

CROMER – PF/24/2341 - Erection of 5 commercial units for uses within Use Classes E(g)(iii) - industrial process suitable for residential area and B8 - storage or distribution at Home Farm Enterprise Zone, Hall Road, Cromer, Norfolk

ADDENDUM REPORT

Minor Development

Original Target Date: 09.01.2025

Extension of Time: 30.09.2025

Case Officer: Russell Stock

Full Planning Permission

REASON FOR ADDENDUM REPORT

This Addendum Report is to update members with regards to the matters that led to their deferral of the consideration of this planning application at the meeting of the Development Committee on 27th June 2025.

At the meeting on 27th June 2025 the agreed resolution was:

“The application be deferred, with the applicant given 28 days to submit any further information, with the application being considered by the Committee at its August meeting.”

Prior to that the matter had been considered (and deferred) at the Committee meeting on 6th February 2025.

Since then the application description has been revised, further information has been received and relevant consultees reconsulted.

This report should be read in conjunction with the Committee Report and the Development Committee Minutes from:

- (i) The meeting of 27th June 2025. These are included as **Appendices 1 and 2** to this report; and
- (ii) The meeting of 6th February 2025. These are included as **Appendices 3 and 4** of this report.

This report is being tabled to comply with the timing set out within the resolution of the June Committee.

UPDATE

A site meeting took place on 8th July 2025 involving Council Planning Officers, a ward councillor (Councillor Boyle), the applicant and his agent. Officers then issued a summary of the position to the applicant / agent on 16th July 2025.

Additional information was then received on 28th July 2025.

That information included:

- The revised description
- A statutory Biodiversity Metric Calculation
- A Biodiversity Net Gain Baseline Plan
- A Biodiversity Net Gain Proposed Plan
- A proposed Site Plan
- An Ecological Impact Assessment
- An Economic Statement
- A Heritage Impact Assessment
- An Undeveloped Coast statement.

In relation to the description change, the earlier version of the description was:

“Erection of 5 commercial units for uses within Use Classes E(c)(i) - financial services, E(g)(i) - offices, E(d) - indoor sport, recreation or fitness, B8 - storage or distribution.”

The changes are therefore:

- (i) Financial services, offices and indoor sport, recreation or fitness have been ‘taken out’ of the proposal; and
- (ii) Industrial process suitable for residential areas have been ‘added in’.

An analysis of the changes is included within the Officer Assessment section below.

CONSULTATIONS

Following the receipt of the revised information at the end of July 2025 the following internal teams at the Council have been (re)consulted:

- (i) Economic Growth
- (ii) Conservation
- (iii) Landscape / Ecology.

At the time of writing the Committee report, no responses have been received. It should be noted that the comment period had not expired at that stage.

Comments should though be received prior to the Committee meeting and will be reported orally. Whilst it is not considered that they are likely to result in a revised headline recommendation, it is possible that they might reduce the number of reasons officers consider the application should be refused for – and any revisions to the recommendation will be reported to and explained at Committee.

Following discussion with the applicant – at the meeting referred to above – it became clear that the intent of the scheme is focussed in large part on facilitating moves within Cromer of two existing companies. However neither of those fitted within the original description – but do fit within the revised description.

Officers have concluded that the description change does mean the proposal needs to be readvertised publicly – and all consultees be given a (further) chance to comment. Whilst that has commenced – the requisite period will not be concluded prior to Committee.

PREVIOUS OFFICER RECOMMENDATION

While the full reasons can be seen at the end of the last Committee report (**Appendix 1**), the ten reasons related to:

1. Conflict with 'Countryside' policies;
2. Potential detrimental impact on Cromer Town Centre;
3. Unjustified development in the 'Undeveloped Coast' area;
4. Impact on the setting of the Grade II Listed South Lodge;
5. The proposed access is considered unsatisfactory to serve the development by reason of its inadequate width; and,
6. The unclassified roads of Hall Road and Metton Road serving the site are inadequate to serve the development proposed, by reason of poor alignment, restricted width, lack of passing provision and restricted visibility at adjacent Road junctions.

In addition, 4 of the reasons related to 'insufficient information' having been provided. Those related to:

7. The sites ecological value and an inability therefore to assess potential adverse impacts upon habitats and protected species in accordance with the Council's statutory duties under Regulation 9 of the Conservation of Habitats and Species Regulations 2017 (as amended);
8. The site's Biodiversity Net Gain (BNG) baseline position;
9. The impact on mature trees adjoining the application site; and,
10. Surface water flooding risks.

OFFICER ASSESSMENT

This assessment looks at the 10 reasons set out above – and uses the same numbering system as above:

1. Development in the countryside

Policy SS2 of the Core Strategy states that:

“In areas designated as countryside development will be limited to that which requires a rural location and is for one or more of the following:

- *Agriculture*
- *extensions to existing businesses*

[and 15 other types that of development that aren’t relevant to this proposal]

Proposals that do not accord with the above will not be permitted.”

In this instance it is understood from the applicant that his intention is that the Hall Farm estate would occupy (at least) one of the proposed units (for agricultural related purposes) and that (at least) one of the other units would be occupied by an existing business on the wider Home Farm site (i.e. just to the west of the application site). Effectively therefore two units can be seen to be compliant with Policy and controllable within any approval that might be issued.

The other three units are a different matter. Whilst it has been suggested that Policy EC3 might cover these units, Council Officers do not agree with that view. That Policy says:

“Extensions to existing businesses in the countryside will be permitted where it is of a scale appropriate to the existing development and would not have a detrimental effect on the character of the area”

In Officers view existing businesses is not written in a manner that includes the over-arching business of a landowner expanding by them building new units for new businesses to operate from their land.

The consideration here is whether there are material considerations that justify these three units on this countryside site.

Policy E3 (Employment Development Outside of Employment Areas) of the Draft Local Plan is probably the most relevant Policy. The relevant part of the latest draft published in August 2025 states:

“1. New employment development outside of designated Employment Areas, Enterprise Zones, Employment Allocations or Mixed Use Allocations will only be permitted where it can be demonstrated that:

- (a) there is no suitable and available land on designated or allocated employment areas; or,*
- (b) there are specific reasons for the development not being located on designated or allocated employment areas, including, but not limited to:*

- (i) *the expansion of an existing business;*
 - (ii) *businesses that are based on agriculture, forestry or other industry where there are sustainability advantages to being located in close proximity to the market they serve;*
 - (iii) *industries and/or businesses which would be detrimental to local amenity if located in settlements, including on designated or allocated employment areas; and,*
- (c) *the development would not adversely affect highway safety”*

The applicant has submitted an Economic Statement that identifies two existing Cromer businesses who it is understood have a need to relocate due to the long-term availability of their existing site. Between them it states they employ 14 people and they both plan to increase their employment numbers over time.

The August draft of the Local Plan suggests that there are 6.37 hectares of ‘undeveloped employment land’ in the identified ‘Central Area’ with 1.92 hectares of that in Cromer and the rest in Holt (see draft Policy E1). The draft Plan doesn’t seek to make any new employment allocations in Cromer.

That 1.92 hectares is at the north end of Stonehill Way – off the A148 (Holt Road). The eastern part of that site has now been occupied by Coastal Gas Supplies Ltd. The remainder of the site is currently for rent on Rightmove as:

“Site 1 has an extensive concreted hard standing area of 1.87 acres (0.76 hectares) which is accessible at the end of Stonehill Way through secure double gates.

Site 2 (770 m²/0.19 acres) is a smaller site to the right hand side of Stonehill Way and is ideal for car parking or lightweight external storage. The footings are in for a temporary office building which could reinstate if required.”

The Arnold Keys brochure for the site is available at: [Stonehill Way Brochure](#)

It is therefore concluded that part (a) to (1) above is complied with in this case. Whilst it is recognised that it could be argued other employment land and sites outside Cromer – but within the Central Area - should be considered and discounted before non-employment sites are considered, that doesn’t seem to be a practical or appropriate proposition in this case.

Whether or not (1)(c) is complied with will be considered under points (5) and (6) below.

If, therefore, it is concluded that an employment use outside an employment area is acceptable here – and there is a strong economic argument in support of business retention and growth – then the next ‘question’ is ‘if not on an employment site, then where should these uses / business be’.

The ‘settlement boundary’ of Cromer is shown on page 177 of the latest draft Local Plan and is drawn tightly around the built up area with the exception of the three housing sites allocated on the edge of Cromer (none of which include employment provision within the allocation policy).

There are not thought to be any obvious sites these uses could go on – which then means a ‘countryside’ and an ‘undeveloped coast’ location are the only alternatives.

This isn’t an easy issue to balance – especially as the site isn’t immediately adjacent to the settlement boundary – but then it does have some existing employment buildings on the site already.

Regard should also be had to the National Planning Policy Framework – and paragraph 85 is probably most relevant:

“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development ...”

Paragraph 87 (c) also states

“Planning ... decisions should ... (make) provision for: ...

- c) the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience.”*

To conclude on this matter, the proposal is contrary to Development Plan Policy. However, the need to accommodate the sorts of uses proposed in the Cromer area is considered to be a material consideration to which weight can be afforded and the absence of policy compliant alternatives increases the weight that can be afforded by the decision maker to this issue. The conflict with the Development Plan and the material considerations in favour will be weighed in the planning balance.

2. Impact on Cromer Town Centre

The revised description removes the uses that caused the concern about the potential impact on Cromer Town Centre. Therefore, the change means that that ‘reason’ effectively falls away and the conflict with Development Plan Policy SS 5 no longer arises.

3. Development in the “Undeveloped Coast”

Officers note that, save for the 1.92 hectares of land at the north end of Stonehill Way, most if not all other potential locations for commercial development around Cromer would be sited within the defined “Undeveloped Coast” under Core Strategy Policy EN 3.

In the event that the Development Committee conclude that the material considerations in support of development in the countryside on the fringes of Cromer – i.e. reason (1) above – are considered to attract sufficient weight in favour, then these may also act as a material consideration to justify departure from Development Plan policy EC 3 absent reasonable alternative sites.

The conflict with the Development Plan and the material considerations in favour will be weighed in the planning balance. However, if the economic case isn't considered made then this reason for refusal should remain.

4. Impact on Heritage Assets

The previous reports have recognised that the heritage harm from this proposal is at the 'less than substantial' end of the impact spectrum – and that whilst the harm would be weighed against public benefits of the proposal, Officers previously concluded that the public benefits had not been justified.

Having considered the matter carefully, Officers recognise that if an economic case justifying the development in the 'Countryside' is made – then the need for economic premises to safeguard jobs and provide additional employment and spend within the town would be capable of being material considerations that could attract positive weight and could be considered enough to outweigh the heritage harm in this case. However, if the economic case isn't considered made then this reason for refusal should remain.

5&6. Highway Safety

The latest submission from the Norfolk County Council (as highways authority) states:

“ ... the Highway Authority concerns are as follows:

- a) Suitability of Hall Road to support intensification at the Home Farm commercial area.*
- b) Visibility from the access*
- c) Layout of the access.*

As you will be aware, Hall Road / Metton Road typically have a poor alignment and restricted width. They do however benefit from a recently implemented 30mph speed limit. The applicant has not sought to mitigate their impact at the route but it does seem unlikely that a meaningful improvement could reasonably be secured.

In terms of b) and c), there would seem to be scope to improve the access.

I understand there might be scope to provide improved visibility from the access. In the absence of a vehicle speed survey, I would suggest that 85%iles are likely to be in the region of 35mph at this location. Accordingly would suggest the visibility splays of 2.4m by 54m are sought in both directions.

The Highway Authority would generally limit radii at commercial accesses to 12m. The existing radii appear larger than would normally be supported but considering the reduced road width, they may help enable access by larger vehicles. The revised layout should be informed by vehicle swept-path analysis and the access radii constrained so far as possible.

The access layout is complicated slightly by the presence of the Home Farm Lodge access. I would highlight that the proposal seems to rely on using the adjacent access to accommodate waiting vehicles. I would suggest that to suitably accommodate two opposing vehicles at the access, it should be widened to 6.5m for a distance of 15m back from Hall Road.

Whilst acknowledging the constrained nature of the local network, it is accepted that the commercial area is existing. Improved visibility splays and access as above, would to an extent ameliorate the Highway Authority concern.

If the Planning Authority minded to approve the application, the Highway Authority would request inclusion of [five] conditions ...”

That was a softening of their position, which up to then was recommendation of refusal for the following two grounds:

- (i) The access is unsatisfactory to serve the proposed development by reason of its inadequate width and the proposal would therefore lead to the stopping and waiting of vehicles on the highway to the detriment of highway safety. Contrary to Policy CT5; and,*
- (ii) The unclassified roads of Hall Road and Metton Road to the west serving the site is considered to be inadequate to serve the development proposed, by reason of poor alignment / restricted width / lack of passing provision and restricted visibility at adjacent Road junctions. The proposal, if permitted, would be likely to give rise to conditions detrimental to highway safety. Contrary to Policy CT5.*

For the avoidance of doubt, it is considered that the Highway Authority are still ‘objecting’ to the proposal but providing some ‘what if’ suggestions alongside that – with an awareness of the discussion at the February Committee meeting in the background to their June comments.

The conditions that the County Council refer to (see their response dated 24th June 2025), would mean extensive works would be required on access widening and visibility splays which raise some concerns about the impact of any such works on the setting of the listed building (i.e. reason 4) and the impact on trees and hedgerows around the junction.

While the applicant’s agent has asserted that no tree or hedge tree / plant will need to be removed as part of this scheme, it is not clear how the access works can be done in keeping with the conditions advocated by Highway Authority.

Further consideration to this will be given upon receipt of the comments from the Council’s landscape team.

7. Ecology

The awaited consultation response from the Council’s Ecologist should – when received – enable a re-appraisal of this ground. The Committee will be provided with a verbal update on this matter.

8. Biodiversity Net Gain

The awaited consultation response from the Council's Ecologist should – when received – enable a re-appraisal of this ground. The Committee will be provided with a verbal update on this matter.

9. Impact on Trees

The awaited consultation response from the Council's landscape team should – when received – enable a re-appraisal of this ground. Central to this will be the impacts around the junction onto Hall Road. The Committee will be provided with a verbal update on this matter.

10. Surface Water Flood Risk

Very little additional information has been received on surface water flooding – and it remains relevant that parts of the site are within a recognised 'surface water flooding zone'. Absent the requested information then this reason for refusal would remain.

In the event that the Development Committee afford weight to the economic case for the proposal and wish to support the development, Officers will give further thought as to whether a 'before development commences' type condition could control the matter adequately.

PLANNING BALANCE / CONCLUSIONS

Officers consider that the further information and the revised description received in July 2025 have strengthened the proposal and made it more Policy compliant.

Nonetheless the proposal would still represent a departure from the Development Plan. However, if the Development Committee are persuaded by the primary material consideration in favour – i.e. the economic case - and conclude that significant weight should be afforded to that matter, then it could be argued that there are sufficient material considerations to outweigh the identified departure from the Development Plan.

However, irrespective of any economic case, Officers note that not all of the reasons for refusal recommended to Committee in June have been overcome.

Four core elements of concern remain:

- (i) The highways concerns (reasons 5 and 6 above);
- (ii) Whether the submitted ecological report provides the assurance required to overcome reason 7;
- (iii) The impact on trees (and hedgerows in the area) – an in particular around the access point (reason 9) above;
- (iv) The lack of information on surface water flood risk (reason 10).

This is the third time this application is being reported to Committee – and while there are some matters outstanding at the time of writing – and public consultation period will still be

running at Committee – Officers are of the view that there will be enough information for the Committee to reach a decision at Committee.

Fundamentally though Officers remain of the view that the application should still be refused – although for a smaller group of reasons than before.

RECOMMENDATION:

To authorise the Assistant Director – Planning to **REFUSE** permission upon conclusion of the (re)advertisement / (re)consultation period associated with the revised description – unless comments received materially change the position – for the following reasons:

- (i) Highways matters (reasons 5 and 6 above)
- (ii) Surface Water flooding matters (reason 10 above).

The wording of those three reasons would be as previously suggested:

1. The proposed access is considered unsatisfactory to serve the development by reason of its inadequate width. The proposals would therefore lead to the stopping and waiting of vehicles on the highway to the detriment of highway safety contrary to Policy CT 5 of the adopted North Norfolk Core Strategy and Chapter 9 of the National Planning Policy Framework.
2. The unclassified roads of Hall Road and Metton Road serving the site are inadequate to serve the development proposed, by reason of poor alignment, restricted width, lack of passing provision and restricted visibility at adjacent Road junctions. Consequently, as a result of the additional traffic generated by the development, the proposals would be likely to give rise to conditions detrimental to highway safety contrary to Policy CT 5 of the adopted North Norfolk Core Strategy and Chapter 9 of the National Planning Policy Framework.
3. Insufficient information has been provided by the applicant in order to demonstrate that the proposal would not be at risk itself from, or give rise to, surface water flooding elsewhere. The application has not provided sufficient information to demonstrate this development would/could incorporate an appropriate sustainable drainage system. The proposal is therefore contrary to Policy EN 10 of the adopted North Norfolk Core Strategy, paragraphs 181 and 182 of the National Planning Policy Framework and the guidance contained within the Government's Planning Practice Guidance in relation to Flood Risk.

And, depending on the outcome of the (re)consultation responses that will be reported to Committee:

- (iii) Ecological matters (reason 7 above)
- (iv) Tree and hedgerow matters (reason 9 above).

In each of those cases the wording is likely – if recommended – to be updated from the June 2025 wording (at **Appendix 1**).