

HEMPTON – PF/25/0961 - Self-storage facility with 212 containers, perimeter fencing, landscaping, and associated works at Land South of Hempton Poultry Farm, Helhoughton Road, Hempton, Norfolk

Minor Development

Target Date: 18 July 2025

Extension of Time: 15 December 2025

Case Officer: Mark Brands

Full Planning Permission

RELEVANT SITE CONSTRAINTS

Located within the countryside

Landscape Character Assessment - Tributary Farmland

Landfill Gas Site

Nutrient Neutrality catchment

Section 106 Planning Obligations

GIRAMS Zones of Influence (various)

RELEVANT PLANNING HISTORY (land associated with poultry unit)

Ref: PF/24/1295

Description Installation of CO2 Liquefaction Recovery Equipment

Outcome Approved 11.09.2024

Ref: PA/23/1279

Description Installation of an 880kWp AC roof-mounted solar PV array on the Hempton Poultry sheds, to generate electricity for consumption at the AD plant.

Outcome Approved 08.08.2023

Ref: CL/19/1776

Description Certificate of Existing Lawful Development for layout and design changes at Raynham AD plant site

Outcome Was lawful use

Ref: PF/04/1006

Description Erection of two two-storey dwellings and garages in connection with agriculture

Outcome Approved 26.01.2005

Ref: PF/99/0109

Description Erection of poultry unit

Outcome Approved 27.09.2001

THE APPLICATION

Seeks the creation of an outdoor storage facility for 212 self-storage containers (Use Class B8), including 2.4m high perimeter fencing, CCTV, landscaping, external lighting and associated works.

There would be 212 containers, comprising a mix of the below

- 4no. 40ft containers (dimensions 12.19m x 2.44m)
- 144no. 20ft containers (dimensions 6.06mx 2.44m)
- 64no. 10ft containers (dimensions 3.05m x 2.44m)

The external appearance of the containers would be metal clad in a dark green colour. The facility would be accessible from 7am-9pm 365 days a year. The site would be accessed via a secure gate operated by a gate code.

The application site comprises a triangular grassland plot measuring 0.74 ha. There are established mature hedgerows on the roadside to the south and to the west and east of the application site in excess of 2m in height. This largely screens the site from the public highway and public footpath to the west of the site connecting Hempton Road with Shereford Road. There is a parallel bund to the north in excess of 2m separating the site from the rest of the poultry site with the poultry sheds on the other side of this, and the anaerobic digestion plant further to the north of the sheds.

Further details received during the application

19 November Addendum Planning Statement.

18 September Supporting letter received on behalf of the applicants (Vantastic Movers)

6 August email correspondence from the agent on additional details and justification

REASONS FOR REFERRAL TO COMMITTEE

Called in by the Development Manager for the following reason(s): - To enable the Development Committee to have oversight on the correct application of relevant planning policy given a difference of opinion between the applicant/agent and Officers on the interpretation of relevant policy applicable to the proposal including Core Strategy Policy EC 3.

PARISH/TOWN COUNCIL

No comments received

CONSULTATIONS

Landscape (NNDC) (ecology) - No Objection (subject to conditions) – appropriate mitigation and enhancement measures have been set out in the Ecological Impact Assessment, with BNG to be provided offsite.

Norfolk County Council Highways – No objection

Norfolk Fire Rescue Service – Comments – requirement of fire hydrant

REPRESENTATIONS

No third-party representations received, 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

The application raises no significant crime and disorder issues.

EQUALITY AND DIVERSITY ISSUES

The application raises no significant equality and diversity 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 (adopted September 2008)

SS 1 - Spatial Strategy for North Norfolk

SS 2 - Development in the Countryside

SS 4 - Environment

SS 5 - Economy

EN 2 - Protection and Enhancement of Landscape and Settlement Character

EN 4 - Design

EN 9 - Biodiversity & Geology

EC 1 - Farm Diversification

CT 5 - The Transport Impact of New Development

CT 6 - Parking Provision

Material Considerations:

National Planning Policy Framework (NPPF):

Chapter 2 - Achieving sustainable development

Chapter 4 - Decision-making

Chapter 8 - Promoting healthy and safe communities

Chapter 12 - Achieving well-designed places

Chapter 15 - Conserving and enhancing the natural environment

North Norfolk Emerging Local Plan

The emerging North Norfolk Local plan has reached the **Main Modifications** stage following examination by the Planning Inspectorate. Public consultation on the modifications was undertaken during August and September 2025, and the Inspector's final report is pending. Adoption is currently anticipated November / December 2025.

Application of NPPF Paragraph 49

In accordance with Paragraph 49 of the National Planning Policy Framework (NPPF), weight may be given to policies in emerging plans based on:

1. **Stage of Preparation** - *The more advanced its preparation, the greater the weight that may be given.* The plan is at an advanced stage in the examination which supports giving **moderate weight to its policies**
2. **Extent of Unresolved Objections** - *The less significant the unresolved objections, the greater the weight that may be given.*
 - If there are major unresolved objections, especially to policies relevant to the application, the weight is reduced.
 - If objections are minor or resolved, more weight can be given.

There are no significant unresolved objections and therefore **SIGNIFICANT** weight may be afforded to the following relevant Emerging Local Plan Policies:

CC 1 - Delivering Climate Resilient Sustainable Growth
CC 3 - Sustainable Construction, Energy Efficiency & Carbon Reduction
CC8 – Electric Flood Risk
CC 9 - Sustainable transport
CC 10 - BNG
CC 12 - Trees, Hedgerows & woodland
CC 13 - Protecting Environmental Quality
SS 1 – Spatial Strategy (Except Small Growth Villages which is apportioned no weight)
SS 2 - Development in the Countryside
HC 7 - Parking Provision
ENV 2 - Protection & Enhancement of Landscape & Settlement Character
ENV 4 - Biodiversity & Geodiversity
ENV 6 - Protection of Amenity
ENV 8 - High Quality Design
E 1 - Employment Land
E 2 - Employment Areas, Enterprise Zones & Former Airbases
E 3 - Employment Development Outside of Employment Areas

3. **Consistency with the NPPF** - *The closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given.* The overall Plan as modified is considered to be consistent with national policy. **This supports giving greater weight to the policies identified above.**

Conclusion on Weight

The Plan has been found legally compliant and capable of being found sound and is in conformity with the NPPF. Having reached main modification stage, the Plan, as modified, remains a material consideration. The examination is still ongoing, and some objections remain unresolved / unknown, and as such, there remains the potential for further alterations prior to the issuing of the Inspectors final report and prior to adoption by the Council.

Taking into account the above factors, it is considered appropriate to give limited, significant weight in particular to policies E2 and E3 as set out above of the emerging Local Plan (as modified) in the determination of this application.

OFFICER ASSESSMENT

Main issues for consideration:

1. Principle of Development

2. **Impact on Landscape and Character of the Area**
3. **Design**
4. **Amenity**
5. **Lighting**
6. **Highways**
7. **Biodiversity**

1. Principle of Development

Core Strategy Policy SS 1 sets out the Council's spatial strategy for development within the district. It seeks to focus the majority of new development within towns and larger villages as designated in the settlement hierarchy as these are the most sustainable locations. Fakenham is designated as a principal settlement within this, located around 1.5 miles to the northeast.

Core Strategy Policy SS 2 permits certain types of development within the countryside (including for agriculture, extensions to existing businesses, new build employment generating proposals where there is operational justification etc), however, as the proposed development would not fall under any of those categories listed, the application site is not in a location where the new development proposed would be permitted under Core Strategy policy.

This is consistent with other decisions that included self-storage containers in the district including an appeal (APP/Y2620/W/19/3239241) at Sustead. While of a smaller scale and in a more isolated location than the current application, Officers consider the interpretation planning policy is applicable to this site and sets a precedent for consideration of such cases.

See extract below of paragraphs 9 and 10 of the appeal decision.

9. *Policy SS2 states that in the countryside development will be limited to that which requires a rural location and is for (amongst other things) extensions to existing businesses, new-build employment generating proposals where there is particular environmental or operational justification, and the re-use and adaptation of buildings for appropriate purposes. Proposals that do not accord with the requirements will not be permitted. The development is not for an existing business. There is no environmental or operational justification advanced for the development needing to be in this location. The existing site buildings are not proposed to be adapted or reused, with a number of new containers proposed. Therefore, the development does not accord with Policy SS2.*

10. *For the reasons set out above the proposed development would conflict with and result in significant harm having regard to Policies SS1 and SS2 of the NNCS. These policies seek to protect and restrict new development in the countryside, and direct new development to the most sustainable locations in accordance with the spatial strategy.*

Policy SS 5 supports the rural economy and farm diversification, including extensions to existing businesses of an appropriate scale and re-use of existing buildings, including appropriate re-use of the operational land at redundant defence establishments.

Policy EC 1 permits development for the purposes of farm diversification provided that it can be demonstrated that the proposals would make an ongoing contribution to sustaining the enterprise as a whole and would not involve new build.

Policy EC 3 supports extensions to existing businesses in the countryside “where it is of scale appropriate to the existing development and would not have a detrimental effect on the character of the area”. Officers consider that Policy EC 3 is not applicable to this application as the container storage facility is a new development and not an extension to an existing storage facility / business.

It is also noted that the NPPF promotes the rural economy. Reference has been made by the applicant to paragraphs 88 and 89 that set out planning decisions should enable the growth and expansion of all types of business in rural area, and the development and diversification of land based rural businesses. The NPPF also sets out that sites to meet local business and community needs may have to be found adjacent to or beyond existing settlements, and in locations not well served by public transport. In these circumstances it will be important to ensure that the development is sensitive to its surroundings and does not have an unacceptable impact on local roads. The use of previously developed land, and sites physically well-related to existing settlements should be encouraged where suitable opportunities exist.

Following concerns raised by the officers, additional details and justification for the proposal were provided. The applicant added further reference to policy EC 3 concerning the holdings of the wider Raynham Estate covering some 2,000 hectares. The applicant suggests that any development proposals put forward by the applicant (as Raynham Estate related businesses) would accord with this policy as they would support the wider estate business. Officers fundamentally disagree with this interpretation; the proposals appear to have no functional relationship or association with the wider use of the site. The application site is based around the poultry unit. This is very much a standalone new development which does not form an extension to an existing building or business.

Even in the event that Officers were persuaded by the applicant’s interpretation of Policy EC 3 regarding a wider estate business case, then there is no agreed estate management plan in place to support or corroborate the wider estate aspirations for diversification. Finally, even if the above elements were agreed and in place then officers can see no mechanism which ties the proposals to the wider estate and binds the benefits arising from the proposal into supporting the wider estate strategy.

Reference has been made to another application on the Raynham Estate (ref: PF/23/2219 for conversion of agricultural barns to a distillery, and ancillary commercial uses). Officers consider this application was a materially different scheme for conversion of existing buildings which are heritage assets at East Raynham. The officer’s report on PF/23/2219 should be viewed as a whole. It is clear that there was significant policy compliance which outweighed any policy conflict in the planning balance. The proposals in that instance would reuse buildings associated with the principal heritage asset along with significant economic benefits to employment, and securing the long-term future of the two successful local independent businesses. These factors outweighed any lack of compliance. However, officers agree that specific reference to associations with the wider Raynham Estate is made within the body of the officer report:

“the Estate as a whole is considered as an ‘existing business’, given it’s significant economic and employment input and support to the area and local economy, through the purposes listed and being the custodian to a number of heritage assets including the Grade I listed Raynham Hall. The proposed development could therefore be considered as an extension to the existing business of Raynham Estate as a whole – and therefore is compatible with Policy EC 3 ...”

However, Officers consider the context of this reference is chiefly in terms of conserving the heritage assets within the wider estate and associated benefits arising from re use of the

vacant heritage asset at East Raynham. In any event this interpretation is not considered determinative, as explained above the East Raynham proposals were otherwise policy compliant and carried a positive planning balance.

Officers consider the current proposals are not policy compliant and are not demonstrably similar to proposals under app ref: PF/23/2219 e.g. they do not present reuse of a heritage asset or demonstrably enable retention of established local businesses. There is no positive planning balance. The applicant appears to be seeking to establish a favourable policy precedent for ad hoc new business uses in unsustainable locations on the Raynham Estate, where none currently exists.

Self-storage is not considered to be an acceptable 'land based rural business'. The Framework does not provide a definition for this term, but it is logical to consider this category as encompassing land uses that require or receive a specific advantage from a rural setting. Examples of such uses may include equine stabling and outdoor recreational activities. However, this category does not extend to include self-storage units, as it can also be accommodated more sustainably on an industrial or urban sites. Even if it is accepted that self-storage is a suitable form of farm diversification, the use is unlikely to generate significant additional employment, and will only benefit the applicants as opposed to benefiting the wider local rural economy. As noted above, the applicant has failed to provide any substantive evidence or supporting information detailing how this would support or diversify the estate as a whole or how the income from the operation would be used to support heritage assets under its ownership.

Additionally, given the nature of the proposal, users are expected to travel to and from the site by private vehicle rather than public transport and therefore, the proposal runs contrary to the Framework's aim to promote sustainable development.

The applicants were requested to demonstrate the strategic need for such a business in this location. An email has been provided from a removals company based at West Raynham setting out they struggle to find storage locally. Although this carries some limited weight, the proposals are considered to be deficient in providing compelling evidence of a strategic need for self-storage and demonstrating why the use is required to be at such a scale of operation. The proposals fail to demonstrate any substantive scale of unmet demand or a persuasive locational imperative for the new business.

Officers consider that there could be sequentially more appropriate sites, which are better related to existing settlements in more sustainable locations. Fakenham has a designated Employment Area, with a similar facility off Wymans Way. As a designated employment area this land is not inherently unsuitable for self-storage businesses (on the proviso that there is vacant land). Following planning approval under PF/21/0065 The Wymans Way facility has expanded, to now be of a similar scale to that proposed at Hempton. Furthermore, the approved site plan for Wymans Way shows land adjacent (in the same ownership). Officers consider that if there was further unmet demand for self-storage that such demand could be met by this underutilised land. As such without substantive information detailing local demand, identification of suitable local sites, use of existing sites and occupancy of the self-storage units then there is limited evidence to support a departure from planning policies. Particularly so when considering the support required for a new business of such a large scale as proposed at Hempton.

Even if such a need was to be evidenced, there is an existing business operating which has the ability to expand and to satisfy local demand in a more sustainable location. Without any substantive information to the contrary, the proposals appear speculative and will undermine the strategic policies in the local plan that direct such uses to more sustainable locations.

Overall, the submission lacks adequate information to demonstrate the sustainability and economic advantages of the proposal to the estate business or the broader economy as required by policy EC1 (should this policy be considered to apply for the avoidance of doubt), therefore, the proposed development is considered to be contrary to policy SS1, SS2 and EC1 of the Core Strategy. As set out policy EC 3 is not considered to apply to this case because the proposal does not relate to an extension to an existing business in the countryside.

Regarding the emerging local plan for which significant weight may be afforded to employment policies E2 and E3. Policy E2 sets out that within Employment Areas, uses including B8 would be permitted, provided the outlined criteria is met. This confirms that Self storage uses are compatible with such designations.

Policy E3 sets out that new employment outside of designated Employment Areas will only be permitted where it can be demonstrated that there is no suitable and available land on designated or allocated employment areas and there are specific reasons for the development not being located in such designations.

As previously set out there is no persuasive sequential assessment of sites or justification to the site selection within the application. The preeminent reason given appears to be that the application site is in the ownership of the Raynham Estate and would be of a limited private economic benefit.

As set out above, there is a self-storage business in operation within the allocated employment area at Fakenham which has land available for expansion. The applicants rule this site out as it is not within their ownership and would not be of direct benefit to them. However, the policy does not consider site ownership, simply that there is land available for the proposed use in a more sequentially appropriate location. There is no substantive evidence of capacity issues of such self-storage in the locality or substantive unmet demand. There is no persuasive policy reason for the development to be sited as proposed. It does not expand an existing self-storage business, the development itself is not based on agriculture or other rural land-based activities or specific spatial justification for the location of the self-storage business in this location.

The proposals are therefore also considered contrary to emerging policy E3.

Overall, in terms of the principle, the proposal amounts to a departure from the Development Plan which weighs very heavily against the grant of planning permission unless there are substantive material considerations to justify a departure from the Development Plan. None have been provided which could attract sufficient weight to outweigh the departure.

2. Highways

Policy CT 5 requires development to provide safe and convenient access for all modes of transport, including access to the highway network. Policy CT 6 requires new development to have sufficient parking facilities. Paragraph 116 of the NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

The site would utilise the existing access serving the poultry unit, accessible via Hempton Road leading from the A1065. The details have been reviewed by the Highway Authority who raise no objections on the basis that the proposal is conditioned for self-storage purposes only. The proposals are not considered to give rise to unacceptable impacts on highway safety or result in residual cumulative impacts on the road network that would be severe, with sufficient access and visibility arrangements for the proposed development.

The proposal would therefore accord with relevant Development Plan policy and emerging policy.

3. Design

Policy EN 2 seeks, amongst other matters, to ensure that development be informed by, and is sympathetic to, the distinctive character areas identified in the North Norfolk Landscape Character Assessment. 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, distinctive settlement character and the setting of, and views from, Conservation Areas

Core Strategy Policy EN 4 states that all development will be of a high-quality design and reinforce local distinctiveness. Design which fails to have regard to local context and does not preserve or enhance the character and quality of an area will not be acceptable. In this case the proposal is of a good visual design, demonstrating a good understanding of the context of the building and site and respecting its character.

The site is relatively well contained given the existing hedging around the site largely screening this from the wider public domain. The containers would also be dark green so should be relatively discrete from any intervening views. It is also noted the backdrop is somewhat utilitarian / industrialised with the large poultry sheds to the north and recycling centre and reclamation business further east.

Given this context, the largely screened and contained nature of the site, low scale form of development and utilisation of the existing access, the proposals are considered not to raise design or landscaping concerns nor would they adversely impact the surrounding landscape characteristics. Additionally, given the site is well contained and not in proximity of residential amenity, there are no concerns over amenity impacts from the proposals. The proposals are considered to accord with policies EN 2 and EN 4.

4. Ecology

The application is accompanied by an Ecological Impact Assessment. Priority Habitats were identified on the site including native hedgerow. All native hedgerow is proposed to be retained as part of the development. Compensation will be required for the loss of modified grassland and bramble scrub on site in order to achieve the mandatory minimum of 10% Biodiversity Net Gain (BNG).

Precautionary working methods are proposed for foraging and commuting bats, nesting birds and reptiles which may potentially be impacted during construction and operation of the Site.

A bird survey has not been undertaken to inform the ecological assessment. However the rough grassland on site has the potential to support foraging barn owl, as well as other birds such as kestrel (amber listed). It is proposed that modified grassland will be replaced offsite by the applicant as part of BNG, and therefore it is recommended that this is managed as rough grassland to support these important birds species.

The proposals do not raise significant ecological concerns subject to conditions to secure measures to be in accordance with the mitigation and enhancement measures, a construction environmental management plan and a landscaping and ecological management plan

Compensation for the loss of modified grassland and bramble scrub on site will be required in order to achieve the mandatory minimum BNG of 10%. The Metric calculation tool requires the delivery of at least 4.27 Habitat Units and 0.07 Hedgerow Units to achieve 10% net gain. This is proposed to be delivered off-site on other land within the applicant's ownership, details of this would be required and secured post determination. Subject to conditions and satisfying the BNG statutory requirements, the proposals are considered to accord with policy EN 9.

5. Planning balance and conclusion

The proposed development would result in a substantial Self-Storage use in a countryside location. The use is purported to be related to an existing agricultural enterprise and ongoing viability and economic benefits to the wider Raynham Estate/ wider rural economy.

For the reasons given above the proposed development would result in a use that is not considered acceptable or appropriate for a countryside location. As set out the supporting information fails to provide substantive justification or evidence for the proposals in terms of the scale of business and any effective mechanisms linking the benefits arising to the wider estate. There are no agreed estate management plans or financial details to support the application. The proposals are contrary to the adopted local plan and would also conflict with emerging policies as set out above. The principle is not supported and the limited unsecured benefits from the proposals are considered not to outweigh this policy conflict. It is therefore recommended that this application be refused.

RECOMMENDATION:

REFUSE for the following reason:

The proposal is for the creation of a new self-storage container business (212 units) on land associated with the poultry unit. The proposals are not considered to form an extension to an existing business and are located in an unsustainable countryside location. Such uses are directed towards existing settlements and employment areas, and there is insufficient supporting details or financial details setting out operational justification including how this assists in supporting the estate as a whole to depart from these spatial policies or business case to justify such a large scale of operation as a new business. The proposals are considered contrary to policies SS 1, SS 2, EC 1 of the adopted Core Strategy and emerging policies SS 1, SS 2, E 3 of The North Norfolk Local Plan 2024-2040.

Final wording to be delegated to the Assistant Director for Planning