

NORTHREPPS – PF/25/0384 - Change of use of land to allow for the siting of two glamping pods (retrospective) at Land East Of Hungry Hill House, Hungry Hill, Northrepps

Minor Development

Target Date: 02 May 2025

Extension of time:

Case Officer: Olivia Luckhurst

Full Planning Permission

CONSTRAINTS:

Norfolk Coast National Landscape (formerly AONB)

Undeveloped Coast

Countryside

Landscape Character Assessment - Tributary Farmland

RELEVANT PLANNING HISTORY:

DE21/17/0010 - Land Adjacent to Farm Buildings At Hungry Hill, Northrepps, NR27 0LN

Proposed change of use to "Glamping Site"

Advice Given (Proposal considered contrary to Core Strategy Policies EC 10 and EC 7)

ENF/24/0195 - Land Adjacent Hungry Hill House, Hungry Hill, Northrepps, Cromer, Norfolk, NR27 0LN - Unlawful development of 2 glamping pods – Enforcement Notice Served.

APP/Y2620/C/25/3363092 - Land Adjacent Hungry Hill House, Hungry Hill, Northrepps, Cromer, Norfolk, NR27 0LN - Unlawful development of 2 glamping pods – Awaiting Decision

THE APPLICATION

Retrospective "Full" planning permission is sought for the change of use of land to allow for the siting of two glamping pods.

The site currently accommodates an agricultural business, accessible via Hungry Hill, and features existing agricultural structures along with Hungry Hill House to the west.

The proposed glamping pods will be situated at the rear of the property, surrounded by close-boarded fencing. The site is located in the countryside policy area and falls within the Norfolk Coast Area of Outstanding Natural Beauty (AONB) and an area designated as Undeveloped Coast.

The retrospective proposal was brought to the attention of the Council's Enforcement team in 2024 which led to the serving of an Enforcement Notice which is currently being reviewed under appeal (APP/Y2620/C/25/3363092).

REASONS FOR REFERRAL TO COMMITTEE:

The application has been referred to committee at the request of Councillor Fitch-Tillett for the following reasons:

Contrary to the position of Council Officers, I believe this proposal should be approved as, in my opinion, it complies with policy EC7 (The location of New Tourism Development) and is in accordance with Policy EC1 (Farm Diversification) as the proposal would make an

ongoing contribution to sustaining the agricultural enterprise as a whole. In addition, the pods replaced large unsightly, and glare producing, glasshouses.

CONSULTATIONS:

Parish/Town Council – No comments received

County Council Highways (Cromer) – **No objections** subject to conditions

Landscape (NNDC) – Objection

The site lies within the Norfolk Coast National Landscape (formerly AONB), a national designation recognising the natural beauty of a landscape. Para 189 of the NPPF requires that 'great weight' is given within planning decisions to the conservation and enhancement of the landscape and scenic beauty of this protected landscape.

In this part of the Norfolk Coast National Landscape, the defined special quality of 'a sense of remoteness, tranquillity and wildness' is particularly relevant to the sparsely populated landscape between the coastal settlements. Dark night skies are a stated feature of this special quality and the area around Hungry Hill between Northrepps and the coast is quiet and rural. This development could not be considered to conserve or enhance this special quality by creating increased activity, traffic movements and external lighting. In this regard there is conflict with Local Plan Policy EN1 and para 189 of the NPPF.

The site also lies within Undeveloped Coast as designated within Policy EN 3 of the adopted Local Plan. Para. 3.3.10 explains that this designation is designed to minimise the wider impact of general development, additional transport and light pollution on the distinctive coastal area. The only development that will be permitted within this designation is that which can be demonstrated to require a coastal location and will not be significantly detrimental to the open coastal character. This is reinforced in paragraph 187 c) of the NPPF which requires planning policies and decisions to 'maintain the character of the undeveloped coast'. This development would be contrary to EN3.

The development is also directly contrary to Local Plan Policy EC10: Static and Touring Caravan and Camping Sites which states that new caravan and camping sites will not be permitted within the Norfolk Coast National Landscape.

The site is a small field in an elevated position tucked behind existing farm buildings in a rural location 800m inland from the coast. Close board timber fencing on the north, east and part of the west site boundaries is not an appropriate boundary treatment in a rural area such as this. That said, the farm buildings obscure views of the site from the north and west. The south and wider east boundary is formed by a mature high hedge which minimises wider visual impact of the fencing and the pods to the east and south.

There is a strong network of public rights of way in the area with Northrepps FP6 extending along the west site boundary and linking to other routes. The landscape and visual impact of the development is relatively contained by the farm buildings and the existing hedge, such that the harm to the designated landscape and the prevailing landscape character would not be assessed as significant, although there would be increased traffic and human activity by day and night.

Should this application go forward for approval, the business should be tightly confined within the red line boundary and should not expand into adjacent fields, as appears to currently be the case with a bell tent in the field south of the site and stored motorhomes west of the site. Minimal external lighting should be secured by condition.

In consideration of all policies relating to this application in this sensitive location there will need to be robust justification for departure from key spatial policies EN1, EN3 and EC10.

REPRESENTATIONS:

No public representations received, public consultation period has expired

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.

LOCAL FINANCE CONSIDERATIONS

Under Section 70(2) of the Town and Country Planning Act 1990 the council is required when determining planning applications to have regard to any local finance considerations, so far as material to the application. Local finance considerations are not considered to be material

RELEVANT POLICIES:

North Norfolk Core Strategy (September 2008):

Policy SS 1 - Spatial Strategy for North Norfolk

Policy SS 2 - Development in the Countryside

Policy SS 4 - Environment

Policy SS 5 - Economy

Policy EN 1 - Norfolk Coast Area of Outstanding Natural Beauty and The Broads

Policy EN 2 - Protection and Enhancement of Landscape and Settlement Character

Policy EN 3 - Undeveloped Coast

Policy EN 4 - Design

Policy EN 6 - Sustainable Construction and Energy Efficiency

Policy EN 9 - Biodiversity & Geology

Policy EC 1 - Farm Diversification

Policy EC 7 - The Location of New Tourism Development

Policy EC 10 - Static and Touring Caravan and Camping Sites

Policy CT 5 - The Transport Impact of New Development

Policy CT 6 - Parking Provision

Material Considerations:

National Planning Policy Framework (NPPF):

Section 2 - Achieving sustainable development

Section 4 - Decision-making

Section 6 – Building a strong, competitive economy

Section 8 - Promoting healthy and safe communities

Section 12 - Achieving well-designed places

Section 15 - Conserving and enhancing the natural environment

Supplementary Planning Documents and Guidance: North Norfolk Landscape Character Assessment

OFFICER ASSESSMENT:

MAIN ISSUES FOR CONSIDERATION

- 1. Relevant Appeal Decision**
- 2. Principle of Development**
- 3. Design and Impact on the Character of the Area**
- 4. Impact on Amenity**
- 5. Highways**
- 6. Biodiversity**
- 7. Planning Balance and Conclusion**

1. Relevant Appeal Decision

It should be noted that a full application for the siting of two glamping pods for holiday use located some 700m to the west of the application site was recently refused and upheld at appeal (application ref: PF/22/1708), a copy of the decision attached at **Appendix 1**.

In that case, the Inspector concluded that the proposal used was not suitably located and failed to conserve or enhance the Norfolk Coast National Landscape (formerly known as AONB). In addition, the Inspector stated that "occupiers of the pods are more likely to travel by private motor vehicle to nearby recreation sights and services/facilities, increasing traffic levels, light pollution and noise undermining the tranquillity of the surroundings and dark night skies later in the evenings. As a result, the proposal conflicts with the development plan when taken as a whole and there are no material considerations, either individually or in combination, that outweighs the identified harm and associated development plan conflict. "

Officers consider that the above appeal decision is a material planning consideration which should attract significant weight in the determination of this application. The appeal relates to similar proposals in a similar location assessed under identical policies.

2. Principle of Development

Planning applications are considered against the policies within the North Norfolk Core Strategy that are relevant to the particular proposal, as identified above.

The Council's Spatial Planning Strategy is set out in policy SS 1 of the Core Strategy. This policy defines a settlement hierarchy with the aim of directing most development to the district's larger settlements and lesser amounts to lower tiers in the hierarchy. All the remaining area falls within the lowest tier of the hierarchy, being defined as Countryside, where development is restricted to particular types of development only.

The types of development acceptable in principle within the Countryside area are set out in policy SS 2. These include proposals for recreation and tourism. Proposals for such uses would then need to be considered against other policies with more detailed, specific criteria.

Policy EC 1 supports development in the countryside for the purposes of farm diversification where it can be demonstrated that the proposal would make an ongoing contribution to

sustaining the agricultural enterprise as a whole and the proposal would not involve new-build development on undeveloped sites unless it is directly related to the agricultural business.

The supporting statement from the applicants indicates that due to continuous changes and heightened competition in the horticultural sector, along with the limited profits generated from this aspect of their operations, Northrepps Farming Company has decided to shut down the nursery site. In light of this, they are now focused on optimising the returns from their land and are actively seeking to diversify their income sources. While the broader farming activities persist, the introduction of small-scale tourist accommodation presents a new revenue opportunity on the site previously occupied by the nursery glasshouse.

Therefore, the proposal is considered to comply with policy EC 1, however, the development conflicts with other policies in the Development Plan as explained below.

Policy EC 7 supports new tourist accommodation and attractions located in a sequential approach. Proposals for new build tourist accommodation and attractions should be located within the principal and secondary settlements. Within the service villages, coastal service villages and the countryside, proposals for new tourist accommodation and attractions will be permitted in line with other policies. However, the policy goes on to confirm that proposals for new build unserviced holiday accommodation in the countryside will be treated as though they are permanent residential dwellings and will not be permitted.

Given the location of the site within the designated countryside, it is considered that the proposed development conflicts with Policy EC 7.

Policy EC 10 of the Core Strategy states that proposals for new static caravan sites or woodland lodge holiday accommodation will only be permitted where they result in or the removal of an existing cliff top static caravan site or the relocation of existing provision which is within the coastal erosion constraint area or Environment Agency Flood Risk Zone 3. However, the policy goes on to state that new touring caravan and camping sites will not be permitted within the Norfolk Coast AONB, undeveloped coast or Environment Agency Flood Risk Zone 3. With regards to the proposal, none of these exceptions apply and furthermore, the site is located within Norfolk Coast National Landscape (formerly AONB) and an area of Undeveloped Coast.

Accordingly, Officers consider that the proposed development would conflict with the aims of Core Strategy Policies EC 7 and EC 10 and this conflict would weigh heavily against the grant of planning permission.

3. Design and Impact on the Character of the Area

The site is located within the Norfolk Coast National Landscape (formerly AONB), underscoring its natural appeal. As stated in paragraph 189 of the National Planning Policy Framework (NPPF), planning decisions should prioritise the conservation and enhancement of the landscape's scenic beauty. This particular section of the Norfolk Coast National Landscape is notable for its unique sense of remoteness, tranquillity, and wildness, especially in the sparsely populated areas between coastal settlements. The region features dark night skies, with the area around Hungry Hill, situated between Northrepps and the coast, being particularly quiet and rural. The proposed development would not maintain or enhance this distinctive quality, as it would result in increased activity, traffic, and external lighting, thus conflicting with Core Strategy Policy EN 1 and paragraph 189 of the NPPF.

Furthermore, the site is classified as part of the Undeveloped Coast under Policy EN 3 of the Core Strategy. Paragraph 3.3.10 specifies that this designation seeks to mitigate the broader impacts of development, transportation, and light pollution on the unique coastal environment.

Only developments that can prove a necessity for a coastal location and that do not significantly compromise the open coastal character will be allowed. This requirement is reinforced by paragraph 187 c) of the NPPF, which stresses the importance of preserving the character of the undeveloped coast. Consequently, the proposed development would be at odds with Policy EN 3.

In addition, the site is classified as Tributary Farmland within the North Norfolk Land Character Assessment. The Tributary Farmland Type is characterised by generally open and rolling/undulating rural farmland with some elevated plateau areas and a rich diversity of minor settlement, woodland and historic estates. Areas of this kind are protected by policy EN 2 which states 'Proposals for development should be informed by, and be sympathetic to, the distinctive character areas identified in the North Norfolk Landscape Character Assessment and features identified in relevant settlement character studies.'

The development proposes two glamping pods designed with cream composite timber cladding and anthracite windows and doors. Each pod offers a raised decking area and accommodates one unit with a single bed and another with two beds. Additionally, the site features a gravel parking area and formal brick weave pathways that connect to the pods. Surrounding the area is close-boarded timber fencing, with existing structures located to the south.

The site is a modest field located at a higher elevation, tucked behind existing agricultural structures in a rural area about 800 meters from the coast. This elevated position provides a distinctive view of the surrounding landscape, merging agricultural and natural elements. While the close board timber fencing along the northern, eastern, and part of the western boundaries serves a functional purpose, it seems somewhat incongruous in this rural context, diminishing the area's overall aesthetic appeal. Nevertheless, the presence of farm buildings effectively blocks views from the north and west, offering a level of privacy and seclusion. To the south and along much of the eastern boundary, a mature, tall hedge significantly reduces the visual impact of both the fencing and the pods situated to the east and south.

The area boasts a robust network of public rights of way, with Northrepps FP6 running along the western boundary and connecting to various other paths. The visual and landscape impact of the development is largely mitigated by the presence of farm buildings and existing hedgerows, suggesting that any adverse effects on the designated landscape and its character would not be deemed significant. However, it is important to note that there will be an increase in traffic and human activity both during the day and at night as a result of the proposed development.

Overall, whilst the proposal is well enclosed by fencing and hedging and would be partially screened by the existing agricultural buildings, some views of the pods would still be available from the public realm. In addition, the use would result in additional traffic and user activity in a rural area. The site is considered to be in an unsuitable location given its position within the Norfolk Coast National Landscape, area of Undeveloped Coast and the open countryside. Development of this type is not considered appropriate in such sensitive areas and therefore, the proposal is considered contrary to Core Strategy Policies EN 1, EN 2 EN 4, EC 7 and EC 10.

4. Impact on Amenity

Policy EN 4 of the Core Strategy stipulates that development proposals must not significantly harm the residential amenity of adjacent properties.

The proposed glamping pods are located behind existing agricultural buildings and enclosed by close-boarded timber fencing. Positioned away from the road, with a large parking and

turning area to the north separating the site from the street scene. The nearest residential property is 125m to the southwest, across Hungry Hill Road, providing a sufficient buffer between the site and adjacent properties.

Additionally, the glamping pods have access to a limited amenity area, which restricts activities that may produce noise. Given the small scale of the development and the distance from neighbouring properties, Officers consider that the proposal would not result in significant noise disturbances or loss of privacy and therefore, complies with Core Strategy Policy EN 4.

5. Highways

The application site is host to an existing access off Hungry Hill Road which will be utilised by the proposed glamping pods and for agricultural operations. No objection has been received from the Highway Authority.

The site provides a sufficient amount of parking and, as such, is considered to comply with Core Strategy Policies CT 5 and CT 6.

6. Biodiversity / Ecology

Policy EN 9 sets out that development proposals should protect the biodiversity value of land and buildings and minimise fragmentation of habitats, maximise opportunities for restoration, enhancement and connection of natural habitats and incorporate beneficial biodiversity conservation features where appropriate. Development proposals that would cause a direct or indirect adverse effect to nationally designated sites or other designated sites or protected species will not be permitted unless prevention, mitigation and compensation measures are provided.

Biodiversity Net Gain

Biodiversity net gain (BNG) is a way of creating and improving natural habitats. BNG makes sure development has a measurably positive impact ('net gain') on biodiversity, compared to what was there before development.

In England, BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Developers must deliver a BNG of 10%. This means a development will result in more or better-quality natural habitat than there was before development. However, certain types of developments are not subject to Biodiversity Net Gains requirements, retrospective planning permission being one of these.

GIRAMs

A new Norfolk wide Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS) came into effect from 1 April 2022. This is a strategic approach to ensure no adverse effects are caused to European sites across Norfolk, either alone or in combination from qualifying developments and ensures that applicants and local planning authorities meet with the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended). The GIRAMS Strategy applies to all net new residential and tourism-related growth. The proposed development would result in the creation of two new self-contained units of tourist accommodation and a RAM'S tariff of £147.85 is required in line with the above strategy. The agent confirmed agreement to the payment of this tariff, and this has now been received as of 11.03.2025. For the above reasons, the proposal is considered to comply fully with the GIRAM requirements and comply with Core Strategy Policies SS 4 and EN 9.

7. Planning Balance and Conclusion

In accordance with Section 38(6) of the Town and Country Planning Compulsory Purchase Act 2004, planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise.

Although the proposed development is viewed as a form of farm diversification that could provide an additional income stream for the farming business in line with policy EC 1, its location within the Norfolk Coast National Landscape (previously designated as an AONB) and an area of Undeveloped Coast weighs against the grant of planning permission. While the proposal benefits from being well-enclosed by fencing and hedging and would be partially obscured by existing agricultural structures, some visibility of the pods would remain from public areas.

Furthermore, the development would lead to increased traffic and activity in this rural setting. Consequently, the proposal is deemed inconsistent with Core Strategy Policies EN 1, EN 2, EN 4, EC 7 and EC 10 of the Core Strategy, as well as paragraphs 135 and 89 of the NPPF.

RECOMMENDATION:

REFUSAL for the following reasons:

1. The proposed development would result in the introduction of new build tourist accommodation on land designated as 'Countryside' in Policies SS 1 and SS 2 of the adopted North Norfolk Core Strategy, where Policy EC 7 states that Proposals for new build unserviced holiday accommodation in the Countryside will be treated as though they are permanent residential dwellings and will not be permitted and where Policy EC 10 specifically prohibits the principle of new caravan and camping sites within sensitive landscape designations including the Norfolk Coast Area of Outstanding Natural Beauty. Therefore, the proposed development is considered to be contrary to policies SS 1, SS 2, EC 7 and EN 10 of the Core Strategy.
2. A development of 2 no. glamping pods in this location would constitute an unacceptable form of development within the Norfolk Coast National Landscape and would harm the special qualities of the area, in particular its remoteness, tranquillity, and rural attributes. contrary to the requirements of Policies EN 1, EN 2 and EN 4 of the adopted North Norfolk Core Strategy, Chapter 15 of the National Planning Policy Framework and the principles set out in the North Norfolk Landscape Character Assessment (2021) and the North Norfolk Design Guide Supplementary Planning Document.

Final wording of reasons for refusal to be delegated to the Assistant Director for Planning.