn the property into affordable housing for local people'

Contrary to the applicants' statement, the reference to fuel property is in relation to diocesan properties in general (by implication in the context of modest clerical salaries and the costs of maintaining large properties), a more general point regarding the Church of England and its review of multiple properties across the diocese of Norwich. And although the agent of the Diocese in question refers to the former Rectory as 'in poor condition', it is very clear in context that his aim is not to demolish it, but rather, to convert the existing building into affordable accommodation for the local community. He at no point states that it is not fit for occupation, not least as at the time he was speaking, the incumbent rector was living there with her family.

Alleged justifications for demolition

At various points (4.2.1-3, also 5.1), the applicants make negative assertions regarding the aesthetic qualities of the former rectory. E.g. at 5.1:

The house has extremely plain aesthetics and the original design has been eroded by the introductions of uPVC windows and an inappropriate porch. The roof is now discoloured and the render appears patchy and unsightly due to numerous unskilled repairs.

This is, needless to say, a subjective view. Not every architectural critic would wish to claim that 'plain' is, perforce, a negative quality. In this context, it seems more likely that the assertion was made by someone with limited appreciation for inter-war British architecture, its language and its nuances.

As comparison between the existing building and John Page's architectural drawings of 1924 makes very clear, in fact the former Rectory is remarkably well preserved. It would be easy enough to remove the inserted porch, and also easy to provide accurate replica windows, based on the original plans. (Two original leaded windows are still extant, although we note that neither the Conservation Officer nor indeed the applicants seem to acknowledge this).

The 'discoloured' render is no more 'discoloured' than that of other buildings in Blakeney, but could easily be limewashed if desired. The discoloration of the roof is easily reversible. Not everyone considers roughcast render intrinsically unattractive; indeed, in the middle years of the 20th century, it was generally regarded as far more attractive than e.g. uncoursed, exposed flints, and there are several prominent examples of roughcast render on Blakeney High Street, as well as at the Grade II* Old Rectory itself. The idea that any of these points mean

that the building makes a 'negative contribution' simply shows a lack of appreciation for the architecture of the mid 1920s, and a lack of ambition and / or expertise when it comes to the possibilities for a gentle, well-informed programme of renovation; or, worse still, an attempt to retrospectively justify an ill-conceived predetermined goal.

In the course of North Norfolk Planning Watch's judicial review of NNDC's decision regarding the applicants' previous proposal, it was shown that 'detailed analysis by the Conservation Officer' (5.2) constituted, in fact, at most 60 minutes spent on site over the course of three visits, with not even the most cursory attempt to gain access to the building, despite the fact that estate agents' advertisements show intact fixtures and fittings from the original 1924 construction, an intact floor-plan, charming details such as 1920s fire surrounds and an impressive entrance stairway, etc, etc. The Conservation Officer admits to having taken no notes during the course of these visits. The Conservation Officer made serious mistakes in his original 2016 submission, including suggesting that the roughcast render was some sort of later addition, rather than original, and indeed a response to the Old Rectory nearby, which of course also employs roughcast render, tall chimneys and steeply-pitched roof. He failed to note the survival of two original windows and accompanying surrounds. Relying on his account as definitive is, therefore, unsafe, although the applicants appear to do precisely this e.g. at 8.2 of their Heritage Impact Assessment.

The Heritage Impact Assessment further asserts that the former Rectory lacks 'rarity value'. Perhaps the applicants would like to establish how many largely intact, 1920s purpose-built rectories still survive, sitting next to their 16th century (or earlier) predecessors, rather than as replacements, so that both can be appreciated in each other's context? The former Rectory is, in fact, a significant survival for precisely this reason. With its up-to-date features (e.g. integral garage) but smaller number of bedrooms and staff rooms, it speaks eloquently to what the Church of England felt a rector might need, and be able to afford, in the inter-war period - exactly the time at which Blakeney acquired its present identity as a centre for automobile-based tourism and leisure pursuits. More broadly, as mentioned above, inter-war architecture is much of what makes Blakeney architecturally distinctive — including the growing appreciation for what were previously regarded as run-down and unattractive cottages on the High Street. Failing to see the place occupied by the former Rectory in this developing landscape is simply a lack of appreciation of our area's architectural history as a whole.

'There is a community history and tradition to the site' [sic], according to the Heritage Impact Assessment — which then goes on to assert, strangely, that the former Rectory 'currently offers no social or public value'.

In fact, quite a few of the submissions made in relation to the previous planning application said precisely the opposite of this. The fact that the applicants do not

value the history, tradition or cultural significance of this building, does not mean that the broader community does not value it. For many in Blakeney and the Glaven Valley more generally, the former Rectory was part of their lives, their normal lived experiences, for many years if not decades. It is part of the Blakeney they know and love. Although they understand the economic arguments that led the Church of England to abandon it, still, for them it holds memories and significance. Many people in Blakeney see the village in which they grew up changing into something very different — less historically rooted, less resonant, less distinctive. For at least some of them, the former Rectory is part of their own history. They do not wish to see it demolished and replaced with a Modernist residential structure that positively insists on its lack of relation, historic or aesthetic, to anything around it. They wish to see things left broadly as they are.

Finally, nowhere in the Heritage Impact Assessment do the applicants address the point that, in the course of their previous planning application, two very well-respected national heritage bodies, SAVE Britain's Heritage and the 20th Century Society, both made submissions to NNDC expressing their strong support for retaining the former Rectory. The Rectory Society, another long-established national organisation, also called for the former Rectory to be saved.

Again, this would seem to suggest not that the existing building lacks merit but, rather, that acknowledged experts feel that its merit has not been properly recognised by all involved in this process.

Proposed replacement structure

There is nothing 'outstanding' (5.5) about the proposed replacement building. It certainly does not display innovative design, or any attention to local building practices. A thin skin of flint applied to a few walls of a Modernist bungalow could easily become a thin skin of timber cladding were the building to be constructed in Kent — or indeed even roughcast render, were the same building to be erected in an east coast Scottish fishing village. It is hard to know what is 'sympathetic and local' (6.3) about either corten steel or large areas of sheet glass. Neither has anything to do either with local building traditions, or with any of the various buildings nearby, several of them listed. The extremely large windows, furthermore, run the risk of inflicting significant light pollution on the surrounding area. The corten steel, needless to say, does not even make reference to anything local, as oxidised steel really doesn't look much like traditional Norfolk pantiles, whatever the Heritage Impact Assessment might claim.

The Heritage Impact Assessment claims that the proposed structure will make a 'harmonious' contribution to the character and appearance of the area. But with what, exactly, is it even potentially in harmony? The only vaguely similar building in Blakeney is the recently-built Bliss, located to the south of the Morston Road

— a very long way, visually and historically, from the 'ecclesiastical quarter' centred on St Nicholas Church, the parish school and its old schoolhouse, the Old Rectory with its separately-listed tithe barn, and of course the former Rectory itself. It is, frankly, hard to see how anything could have been designed to be less harmonious.

Proximity to other buildings matters. The idea, asserted frequently in the Heritage Impact Assessment, that the proposed replacement structure will be invisible from the Old Rectory is simply not true. A visit to the site in mid-winter, when the leaves are not on the deciduous trees (mostly beech, with some additional elm, sycamore and elder), will confirm that the former Rectory site is clearly visible both from the Old Rectory itself, from the Old Rectory's main drive and from the south-facing lawn — as well as from the beech wood, which we use frequently for walks and reflection.

The applicants propose to add additional hedging by way of screening, but if NNDC wish to take account of traditional walls and boundaries, they should note that for the former Rectory's near-century-long history, there was never a firm barrier of any sort between the two properties, explicitly because successive owners — the Rev. David Lee Elliott, Mrs Frida Brackley, her son David Brackley and finally we as the present owners — wished to retain the important historical link between the two properties. In that sense, the insertion of a hard boundary between the two would be yet another exercise in trying to erase Blakeney's living history. But it is also striking that at 7.1 the Heritage Impact Assessment refers to the new screening as 'necessary', as if by way of admission that in fact the two properties are clearly visible from each other.

Conclusion

The Heritage Impact Assessment, as submitted, contains a considerable number of confident assertions. Many of these are at best subjective, at worst ill-informed or inaccurate.

We understand why the applicants might wish to build a strikingly different, assertively Modernist house, and also why they might want to do so in Blakeney. What we cannot understand, however, is why they cannot build such a house in a location where achieving their vision will not mean irreparable damage and loss to the built heritage and the mellow, time-worn, in large part inter-war ambience of the village.

We hope that NNDC's planning committee will take account of new discoveries regarding the centrality of architect John Page and his work to Blakeney's present-day appearance. We hope that NNDC will listen to the expert opinions of SAVE Britain's Heritage and the 20th Century Society, rather than the assertions of the applicants and their architect. We hope that the NNDC will realise that they are being given the chance to listen to the people of Blakeney, who in embarking on the preparation of their 'Neighbourhood Plan' stated clearly that preserving the

'look and feel' of the village matters greatly to them — a priority reflected in the decision of Blakeney Parish Council to object to the present application.

We hope that NNDC will reject the application to demolish Blakeney's former rectory and erect a Modernist structure in its place, in the expectation that a programme of light-touch renovation will return it to full use as a family home, suitable for present-day use yet still speaking eloquently of its history and heritage.

We will comment separately on other aspects of the application.

Yours,

[Redacted signature]

[Redacted contact information]

**AN ARCHITECTURAL APPRAISAL OF THE FORMER RECTORY, NO. 8
WIVETON ROAD, BLAKENEY, NORFOLK, NR25 7NJ**



Author: Oliver Bradbury, M.Litt., Independent Architectural Historian

Section 1 – Introduction

Section 2 – Author biography

Section 3 – Architectural features and group value

Section 4 – History of the building

Section 5 – Conclusion

Section 1 – Introduction

This appraisal is an independent assessment of the architectural and historic significance of the building in question, the former Rectory at No. 8 Wiveton Road, Blakeney, Norfolk. This edifice is currently under threat of demolition. The building is of architectural interest for being an interwar rectory and of group value for belonging to a historically and socially-interrelated group of four related buildings: the church of St Nicholas, the old schoolhouse and Blakeney Primary School, and the original rectory, now a private house.

The interwar rectory was built in 1925 and appears to be well-preserved, except for the windows, which are modern replacements. It sits in a conspicuous position, clearly visible on from incoming Wiveton Road into Blakeney, but because it is in a late Art and Crafts idiom, it is architecturally reticent and being 92-years-old, is bedded-down in a way that is completely harmonious with the mature wooded surroundings.

The original design for the house, but not detailed working drawings, fortunately survives. The recent discovery of these plans at the Church of England Record Centre, London, now allows us a much fuller understanding of the New Rectory's architectural significance, for the architects – Messrs. Holtom and Page - have now been identified and the building can be placed in the context of their other local and national work. It is necessary to place this building in a national/chronological context and therefore it is instructive to consult Anthony Jennings' *The Old Rectory: The Story of the English Parsonage* (2009), for Blakeney rectory very much equates with the following account:

"From the First World War to 1939

"The story of the late nineteenth century had been one of increasing diocesan control and this would only intensify. The Archbishops' Committee on Church Finance in 1911 said there was too much parochialism and recommended that the diocese should be the main unit of the Church, and diocesan boards should be set up for finance and church buildings. Next, the First World War brought fundamental changes to the British way of life. One factor was purely economic – the value of money. Inflation in Victorian times had often been static or non-existent. Prices actually fell for considerable periods. Endowments had been stable. The war brought high inflation, badly eroding fixed incomes. Landowners were in recession during the two post-war decades. Parishioners were in reduced circumstances. Worse, the war had irrevocably altered attitudes to faith. There was a loss of community feeling, and the start of a long period of decline in respect for the Church as a mainstay of the community.

"All this affected attitudes to Church buildings. The large traditional parsonage was beginning to be seen as a problem. Only shortly after the new, still large Edwardian parsonages, the 'great sell-off' of the twentieth century was beginning.

"The Church Assembly was set up, and started to meet in 1920. In 1923 the Diocesan Dilapidations Boards were set up and the quinquennial parsonage inspections became

compulsory, and money deducted from the incumbent's income was put in a fund for benefice repairs. The Bounty and the Commissioners continued to provide substantial funds in an attempt to remedy the backlog of dilapidations. They developed firmer guidelines about the cost of parsonages, size of rooms, ceiling heights, and so on. The Church Assembly held lengthy discussions about 'unsuitable houses'. The argument for the transfer of ownership of the parsonage to the diocese can be traced back to this legislation, and it came up again in the 1930s, but the clergy freehold prevailed.

"In 1925 a substantial minority of houses was considered too large and by 1930 nearly 600 had already been sold, even though there was a depression and large houses were difficult to sell, but even so another 700 went before 1939. By 1938 the population was about 40 million, a massive fourfold increase since 1811. Though the Church was not growing in the same way, more houses were needed (as there were now about 20,000 clergy) and about 600 replacements were built and 500 or more purchased. These pre-war houses were a lot smaller than many older ones but were still of about 2,500 square feet (nowadays redefined as 'overlarge'). Objectively, the size of these houses could surely be justified by the facilities for the community they could provide, but on the Church's own criteria it seems these houses were another mistake, giving rise to more future cost in disposal and replacement."¹

Designed only five years after World War One, Blakeney New Rectory can therefore be seen as an architectural and historic response to the post-War climate, resulting in a 'budget' rectory. Built from a loan from Queen Anne's Bounty scheme, 'the house proposed is not a large one' (1924) and the result of considerable budget 'cheese paring' (as in 'They developed firmer guidelines about the cost of parsonages, size of rooms, ceiling heights, and so on') by the Bounty Governors, and yet the result is quite a large house by today's standards with six bedrooms. Moreover, somehow a low budget could still yield an elegant design through simplicity of form and ordinary materials.

In the appraisal's view (particularly in light of the importance of the New Rectory to the setting of the Old Rectory and the Church, and the importance of the New Rectory to a full understanding of the history of the Old Rectory), the desirable outcome for No. 8 Wiveton Road would be a sensitive renovation and modernisation of the New Rectory, a pleasant late Arts & Crafts building already relating most harmoniously to its mature surroundings, which would be entirely possible, rather than its demolition.

¹ (Continuum, London & New York), pp. 36-37.

Section 2:

Author biography:

My qualification is a research masters from Bristol University: Master of Letters (M.Litt.), 2001-2003. I have published three books since 2004 and over 80 articles and papers since 1995. On 6-7 May 2011 I presented the opening paper given at 'Re-appraising the Neo-Georgian 1880-1970', Neo-Georgian Conference at the Paul Mellon Centre for Studies in British Art, London. See credit in *Neo-Georgian Architecture 1880-1970: a reappraisal* (Historic England, Swindon, May 2016), p. ix.

I have worked as a consultant for Conservation Architecture & Planning, Headley, Hampshire, and in 2003 I undertook the historical research for an appraisal towards the formation of a new Conservation Area within Hastings, Sussex. In 2004 I assisted with preparatory surveying of potential Architectural Conservation Areas for Galway County Council, Ireland, on six towns (Athenry, Clifden, Gort, Loughrea, Portumna and Tuam).

In 2006-2007 I was the historian for Conservation Architecture & Planning's 'Welwyn Hatfield Borough Council, Welwyn Garden City, Conservation Area Appraisal', September 2007. From 2006-2008 I was the Assistant Architectural Adviser to Hampstead Garden Suburb Trust, London, where I advised residents on what they can and can't do to their homes on the Suburb; processed planning applications and presented proposals to the Trust Council's Property and Plans Committee. In 2011 I researched and wrote a Statement of Significance (towards an HLF funding application) concerning the former Museum of Mankind building and now part of Royal Academy estate, London.

From 2010-2017 (current occupation) I have been the historic building researcher for Julian Harrap Architects LLP, London; and from October 2015 as a part-time Associate. Harrap is an architectural conservation practice and my work for this firm is detailed research that will inform the restoration and design process. Since 2011 have also written reports for Stiff + Trevillion, architects, London, and other clients before (2000-) and after this date.

Section 3: Architectural features and group value:

Notable features and architectural idiom:



The former rectory comprises a main block five bays wide and two storeys tall, dominated by a tall and steep hipped tiled roof, with two tall brick chimney stacks. The roof in particular reflects an Arts and Crafts ancestry as does perhaps the asymmetrical plan, which has a rear projection and the roof separately hipped here to accommodate this. An Arts and Crafts plan and a staggered layout is particularly apparent in the photograph at the start of this appraisal. Here it can be seen that the roof is emphatically used as an architectural element in itself, as are the four chimney stacks throughout the building.

An architectural composition like this would be worthy of Hampstead Garden Suburb, London, especially if the rectory's original leaded light casement windows were put back. On the front elevation the windows are all of the same size except for a large window above the entrance and positioned to light the stair within. The building then steps down as a composition (again, typically Arts and Crafts) to a side wing of two bays at the front and three at the side; an engaging feature is the three windows within the gable; an element not repeated on any of the other elevations; thus contributing to the studied asymmetry of the overall composition.



An Arts and Crafts touch with the side wing elevation is the wrapping round of the pitched roof eaves, acting as bookends to the three windows in the middle and at first floor level. The composition then steps down again, and finally, to the utility area comprising garage, shed, yard, fuel store and W.C. There is or was a heating chamber basement under the kitchen. Although

utilitarian, this area is attractively presented and pivoted around a self-enclosed yard. The treatment of the roof eaves is different in this zone of the building, with the rafter ends exposed.



The interrelationship of roof planes can be clearly seen in the above photograph, as can the importance of the chimney stacks to the composition.





As considered as the gabled east end composition, is the singular west end elevation (see above photograph); a powerful composition in architectural reductionism. As with all the elevations, it can be directly compared to the 1924 architectural drawings reproduced later in the appraisal. In complete contrast to how the Georgians would have hidden the building's heating system, here the chimney flue and stack is made the main feature of this end elevation, artfully orbited by four casement and leaded light windows, originally. An Arts and Crafts mannerism here is the treatment of the top of the projecting flue, which has a shallow tiled roof skirting and then an exposed brick section between skirting and the eaves; this section providing a worked hub of detail in contrast to the plain pebble dash walls dominating the composition. There is really nothing in this building that can be claimed to be indigenous to Norfolk; pebble dash is national and is found in Arts and Crafts architecture elsewhere, such as No. 5 Meadway, Hampstead Garden Suburb, London: 'Houses. c.1909-10. Unpainted pebbledash with timber framing; dressings in tile flats and brick.'



The rear composition, facing the fields beyond, is much plainer than the front and side elevations.

Interior:



The interior has not been inspected the but the original oak stair survives. This is carefully detailed with notched newel posts and moulded balusters, with the largest window of the building bringing in light to this area. The original simple tri-fielded landing doors with plain architraves clearly survive too.



The Living Room has a noteworthy Arts and Crafts brick chimneypiece with central arch and keystone. Although this building was done on a budget, effort was made with features such as what would be the most important chimneypiece of the building. The two ceiling beams above,

although structural, help to break up the plainness of the room. The room evidently captures the south light.



This ground floor kitchen, although plain, relies on very simple features such as the chimneypiece timber mantel shelf on paired consoles in order to draw the eye to the centre of the room.



This upstairs bedroom (one of six), presumably the one in the south-west corner, has a simple brick Arts and Crafts chimneypiece in the corner (the angling is characteristically Arts and Crafts, as opposed to a straight-on chimneypiece), with an original cupboard immediately next to it.

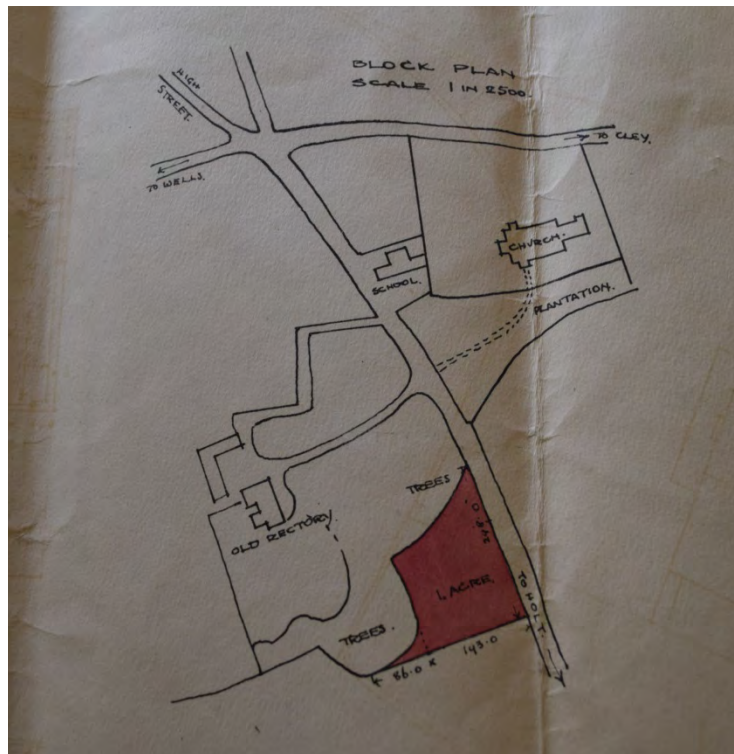
Although an Arts and Crafts design redolent of vernacular traditions, the rectory was one that incorporated an interconnected side garage, reflecting 20th century needs. The building design is plain but with enough detail to keep our attention; the exaggerated roof profile reflects the earlier Garden Suburb afterlife in the design and for being the type of roof so easily found at Hampstead. Sparring detail is confined to the timber front door and timber overthrow, emphatic brick chimneys, and originally the casement and leaded light windows before their removal. Such devices illustrate the earlier Garden Suburb ancestry of Hampstead and Letchworth; as does the steep hipped garage roof design. Another quirk or engaging detail is the use of little windows to break up flat surface, such as those on the west end, flanking the chimney flue.



Whilst every effort has been made to ensure the accuracy of the floor plan contained herein, the architect does not accept any responsibility for any error, omission or misstatement.

The recent floor plans above show that the original floor layouts (see 1924 plans below) were more or less carried out precisely to plan.

Group value:



The above August 1924 plan by architects Holtom and Page shows that the one acre plot that would be the site of the new rectory, although screened by trees acting as a green lung between the old and new architecture, belongs to an entity comprising three historically interrelated buildings: church, school and old rectory. Nothing else is shown on the plan, emphasising the point. The neighbouring Old Rectory is Grade II*, with a Stable Barn and the tithe barn (listed as 'barn conversion', confusingly, as it is not converted) which are both listed Grade II.



The Old Rectory



Blakeney Primary School (Grade II); and according to the Listing description:

"School built 1825, with extensions in 1894, c1970 and c2010. The 1825 school was constructed with local flint, having a red brick dentilled eaves course, quoins, window and door surrounds. The 1894 extension was constructed of red brick laid in Flemish bond. The roofs have replacement pantile covering throughout."

Group value for the Blakeney Primary School is characterised as follows:

"Group value: for the group value it holds with other designated structures which lie in close proximity, including the Grade I listed St Nicholas' Church, a former school house listed at Grade II and the former rectory listed at Grade II*."



St. Nicholas, Blakeney (Grade I), and Blakeney Primary School on left

Relationship with Old Rectory and its setting:

The architectural correspondence between the New Rectory and the Old Rectory is very evident in their external appearance. Shared features including roughcast rendered walls, high-pitched roofs, the use of gables, tall chimneys and approach to fenestration, which reflect a conscious echoing of the Old Rectory when the New Rectory was built in 1925. The New Rectory was built at right angles to the Old Rectory, with the main entrance to each building visible from the entrance to the other. Were the New Rectory to be restored to its original appearance (for instance, by reinstating the leaded light windows) and if the render were limewashed, this correspondence would be even more obvious. In its appearance — a contemporary 1925 design that at the same time asserts a relationship with its older neighbour — New Rectory provides a significant architectural reflection of this phase of Blakeney's ecclesiastical history.

Sight lines exist at multiple points between the Old Rectory and New Rectory. At all times of year, there are views from the Old Rectory in which the New Rectory is visible. In winter and spring, when the trees are fully bare, and depending on light conditions, the views are prominent. The neutral tones of the existing roughcast render blend well with the woodland surroundings, however, while the varied roofline blends gently into the treeline.

The setting of the Old Rectory includes the 'creation of designed gardens'. Although these await full restoration, the views from the principal south-facing lawn of the Old Rectory demonstrate both the sight lines to the New Rectory and the relationship between the buildings. This is

important, as the two buildings stand very close to one another. The 'wooded' area between the two rectories is only approximately 44m (from New Rectory fence to edge of Old Rectory woods nearest Old Rectory) and 38m to the Old Rectory lawn. There is no woodland on the New Rectory side of the fence, and much of the 'woodland' on the Old Rectory side is currently overgrown gardens, but retaining older planting; e.g. large naturalised drifts of snowdrops, daffodils, and cyclamen hederifolium. These gardens are due to be restored by the present owners.

Relationship with St. Nicholas' Church and its setting:

There is a strong visual connection between the Grade I St. Nicholas' Church and the New Rectory when seen from Wiveton Down and the approach from Holt/Wiveton to Blakeney. Given that it sits on such high ground, the New Rectory is particularly prominent and is an important feature of the landscape setting for St. Nicholas' Church, in visual as well as historic terms.

In certain views, e.g. from the road from Wiveton Down east towards Wiveton, the Old Rectory can be seen together with the New Rectory and Church – again illustrating the visual correspondence between the three buildings.

There is certainly a strong visual link between the New Rectory and the Old Rectory (in the similarity of the appearance of the New Rectory with the Old Rectory and its 20th century phase in particular). The New Rectory also forms an important part of the visual *setting* of the Church, for instance in providing the introduction to it when approached from Wiveton and Holt.

Many other nearby buildings, for example Highfields on the other side of Wiveton Road, also feature render, high chimneys and tiled roof details. The Church is currently seen in the context of a village landscape of tiled roofs (from all directions) and the New Rectory at present fits well into the views which forms a key setting for the Church when approached from the south. The visual impact changes considerably at different times of year – for the 4-5 months of the year when the deciduous woodland is not properly in leaf, the views from the Old Rectory are considerably more prominent.

Section 4 – History of the New Rectory:

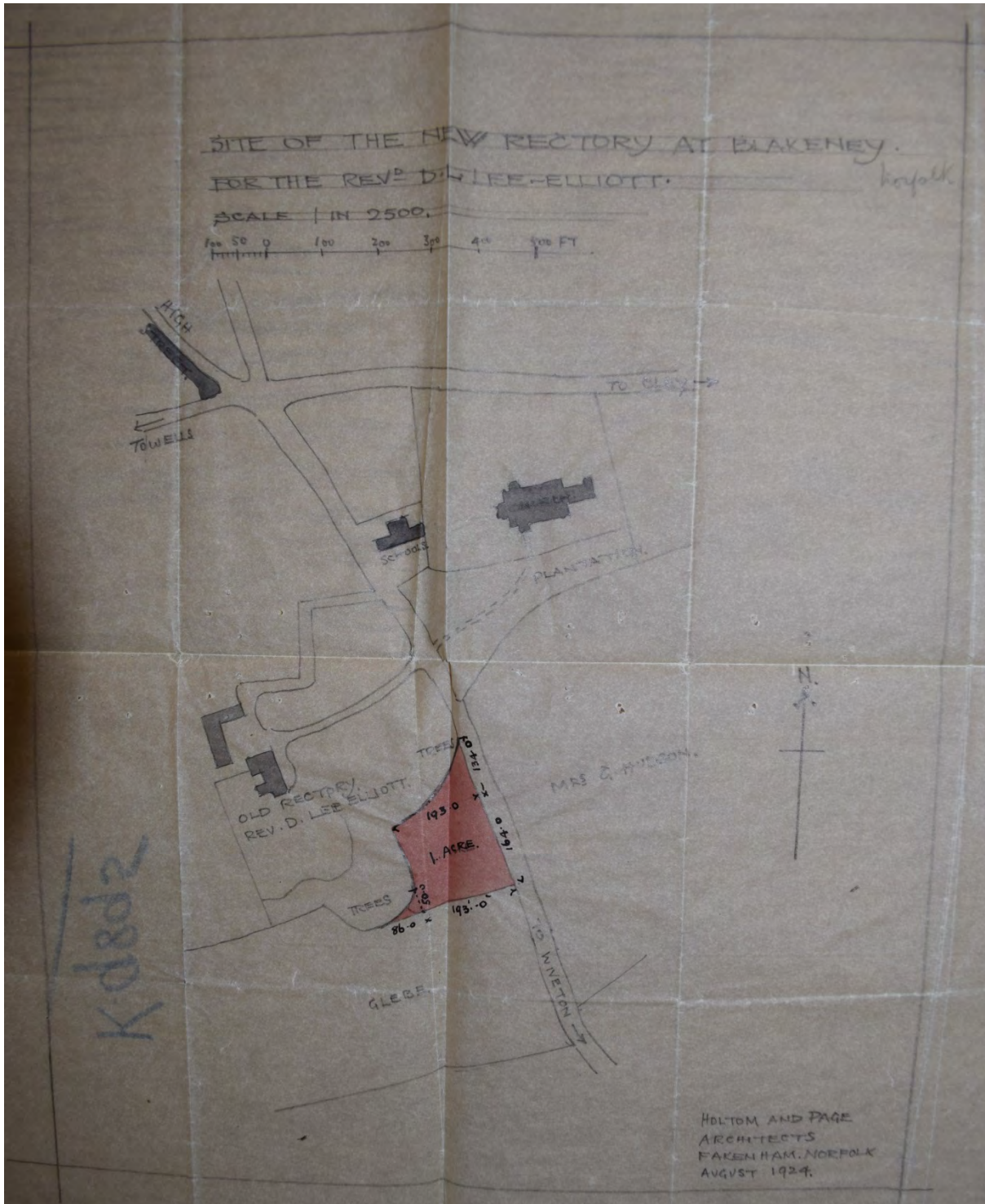
An investigation of the architecture and development of No. 8 Wiveton Road, the New Rectory, 1924-2016:

Map morphology:



1906 Ordnance Survey map showing the symbiotic relationship between Church, Rectory and School before the New Rectory was built below and to the right of the existing rectory, on the non-wooded land in the corner next to the road.

The above shows the virgin site in 1906 before the rectory was built in the 1920s.



August 1924 plan by Holtom and Page showing the relationship of all four sites and the site of the projected New Rectory.

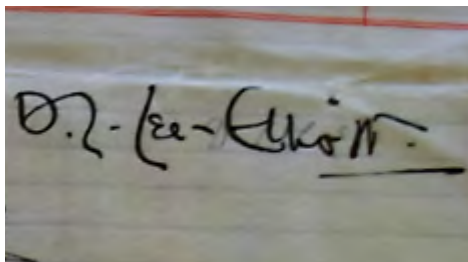


As surveyed with the New Rectory on the map: Norfolk IX.NE (includes: Blakeney; Cley Next the Sea; Letheringsett with Glandford; Wiveton). Revised in 1950, published in 1952.

The 'Rectory manor'/'Calthorpes' (the Calthorpe family were patrons of the living from *c.* 1552 to some point in the 1920s) dates back to the Domesday Book (1086) or beyond, and at one point comprised about 40 acres. Dendrochronology carried out by the Nottingham Tree Ring Dating Laboratory suggests that the Grade II* Old Rectory was built or substantially rebuilt *c.* 1518. It was probably commissioned by the then-incumbent, John Clayton (d. 1541). Additions were made to it in each subsequent century, but always retaining the Tudor era central hall at its core.

When the Old Rectory was sold off by the Church in 1925 for £2,632 16s. 8d., it was a condition of the sale that the Rev. David Lee-Elliott — the last rector to live in the Old Rectory as the incumbent, but also the first private owner — carve a plot out of the corner of the Old Rectory garden and build a new rectory within it. The 'New Rectory', built in 1925 in a late Arts and Crafts manner, was it seems purposefully designed to echo the older building, located within clear sight of it.

David Lee Lee-Elliott:

A photograph of a handwritten signature in black ink on a light-colored, possibly aged, paper. The signature is written in a cursive style and reads "D. L. Lee-Elliott". The signature is centered on the page.

Lee-Elliott's signature, 1924

David Lee Lee-Elliott was born in 1869. He was the son of W. O. Elliott JP of Dunstable. In Lent 1890 he matriculated at Cambridge, non-collegiate, i.e. living in one of the hostels, possibly to save money. He took his BA in 1893 and his MA in 1899. Lee-Elliott was ordained a deacon at Canterbury in 1894, and a priest in 1895.

He was a curate at Pembury in Kent, 1894-96, at Stagsden in Bedfordshire, 1896-98; and at St. George's Brighton, 1898-1890.

Between 1900-1906 he was rector of St. John the Baptist, Southover, Sussex. In 1904 he commissioned a church hall for St. James's Street, Southover, Lewes, from the architectural firm of Messrs Ernest Runtz and Ford.² A photo of this church hall appears on the following page.

² [Http://discovery.nationalarchives.gov.uk/details/rd/19caec7f-83bd-4677-8633-864aec10bce4](http://discovery.nationalarchives.gov.uk/details/rd/19caec7f-83bd-4677-8633-864aec10bce4)



The London-based firm of Messrs Ernest Runtz and Ford only lasted 1904-1909, collapsing in the first instance due to financial disaster *c.* 1909, and then Runtz's death in 1913. The firm is perhaps best known for its work on the Gaiety Theatre in London, but also operated elsewhere in England.³

From 1904 to 1925 it is evident that Lee-Elliott was comfortable with commissioning building projects, that he did so using a reasonably well-known firm of architects, and that he clearly had a fondness for rough-cast render and was *au fait* with the work of contemporary Arts and Crafts practitioners.

In 1900 Lee-Elliott married Winifred Theyre (d. 1939). They had two sons and one daughter. Theyre Lee-Elliott (1903-1988), one of the Rev. Lee-Elliott's sons, went on to become a prominent modernist graphic designer and artist, with works including poster designs, logos, ballet sets and religious art. He was responsible for, *inter alia*, Imperial Airways' 'Speedbird' icon, and also the Air Mail symbol.

In 1906 the Rev. Lee-Elliott gave up his Southover living and was presented to the living of Blakeney, Norfolk by Lord Calthorpe on the death of the Rev. Tillard. At the time, the living of Blakeney was combined with those of Glandford, Cockthorpe and Langham Parva. He was rector there from 1906-1915. Lee-Elliott restored St. Nicholas' Church; and at the Old Rectory, 'two new rooms had been added' — these are the study and what must have been at the very least a substantial remodelling of what is now the school room.

³ [Http://www.scottisharchitects.org.uk/architect_full.php?id=207819](http://www.scottisharchitects.org.uk/architect_full.php?id=207819)

Given the style of the work and the fact that Lee-Elliott's predecessor was very old by the end of his tenure (hence unlikely to commission new work), it seems that he was responsible for e.g. the radiators and radiator cases, as well as the tiled fire surrounds throughout the Old Rectory.

From 1918 to 1920, Lee-Elliott was vicar of Maxstoke, Warwickshire, where he hired Maxstoke Castle as his residence.⁴

He returned to Blakeney in 1924 and was rector there 1924-25. Lee-Elliott was the last rector to live in the Old Rectory there as the incumbent. In 1924, the Church of England sold the Old Rectory to Lee-Elliott, who then lived in it as a private owner.

In June 1935, Lee-Elliott sold the Old Rectory to Mrs Frida Brackley (nee Mond), wife of Air Commodore Herbert Brackley, DSO DSL. Lee-Elliott was still living in Blakeney in 1942 (c.f. *Who's Who*, 1942). Lee-Elliott relinquished Holy Orders in 1943 for reasons unknown. He died on 14 March 1956.⁵

As mentioned above, when rector of Blakeney from 1906-1915, he evidently carried out work to the Old Rectory, such as the entrance to the north courtyard with the rector's study above. This is a fine room with good solid Arts and Crafts detailing such as integrated bookshelves and elegant housing and hiding of a radiator below the bay window (and side window too); the whole treatment of the bay window end of the room is very considered and architectural. The classical chimneypiece in this room is an oddity; does it date from later works or was it deliberately classical in an Arts and Crafts room?

Lee-Elliott was clearly a discerning client. Other interventions to the Old Rectory were a number of Arts and Crafts timber chimneypieces, with cubbyholes in the over mantels for ceramic ornaments, in the bedrooms and probably new windows and curtain housing units integrated into the ceiling cornices. Did Lee-Elliott use Messrs Ernest Runtz and Ford for this work too, or did he employ a more local firm of architects — for instance, Holtom and Page?

⁴ [Http://www.weddingtoncastle.co.uk/uploads/1/9/5/1/19515001/maxstokecastle.pdf](http://www.weddingtoncastle.co.uk/uploads/1/9/5/1/19515001/maxstokecastle.pdf) p.18.

⁵ Basic biographical outline: *Alumni Cantabrigiensis*.



The undated entrance to the courtyard with the rector's study above



Inside rector's study looking towards the bay window



Old Rectory chimneypiece installed by Lee-Elliott

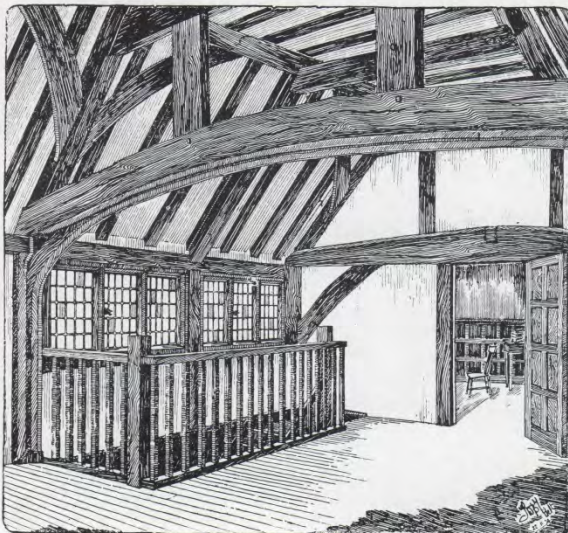
When Lee-Elliott was required to construct the New Rectory in 1925 as a condition of acquiring the Old Rectory as a private house, he carved a one acre plot out of his garden to do so. The Church of England Record Centre has much information on this transaction, in the file QAB/7151 K9895:

Having purchased the Rectory House and Glebe Land of Blakeney for £2,550 and £250 in 1924, Lee-Elliott granted one acre of his land as the site for the new rectory.⁶ This was done by way of free Gift according to The Queen Anne's Bounty Act, 1838, and The Parsonage act, 1865. The size of Lee-Elliott's land purchase was 2 acres, 2 roods and 15 perches lying on the west side of the Old Rectory and 7 acres, one rood and 16 perches lying on the south side of the premises. The existing rectory was described at the time thus: 'All that messuage or dwelling house aforesaid now or late known as and constituting Blakeney Rectory with the stabling Coach House Garage barn outbuildings and gardens'.⁷

The New Rectory, No. 8 Wiveton Road, was designed in 1924 by Holtom and Page, a practice not now well documented. Little is known of them and this report perhaps represents the first partial investigation into their work. Edward Gibbs Holtom was in practice from about 1900-1930. Holtom's best known work is probably Stratford-upon-Avon Public Library, Henley Street, funded by Carnegie. This is an early 16th century timber-framed house, but partly restored and part new by Holtom, in 1903-05. Holtom also designed two blocks (Nos. 57-60) on Bard's Walk, with half-timbered gables in 1901-02.

⁶ Requisitions-on-Title: 'Free gift of one acre of land as a site for a Parsonage House.' 27 October 1924.

⁷ Indenture, 3 June 1924.



Stratford-upon-Avon Public Library, EDWARD GIBBS HOLTOM, Architect.
General Contractors: Cox, Harris and Son, Evesham Place, Stratford-upon-Avon.
Iron Casements: Henry Hope and Sons, Ltd., Lionel Street, Birmingham.

Stratford-upon-Avon Public Library, by Edward Gibbs Holtom, 1903-05



The Stratford library evidently shows that Holtom was skilled at creating new work in a contextual historical setting, as he would do at Blakeney over twenty years later.

F.W.B. Yorke should be mentioned here, for some of his early work was done in association with Holtom and Charles W. Denny. Yorke was responsible, with the better-known Francis Reginald Stevens Yorke (1906–1962), known professionally as F.R.S. Yorke, Modernist architect and author, for Seven cottages, Stratford-on-Avon (1939).

The New Rectory is fully documented in terms of records housed at the Church of England Record Centre. File E5067 contains very detailed information ranging from a

‘Schedule of Work and materials required for the erection of a Rectory at Blakeney, Norfolk for the Rev. D. Lee Elliott, M.A., according to Drawings prepared by and under supervision of E.G. Holtom, F.R.I.B.A., -and- John Page, B.A., A.R.I.B.A. Architects Fakenham, Holt & Blakeney. September 1924.’

with 15 pages of detailed instructions, to a letter from Bounty Office, No. 3 Dean’s Yard, Westminster, dated 10 February 1926.

As Lee-Elliott was paying for the new rectory, he had complete control over choice of architect: ‘There is no objection so far as the Governors are concerned in your employing a local Architect.’⁸ As of 8 February 1926, works, labour and materials amounted to £2654. 2. 7. The final cost can be taken to be £2687 as this is the valuation for the building cost and associated fees declared on the Fire Insurance Policy dated 1 October 1926.

⁸ Letter to Lee-Elliott from the Bounty Office, 4 July 1924; this is the earliest record in terms of the new rectory.

Here are the original architectural drawings (all copyright of the Church of England Record Centre, South Bermonsdey, London):





The main elevation: North Elevation (copyright Church of England Record Centre)

Materials:

The shell of the building is brick: ‘All bricks to be the best of their respective kinds, hard, sound, square, well burnt and even in size.’ For ‘Facings & Brick Dressings’: ‘The facing bricks to be 2” red sand faced “Firsts” quality from the Costessey Brick Co., Barney, near Thursford, or equal quality, of good colour and shape, with undamaged visible arrises. The tiles for corbelling, labels, lintels, and cills to openings in external facing to be selected red sand faced “Hartshill” roofing tiles with nibs bedded and jointed in waterproofed cement mortar.’ For the roofs in particular: ‘Cover the whole of the roofs with red sand faced “Hartshill” or approved tiles’.

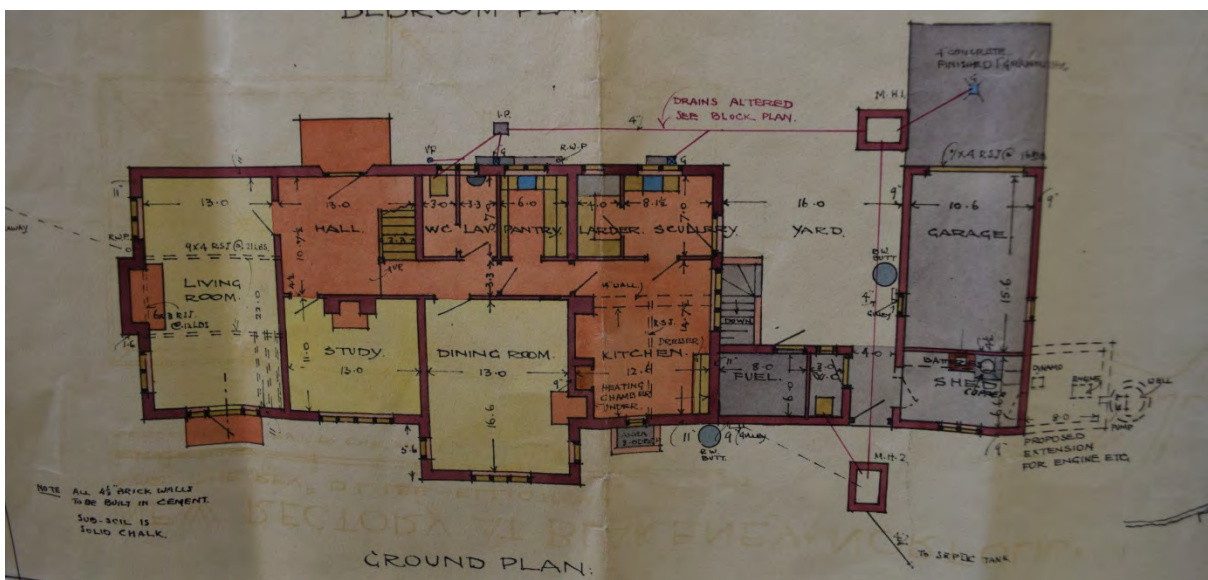
As stated on the above drawing, the walls were to be roughcast finish: ‘Render ¾” thick with waterproofed cement and sand and finish “Roughcast” external brickwork’ and ‘External colouring Rough cast with Dresco colour mixed in’. These elevations show the now missing original leaded lights casement windows and the solid timber front door (perhaps still there behind the modern porch). The original windows were ‘Steel Casements & Leaded Lights’. Unfortunately these have been removed but could easily be reinstated and would make an enormous difference and aesthetic improvement to the appearance of the building, returning it to an Arts and Crafts or Garden Suburb style appearance.



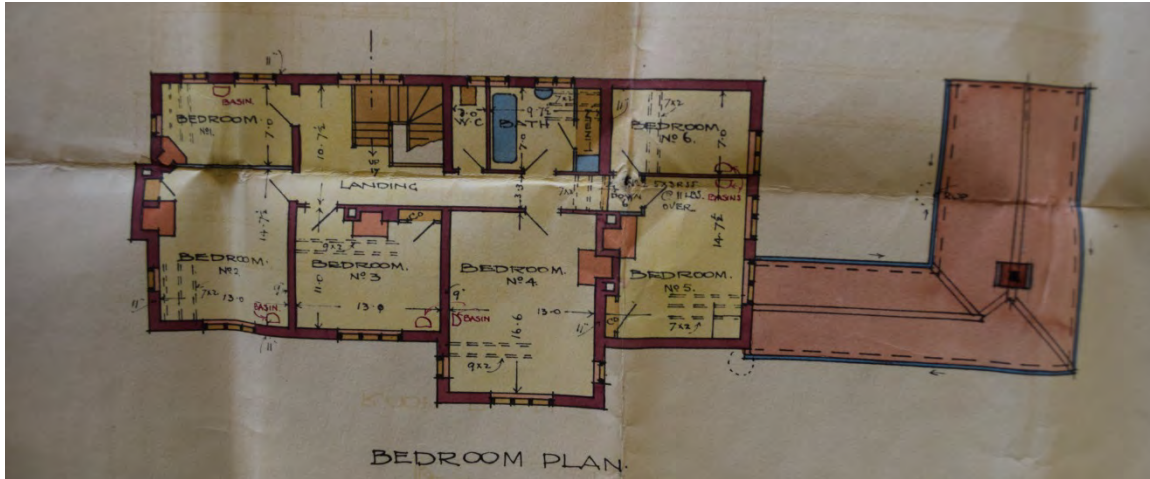
South Elevation: facing rear garden and open fields beyond (copyright Church of England Record Centre)



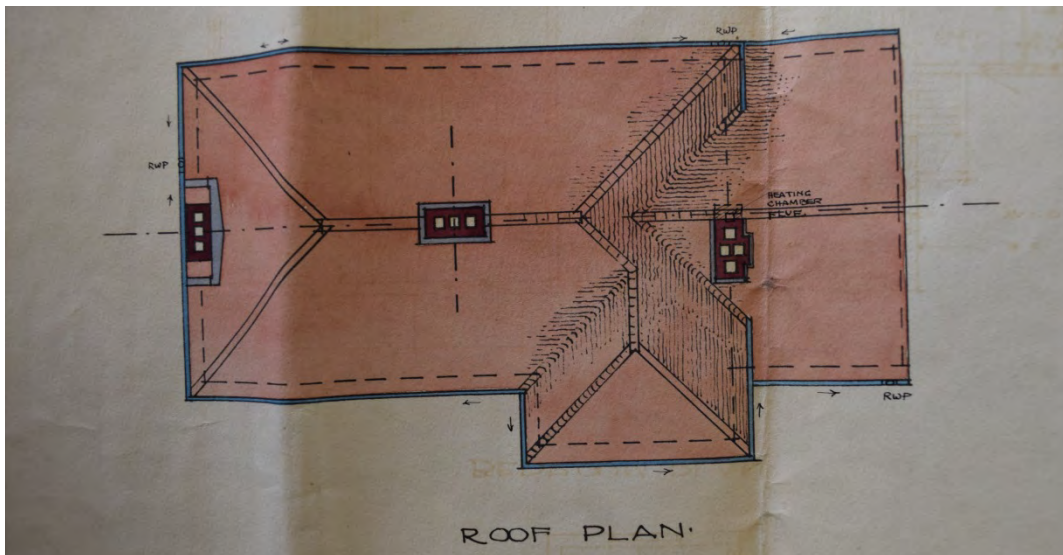
East Elevation with three windows in gable (copyright Church of England Record Centre)

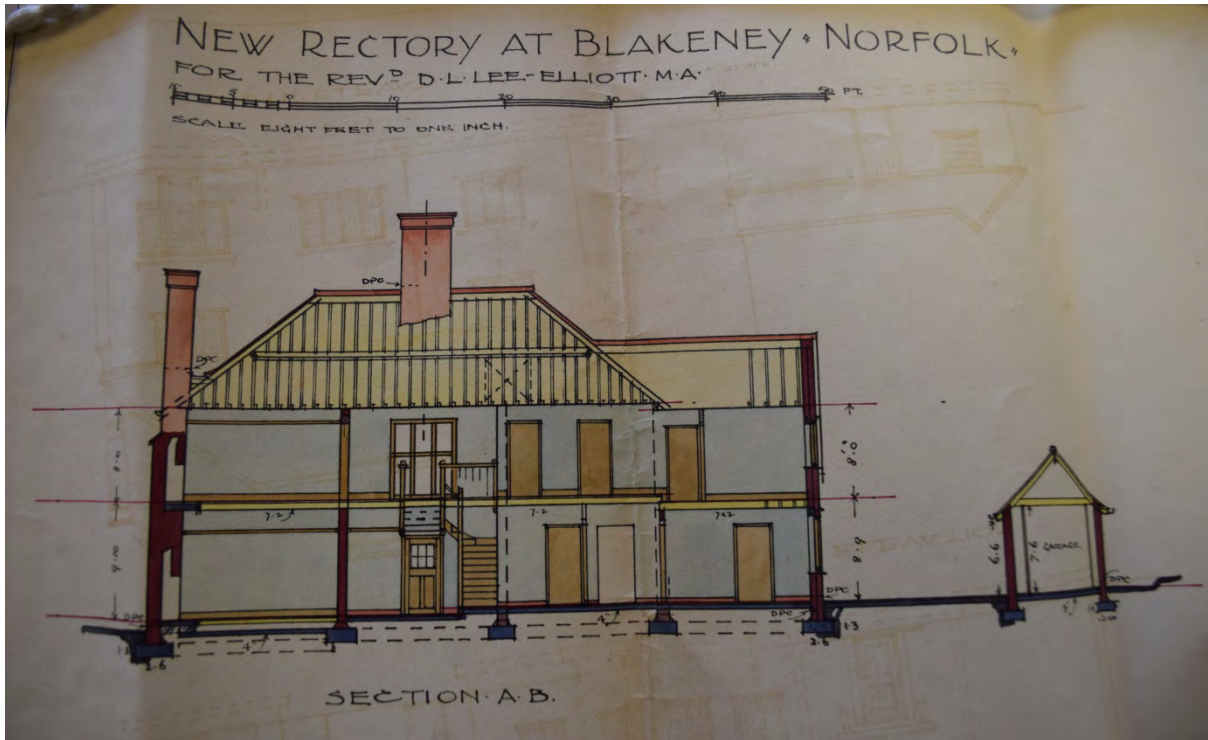


Ground Plan, for the most part executed as per drawing (copyright Church of England Record Centre)



Bedroom Plan, for the most part executed as per drawing (copyright Church of England Record Centre)

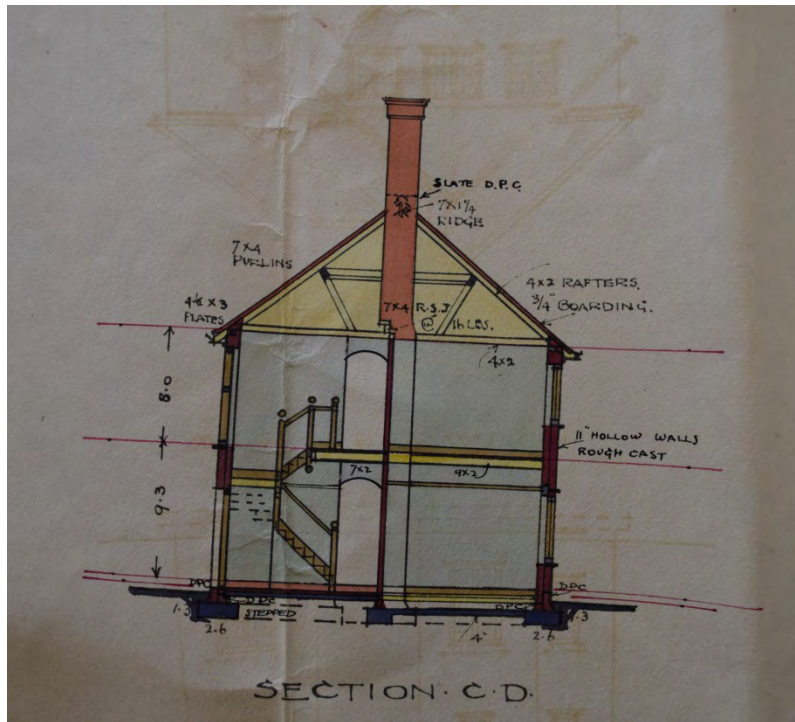




Section A-B (copyright Church of England Record Centre)

The above shows one of the New Rectory's still extant original features and this is the oak staircase, which was to have '3 1/2" x 2 3/4" molded grooved oak Handrail' and then 'Wax polish oak Handrail'.

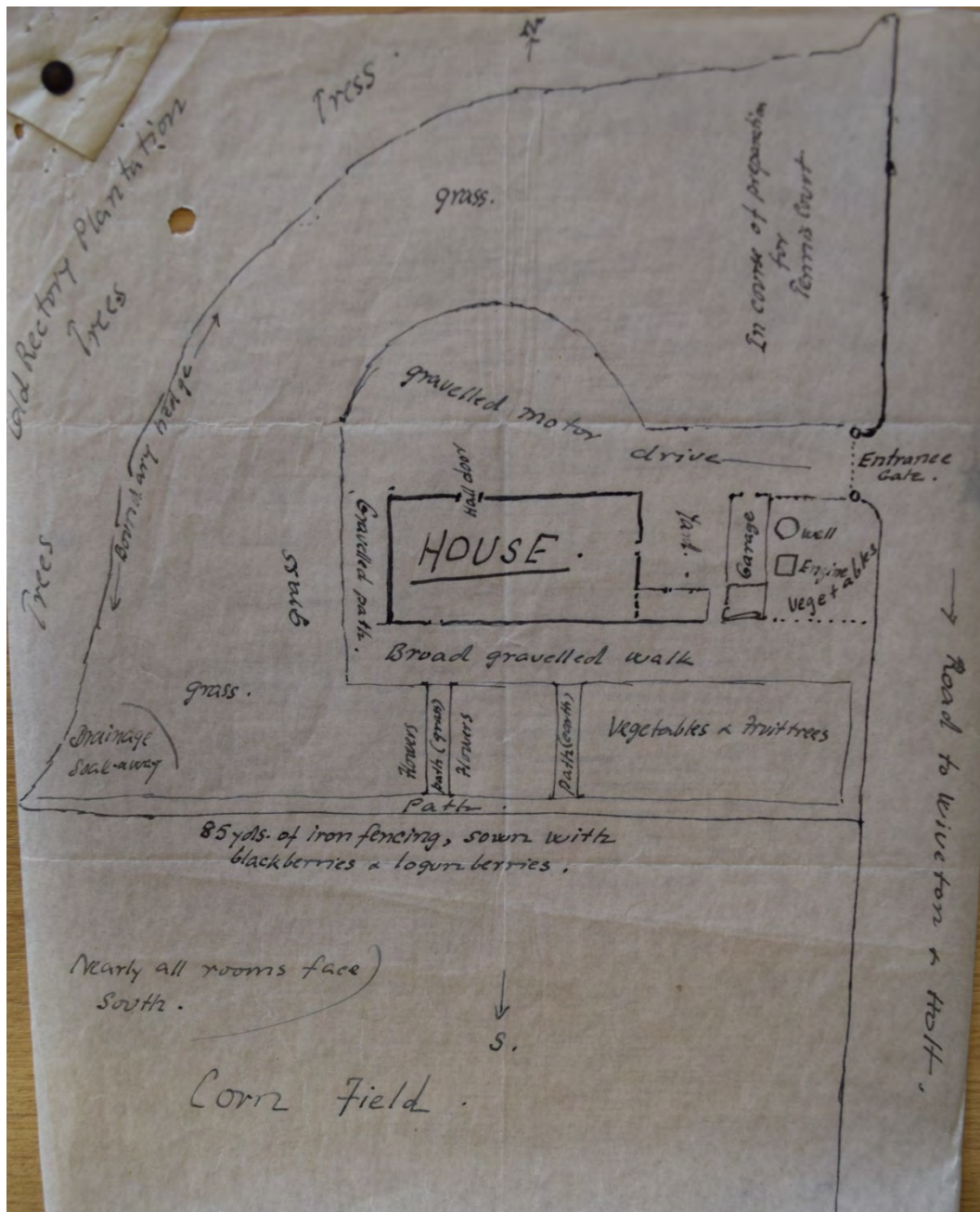
There was to be a 'Kitchen Dresser in Kitchen'; 'Grooved sycamore or Elm draining boards in Pantry.'



Section C-D (copyright Church of England Record Centre)



Note kitchen garden and tennis court (copyright Church of England Record Centre)



This shows the intended landscaping of the one acre plot, 18 November 1925 (copyright Church of England Record Centre)

When Mrs Frida Brackley (nee Mond) bought the Old Rectory from the Rev. Lee-Elliott in c. 1934, the historic 40 acres had been reduced to 18 acres, but included basically all the land south of the New Road, between the Wiveton Road and the Saxlingham Roads, all the way down towards Wiveton. Frida Brackley was an exceptionally devout Anglo-Catholic and was very intent on sustaining the links between the older and newer buildings, which is why, despite what is shown in the proposed landscaping above, after 1934 no fencing or hedging was ever allowed to exist between the two.

Other than the recent loss of the steel casement windows and the addition of the front porch, it seems not much has been done to the building since it was built in 1925. The New Rectory was, in turn, sold off by the Church in c. 2014.

Holtom and Page:

Although we have briefly mentioned Holtom's work above, here is a resume of what little is known of the practice that built the New Rectory, Holtom & Page:

- 1) *Kelly's Directory* shows that Edward Holtom was living at Acacias, Station Road, Holt in 1922, 1925, and 1929.
- 2) In 1925, Holtom & Page, architects, were at Bridge Street, Fakenham.
- 3) In a different section of the 1925 *Directory*, Holtom & Page, architects, were listed at Bridge Street, Fakenham, and Holt and Blakeney.
- 4) In yet a different section of the 1925 *Directory*, there is a reference to John Page BA, ARIBA, firm: Holtom & Page, Bridge Street, Fakenham, Langham and Blakeney.
- 5) In the 1929 *Directory*, there is a reference to Holtom & Page, architects, of Blakeney, as well as a listing for them in Holt, and also of 'The Square, Fakenham, and also Holt & Blakeney'
- 6) The 1929 *Directory* is the last one available online that lists them.
- 7) For Edward Holtom in Holt (1933-34) there is the following entry in *The London Gazette*:

HOLTOM. Edward Gibbs,
"The Green," Shottery, Stratford-on-Avon, in the county of
Warwick, and lately residing at "The Acacias," Holt, in the county of Norfolk.
ARCHITECT.
Court—NORWICH.
Xo. of Matter—22
of 1933. Day Fixed for
Hearing—Feb. 14, 1934. 10.30 a.m.

John Page:



John Page as a young man



John Page as a young architect

These photos are reproduced from the online account of the creation of the Great Ryburgh 'Think and Thank' chancel screen, to be found at <http://standrewsgreatryburgh.org.uk/world-war-1-commemorations/the-think-and-thank-screen/the-quotthink-and-thankquot-screen-9531.php>, copyright Peter Trent 2014.

Of the younger John Page it seems more is known, because he was very local. Local historian Pamela Peake of the Blakeney Area Historical Society spoke with John Page's son in 2001 and from memory he mentioned property in the area, including Blakeney that his father had either designed, modified or to which he had made additions. No details were provided, except for the following list of works:

- Priory House, modification
- Highfield House
- Mansard
- White Friars, the original build
- Several houses in Coronation Lane
- Old Garden Cottage on the Quay
- Several barn conversions along the Quay
- Pye's garage and several others along the Morston Road



Pye's Garage, Blakeney

Above is Pye's Garage — officially Blakeney Garage — but often called 'Pye's' after its original owner. For anyone who knows the coast road well, it is a landmark. Although only a garage, the roof is in the vernacular pantiled manner, very much found throughout Norfolk.

John Page was Blakeney born and bred. As the list of his work demonstrates, he was responsible for much of how Blakeney now looks. Page is an architect who strikes a chord locally and still recalled 44 years after his death in 1973. Page was also responsible for:

No. 1 Kettle Hill (remodelling) and work to a couple of other houses on the Langham Road.

Blakeney War Memorial, New Road, included, from the start, both the two 'Memorial Cottages' cottages and the actual flint and brick memorial as one integral unit, all created in 1921. Indeed the fenestration, roofs and chimneys of the Memorial Cottages look like the work of John Page.



The Blakeney War Memorial, New Road, 1921

The above shows that Page was a highly competent designer.





Memorial Cottages

Page was also responsible for the War Memorial and Thankoffering Screen at St. Andrew's Church, Great Ryburgh, 1921:



Great Ryburgh Screen, Copyright Peter Trent

Page also designed the new altar in the restored Chapel of St. Thomas in the same church, 1921: 'The architect was Mr. John Page of Langham and the whole work of the screen was carried out by those who claim Norfolk as their native county.'

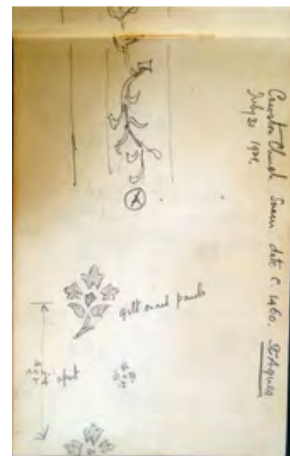
In July 1921 Page was conducting historical precedent research in Norfolk for the design of the new screen:

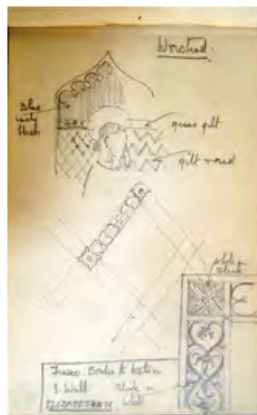
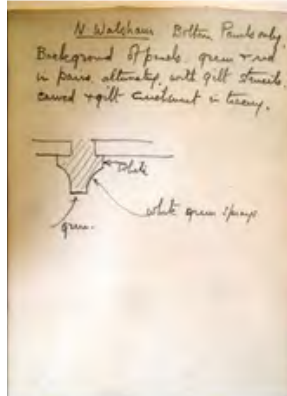
It is fascinating to show here (by the kind permission of the owner) sketches of Norfolk screens made by the architect John Page in July 1921 undoubtedly as part of his research for the design of the new memorial at Ryburgh.. The pages are reproduced here in full:

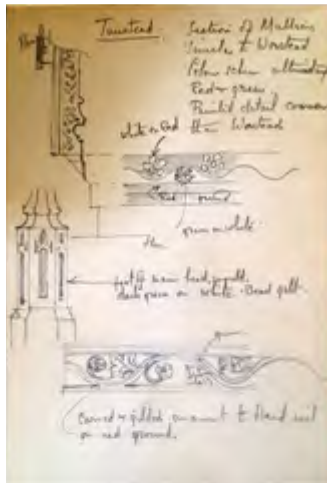


Places.

Causton. 1460.
 Apscham 1507
 Tunstrod
 Barton Turf. 1497
 (Knapton and Knapton).
 N. Walsham.
 Edingtonhoe 1497.
 Knapton
 Trench 1502
 Truningham.







Boston Turf

Tracing over panels of mullions white with fillets red & green alternating between each mullion, or 2 panels red 2 green. Gold carved scroll motifs. Black & gold B. Pile fillets heads. Buttresses white with gilt feet edge. Inscription on rail Black on white ground.

Edging thence 14th cut
Turned fillet into mullions
fillets in tracing fillets red
bottom grey or white
Knapton & Peter Ford
Good screen ground. gilt scrolls
Roof excellent double hammer beam
Span 33ft.



Grateful thanks are due to Dr. George Agnew, Mr. Elizabeth Savory and Mrs. Pat Ryder for the generous loan of their family archive and source materials that made this article possible.
Copyright Peter Trent 2014

These photos are reproduced from the detailed online account of the creation of the Great Ryburgh 'Think and Thank' chancel screen, to be found at <http://standrewsgreatryburgh.org.uk/world-war-1-commemorations/the-think-and-thank-screen/the-quotthink-and-thankquot-screen-9531.php>, copyright Peter Trent 2014.

John Peake of the Blakeney Area Historical Society has informed this appraisal of Page thus:

‘He was involved in many aspects of the village besides being an architect, his son only recently died and there still is a grandson living in Langham. There are quite a few buildings designed by him in Blakeney. John Page was also a Churchwarden, a Parish Councillor and sometime Chairman of the Council.’

Perhaps Page’s most interesting commission seems to be the restoration of East Barsham Manor, Norfolk, here seen in March 1974:



East Barsham Manor, Norfolk, is a fine example of a highly decorated brick Tudor manor house and stood as a ruin until the early 20th century, when it was restored and returned to a house of status in two campaigns in the 1920s and 1930s. Douglas Coleman carried out a partial restoration in 1922, using John Page, of Holtom and Page of Blakeney. The east end was made sound and the finials restored. The architect William Weir of the Society of the Protection of

Ancient Buildings visited the house in 1922 and was given a tour by Page. Work was then still in progress. Weir urged Page to avoid flat, modern plaster finishes and to consider 'following the irregularities of the old walls with a thin coat of plaster in a similar way to the old work'.

On 5 January 1924 *Country Life* reported: 'Under the supervision of Mr. John Page of neighbouring Blakeney, alterations and renewals have been effected to make the farmhouse portion a more complete and serviceable residence for present occupation, and whether the extremely difficult and none too desirable job of conjecturally rebuilding the hall and its adjacent parlours and chambers will ever be undertaken seems to be a matter of doubt.' This would eventually take place in the 1930s, by Page. The shell at the west end was re-created in 1936 for a new owner; 19 October 1936 plans were drawn up for the reconstruction of the western end of the house: the present hall and drawing room on the ground floor.



The great hall; it was re-created in 1936-38 by John Page



The north front: it took this form in the 1930s but still shows how the east end, to the left, was adapted as a farmhouse after the main rooms had fallen in.

At national level, Page's obituary was published in 1974:

'John C. Page, who joined the Architectural Association in 1906, died in September 1973. It seems extraordinary that we should know so little of someone who had been a faithful member for 67 years, but from the A.A. journals of the early part of the century only the following facts can be gleaned:

In the session 1906-1907 he received the First Year award – a book Prize for the best work in the studio – in 1908 he was awarded a 2nd Prize for a Motor Garage and Chauffeur's House (quite a novelty for a design problem at that time!) and his drawings were selected for presentation to the School Portfolio. (It would be interesting to know what happened to that Portfolio!). He was a Cambridge B.A. and an Associate of the RIBA and for many years had lived at Blakeney and supposedly his work was mainly done in Norfolk.'⁹

⁹ Denis Sharp (editor), *AA Notes*, March-May 1974, News Letter no. 37, p. 3.

5. Conclusion:

In summary and conclusion, the New Rectory is a noteworthy instance of an interwar purpose-built Church of England rectory, designed in a simplified late Arts and Crafts idiom. Other than the missing original windows, it appears to be well preserved of its type and should certainly be conserved and perhaps gently renovated, but not destroyed.

Although little known, research carried out for this appraisal reveals Holtom and Page to have been collectively experienced and thoughtful architectural designers when it came to building the New Rectory at Blakeney in 1925. The Rectory very much contributes to the setting in that it blends into the surrounding landscape effortlessly, with a settled, mature appearance, having been here for 92 years.

Moreover, the New Rectory belongs to a meaningful quadripartite comprising itself, the Old Rectory, St. Nicholas' Church and the Old Schoolhouse / Blakeney Primary School grouping. To destroy a fourth of this delicate historical chain would irreversibly upset the existing harmony between these buildings.

Acknowledgements:

Church of England Record Centre, South Bermondsey, London

Pamela and John Peake, Blakeney Area Historical Society, Blakeney, Norfolk

Peter Trent, Great Ryburgh, Norfolk

Application Number: PF/17/0902	Appeal Reference: APP/Y2620/W/18/3196571
Location: Agricultural building adj Bells Cottage, Holgate Road, White Horse Common, North Walsham, NR28 9LP	
Proposal: Conversion to dwelling	
Officer Recommendation: Refuse	Member decision (if applicable): Refuse
Appeal Decision: UPHELD	Costs: AWARDED
<p>Summary:</p> <p>The main issues the Inspector considered were:</p> <ul style="list-style-type: none"> • Whether the proposal would provide acceptable living conditions for future occupiers, with particular regard to odour and noise, and • The effect on the viability of the adjacent poultry business. <p>The Inspector noted the relationship between the proposed dwelling and the adjacent poultry business. He noted that there are other homes in the area as well, almost as close to the poultry unit. He noted the appellant's view that there were inconsistent complaints of noise and odour over the past few years and as such they felt the proposal would be acceptable.</p> <p>The Inspector felt that the EHOs view that there would be a highly likely effect from noise and odour to be unsubstantiated.</p> <p>The Inspector agreed with the findings of the noise report submitted with the application and the appeal, which the EHO had accepted. He felt there were no grounds for refusal.</p> <p>Turning to the viability of the poultry unit, the Inspector felt that the EHO had provided no detailed substantiation over and above the potential for complaints and a statutory nuisance which may threaten the poultry farm's operations. He considered this concern conjectural.</p> <p>A costs application was made by the Appellant on the basis of two grounds:</p> <ol style="list-style-type: none"> 1. The wasted cost of a noise assessment being required 2. The refusal based on EHO objections which are unsubstantiated <p>With regard to point 1 the Inspector considered that this was reasonable and the Council were right to require such an assessment. The costs application failed on this point.</p> <p>Turning to point 2, The PPG warns that local planning authorities are at risk of an award of costs if they behave unreasonably with respect to the substance of the matter under appeal by unreasonably refusing planning applications. Examples of where this might be the case include the failure to produce evidence to substantiate each reason for refusal on appeal and vague, generalised or inaccurate assertions about a proposal's impact, which are unsupported by any objective analysis.</p> <p>The Inspector considered that the Council's Environmental Health Officer (EHO) had found the noise assessment appropriately undertaken and showed the poultry unit would be unlikely to have an adverse impact on the proposed dwelling. However, despite this conclusion, the Council's decision was based on the EHO maintaining an objection in relation to the effect of noise on future occupiers. This was based on historic complaints from a greater distance away and previous experience of the sound generated by the poultry unit cooling fans such that there was doubt over a worse-case scenario having been assessed.</p>	

The Inspector decided that without more detailed evidence from the Council such a worse-case scenario appears hypothetical and unproven and relying on this amounts to a failure to substantiate the reason for refusal. In addition to noise, the Council's concerns over both odour and flies appear to be based on historic complaints without any objective analysis of the current situation and where there is no evidence of such complaints from nearby residents.

The Inspector considered that the Council's position was therefore vague and unsupported.

The Council must now pay the Appellant's costs for the appeal proceedings, limited to those incurred after the decision to refuse planning permission.

Relevant Core Strategy Policies:

EN13 – Pollution minimisation

Relevant NPPF Sections/Paragraphs:

Part 12

Learning Points/Actions:

This decision will be shared with colleagues in EH.

Sources:

Sarah Ashurst – Development Management Manager