

HOLT – PF/24/2530 – Erection of 23 dwellings (including 7 no. affordable dwellings) with associated parking, landscaping and creation of public open space at Land north of Valley Lane, Holt, Norfolk

Major Development

Target Date: 28 February 2025

Extension of Time: 28 February 2025

Case Officer: Mark Brands

Full Planning Permission

RELEVANT CONSTRAINTS

Agricultural Land Classification: Grade 2

Archaeological Notification Areas

Conservation Areas – Holt and Glaven Valley

Landscape Character Assessment - River Valleys and Wooded Glacial Ridge

Listed Buildings in vicinity

Principal Routes

Within Holt settlement boundary

Holt Neighbourhood Plan Area

Mineral Safeguarding Area

GIRAMS Zones of Influence (various)

THE APPLICATION

Seeks planning permission for the erection of 23 dwellings, comprising four x 1 bed, one 2 bed, thirteen x 3 bed and five x 4 bed. The development comprises 7 affordable (units 17-23) and 16 market dwellings (units 1-16). The units are mostly two storeys in a mix of detached, link and semi-detached terrace and apartment block, and 1-unit single storey dwelling.

The main area of open space is on the western boundary of the site, with pockets of open space and landscaping also in the centre of the site east to west axis, and buffer strips to the south and north and northeast of the site.

The site is accessed via Pound Close (comprising a small housing “Close” to either side) this in turn joins Norwich Road (A148). The site is adjacent to predominantly detached residential properties to the east and south; a property and garden abutting the site to the north. To the west and northwest is countryside and Spouts Hill County Wildlife Site. The site area is 0.94 hectares, with 1,492sqm of public open space proposed predominantly on the western side of the site.

An Environmental Impact Assessment (EIA) Screening Opinion was completed by the Council, dated 23 January 2025, this concluded that the proposal would not likely have significant effects on the environment in EIA terms. The decision concluded that an Environmental Statement was not required to be submitted with the application.

Further details / amendments received during the course of the application

- 7, 9 and 19 January 2026 Following the adoption of the new Local Plan, updated plans and reports have been provided to reflect new policy considerations and requirements, levels details and BNG calcs.

- 9 December 2025 details on private footpath and land transfer and shadow castings
- 18 November 2025 Updated site plan received to address highway comments
- 14 November 2025 Shadow Casting neighbouring view plans, plot plans, indicative sketch plans and frontage site sections
- 17 October 2025 planning statement and indicative sketch drawings
- 25 September 2025 Full package of revised plans received for plots, covering letter, reports and supporting details received

Since the submission of the original plans, the proposals have been subject to a significant redesign and full set of new plans submitted. The summary of consultee comments reflects the revised proposals. The public comments summary is based on the representations received during the course of the application, noting the similarities and references made to the earlier comments submitted in the public comments.

RELEVANT PLANNING HISTORY

Reference	PF/23/0537
Description	Hybrid application comprising a Full Planning Application for 15 dwellings along with vehicular and pedestrian access, services/utilities infrastructure through the site, and an Outline Application (all matters reserved apart from access) for seven 'self-build' dwellings
Outcome	Withdrawn

REASONS FOR REFERRAL TO COMMITTEE

Local member: the application has been referred to committee at the request of Councillor Rouse for the following reasons:

I have serious concerns along with several local residents about the displacement of local wildlife and ecology related to this proposal, I feel this contradicts commons law to strictly prohibit building on Conservation Land and feel approval of this proposal would in such be extremely controversial, as well as this there are concerns of the local residents that would feel overlooked by this development and the infringement upon their own properties, increased influx of traffic we feel would also be a significant issue as the junction around Valley Lane is already very busy with any potential development risking further congestion and traffic issues.

I do really feel that this development would not be wise and that the committee should be made fully aware of the objections.

CONSULTATIONS

Holt Town Council – Support (summarised – full comments on public site)

- Developer has offered the lower field as an extension to Spout Hills and seek its inclusion in the S106 with HTC provided money with the intention to open up some of this land for public access.
- Its an allocated site
- Maximum amount of affordable housing should be delivered and preference to increasing the amount currently offered
- Recognise the efforts made in the revised plans to address concerns raised by nearby residents

- Maintenance of buffer zones to be maintained by a maintenance company
- Note the additional parcel of open space being offered to the community and provided this is included in the S106 HTC support application.

Anglian Water – Comments – (subject to informatics, local infrastructure has sufficient capacity to accommodate the development)

Landscape (NNDC) – Comments

- Revised plans present a more appropriate orientation of units that satisfactorily addresses previous concerns in relation to landscape and visual impact.
- Views through the site to Spout Hills and the countryside beyond are retained.
- Landscape buffers at site boundaries are improved and there is pedestrian linkage from the site to Spout Hills.
- Site lies east of Spout Common County Wildlife Site.
- A financial contribution to Norfolk Wildlife Trust appropriate
- Support revised layout to include wildlife corridors on northern, western and partially on southern boundary and reduction of height and associated light spill
- Bats use western and southern boundary for foraging and commuting between roosts and feeding sites
- Proposed BNG / slow worm translocation site managed as rough grassland would provide alternative foraging for barn owl following loss of grassland site
- GIRAMS contribution required
- Translocation site required to be enhanced prior to translocation of slow worms
- BNG – further information required

Environmental Health – No objections – (subject to conditions including contamination in the event this is encountered, details of plant/machinery/ventilation/air con/heating equipment)

Natural England – Comments

- Further information required regarding impacts on designated sites (GIRAMS)
- Impacts on landscape do not necessitate Natural England involvement

Climate and Environmental Policy – Comments

- No energy statement setting out how its meeting sustainable construction and energy efficiency
- Recommend building the houses to be net zero

Norfolk County Council Flood & Water Management (LLFA) – No objection (subject to conditions) –

- Objected to original details based on insufficient information and details expected at the full application stage
- a sensitivity check is required to ensure strategy and calculations continue to comply with latest version of all relevant policies and guidance
- Details incorporate rain garden features for 8 plots
- No Construction Water Management Plan has been provided that clearly assesses and demonstrates safe management of local flood risk and surface water runoff drainage throughout the proposed construction phase. However, due to this application being submitted prior to this requirement being included in the Norfolk LLFA's Guidance for Developers document, in this instance the LLFA are willing to provide a condition for this information
- Proposals include individual soakaways and permeable paving where the maintenance and management responsibilities will be the responsibility of future occupants and this needs to be ensured.

Norfolk County Council - Planning Obligations Co-Ordinator – Comments (outlining contribution requirements)

Norfolk County Council Highways – No objections (subject to conditions)

Norfolk Fire and Rescue Service – No objections (subject to provision of 1 fire hydrant)

Planning Policy (NNDC) – Comments – Outlines the background to the allocation of the site and associated consultations, context of the site and policy positions and expectation of adherence to allocation policy

Strategic Housing NNDC – Support – On balance, broad policy compliance level of affordable homes (with the inclusion of a commuted sum).

Norfolk Minerals and Waste - No objections – site is underlain by a Mineral Safeguarding Area (Sand and Gravel), it is considered that as a result of the site area it would be exempt from the requirements of the adopted Norfolk Minerals and Waste Core Strategy

Norfolk Wildlife Trust – Comments

- Site is adjacent to Spout Common County Wildlife Site (CWS), noted for 'lowland fen' habitat (priority habitat). Concerned about negative impacts on this CWS, particularly from visitor pressure and light spill
- concerns about the cumulative negative impacts on Spout Common CWS as a result of increased footfall on the site from coded boundary gate.
- recommend a contribution is provided from the developer towards the management of Spout Common CWS, in order to mitigate against the cumulative impacts of visitor pressure (including through the provision of signage, interpretation panels or infrastructure etc)
- welcome revised site plan reducing number of floors and all buildings would be lower, which would reduce light spill
- Mitigation and enhancement measures outlined in report should be conditioned

Norfolk Constabulary – Designing Out Crime Officer – Comments

- Information on role in relation to providing advice in relation to layout, environmental design and physical security of buildings, based upon principles of crime prevention through environmental design.
- Concerns over blank elevations in between homes 3 and 4 and a common bungalow design which places the active elevations into the private rear garden space
- Boundary treatment suggestions
- Unobserved parts of the site
- Suggested changes include all homes having private footpaths to their entrance doors and clearly define private spaces rather than public/communal approach
- Vulnerability to rear gardens due to slightly low boundary treatment is removed
- Network of alleyways to provide access to terraced homes and flats is appropriately controlled

Internal Drainage Board – Comments

- Testing shows a drainage strategy reliant on infiltration to be achievable

Norfolk Historic Environment Service – No comments (no recommendation for archaeological works)

Historic England – No objections (subject to conditions)

- Site is within Holt and adjacent to Glaven Conservation Areas and two grade II listed properties to the north of the site (Hill House and Methodist Church)
- Conservation Area Character Appraisal identifies the site as contributing to Holt Conservation Area's significance, with positive views looking west from Norwich Road. The proposed site forms a buffer between the urban settlement of Holt and the countryside.
- changes represent an improvement in how the development responds to its sensitive landscape and heritage context. The reduced building heights and enhanced green infrastructure would better preserve the visual transition between the built-up edge of Holt and the open landscape of the Glaven Valley. The additional planting and open space provision would assist in filtering views from Spout Hills and the Glaven Valley Conservation Area.
- amended proposals represent a constructive and generally successful response to our earlier concerns. The revised layout, reduced building heights and strengthened landscape framework deliver the allocation in what now appears to be the least harmful form, achieving a more sensitive relationship with the Holt and Glaven Valley Conservation Areas and the wider landscape setting.

Conservation and Design (NNDC) – No objections

- The alterations to the layout and house type designs have addressed the primary concerns that previously led to a Conservation and Design objection
- As with the previous iteration, the plots are arranged around the central open space, and for the most part there is a sufficient amount of variation in building lines and plot orientation to provide some interest, in addition to varying the detailing across the house types. The hard line of development at rear of the site has been addressed through the new layout which has allowed the long-range views into the open countryside to be retained giving a sense of the built form tapering away from the town.
- The applicant has provided a site section as requested, which has provided a better understanding of how the new buildings will sit amongst the existing topography without becoming overbearing on the surrounding dwellings.
- As previously, the proposed designs and materials across the different plots are largely compatible with the general form and character of Holt
- Following revisions and reduction of first floor glazing on plots 10 and 11 consider the proposals policy compliant with the design, landscape and heritage policies

Local Member Councillor Connor Rouse

Objects – see comments above in “REASONS FOR REFERRAL TO COMMITTEE”

REPRESENTATIONS

60 representations have been received during the course of the application, 60 **objections** and 1 **Supporting** comment. The main concerns are summarised (full public comments can be viewed on the public website):

Objections:

- Insufficient consultation process / delays in putting up site notices
- No public consultation engagement from applicants
- Prematurity of the proposals / not an allocated site at the time
- Detriment to Conservation Area and designated heritage assets and landscape

- Does not preserve nor enhance designated heritage assets
- Land should remain undeveloped / loss of green space
- Loss of biodiversity, detriment to local wildlife and protected species
- Detriment to Spout Hills from developing site and increased visitors etc
- Inadequate drainage strategy, surface water run off / flooding concerns
- Similar objections to those cited under PF/23/0537
- Concerns over design of proposals
- Insufficient infrastructure, services and amenities to support additional housing (concerns over water pressure and sewage capacity, no capacity at local schools, GP, dental, lack of job availability)
- Detriment to neighbouring residential amenities through additional disturbances, noise, loss of light, light pollution, disruption, overbearing and loss of views
- Site acts as an important ecological and landscape buffer between the town and Spout Hills and wider countryside
- Significant developments have already been built in Holt, insufficient demand for more housing
- Highway safety concerns, Pound Close narrow road, traffic hazard, pedestrian safety, congestion on Norwich Road
- Insufficient plans showing relationship with surroundings / ecological details
- Overdevelopment of the site
- Overdevelopment of the town
- Housing does not reflect local need / unaffordable / used as second homes / holiday lets
- Insufficient provision of affordable housing
- Development too close to existing properties / insufficient separation distances
- Dominating scale – should be mostly single storey given levels differences
- Inappropriate density
- Inappropriate housing mix and tenure
- Inconsistencies / insufficient BNG details
- Public open space insufficient
- No paths from Pounds Close to safely walk to open space
- Inappropriate levels of proposed development, should be lowered to reduce impacts
- Impact on heritage assets inadequately assessed
- Contrary to Neighbourhood and Local Plans and NPPF (regarding loss of green space and impact on designated assets)
- Insufficient viability details
- Path to Spout Hills should be available to all not private gated entrance for private use by residents of the development only
- Conflict of interest with the Town Council with the proposed land transfer
- Concerns translocation site not viable

Support

- Positive contribution towards local housing need
- Proposals would preserve Holt's character

HUMAN RIGHTS IMPLICATIONS:

Art. 8: The right to respect for private and family life.

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

Having considered the above matters, 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.

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 to this case.

RELEVANT POLICIES:

North Norfolk Local Plan 2024-2040 (December 2025):

CC1- Delivering Climate Resilient Sustainable Growth
CC3 - Sustainable Construction, Energy Efficiency & Carbon Reduction
CC4 - Water Efficiency
CC7 – Flood Risk & Surface Water Drainage
CC8 - Electric Vehicle Charging
CC9 - Sustainable Transport
CC10 - BNG
CC11 - Green Infrastructure
CC12 – Trees, Hedgerows & Woodland
CC13 - Protecting Environmental Quality
SS1 – Spatial Strategy
HC1 - Health & Wellbeing
HC2 - Provision & Retention of Open Spaces
HC4 Infrastructure Provision, Developer Contributions & Viability
HC5 - Fibre to the Premises (FTTP)
HC7 - Parking Provision
ENV2 - Protection & Enhancement of Landscape & Settlement Character
ENV3 - Heritage & Undeveloped Coast
ENV4 - Biodiversity & Geodiversity
ENV5 - Impacts on international & European sites, Recreational Impact Avoidance Mitigation Strategy
ENV 6 - Protection of Amenity
ENV7 - Protecting & Enhancing the Historic Environment
ENV8 - High Quality Design
HOU1 - Delivering Sufficient Homes
HOU2 - Delivering the Right Mix of Homes
HOU8 - Accessible & Adaptable Homes
HOU9 - Minimum Space Standards
DS1 - Development Site Allocations
H17 - Holt - Land North of Valley Lane

Holt Neighbourhood Plan (August 2023)

Policy Holt1 – Design Guidance
Policy Holt2 – Housing Type & Standards
Policy Holt3 – Green Infrastructure
Policy Holt6 – Connectivity in and Around Holt

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

Material Considerations:

National Planning Policy Framework (December 2024):

- Chapter 2 Achieving sustainable development
- Chapter 4 Decision-making
- Chapter 5 Delivering a sufficient supply of homes
- Chapter 6 Building a strong, competitive economy
- Chapter 8 Promoting healthy and safe communities
- Chapter 9 Promoting sustainable transport
- Chapter 10 Supporting high quality communications
- Chapter 11 Making effective use of land
- Chapter 12 Achieving well-designed places
- Chapter 14 Meeting the challenge of climate change, flooding and coastal change
- Chapter 15 Conserving and enhancing the natural environment
- Chapter 16 Conserving and enhancing the historic environment
- Chapter 17 Facilitating the sustainable use of minerals

Supplementary Planning Documents:

- North Norfolk Design Guidance (2011)
- North Norfolk Landscape Character Assessment (2021)
- North Norfolk Landscape Sensitivity Assessment (2021)
- North Norfolk Open Space Assessment (2019)

Other relevant documents

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

OFFICER ASSESSMENT:**MAIN ISSUES FOR CONSIDERATION:**

1. Principle of development
2. Housing Mix
3. Design and amenity
4. Impact on Landscape
5. Ecological impacts, BNG and GIRAMS
6. Developer contributions
7. Highways and Parking
8. Heritage
9. Flooding and Drainage
10. Conclusion and Planning Balance

1. Principle of Development

The spatial strategy for North Norfolk is set out within Local Plan Policy SS 1. This states that the majority of new development within the district will take place in the larger towns and villages having regard to their role as employment, retail and service centres, identified need and capacity to accommodate sustainable growth. The policy lists Large Growth Towns, Small Growth Towns, Large Growth Villages and Small Growth Villages. The rest of North Norfolk is designated as 'Countryside' and development will be restricted to particular types of development to support the rural economy, meet affordable housing needs and provide renewable energy. Holt is designated as a Small Growth Town in the settlement hierarchy (where a lesser quantity of development will be located), the site is an adopted allocation within the settlement boundary.

The site subject of this application is allocated in the new Local Plan for housing growth under Local Plan Policy H17 - Land North of Valley Lane. Proposals for the site should be in accordance with and compatible with the site-specific Policy H17. This policy sets out proposals should include the provision of approximately 27 dwellings, public open space, and associated on and off-site infrastructure including 10 supporting criteria for the allocation set out below.

1. *Carefully and sensitively designed development incorporating suitable open space and landscaping will be required to preserve, and where opportunities arise, to enhance, the setting of the Conservation Areas and Listed Buildings to the north;*
2. *Site layout, scale and massing which incorporates suitable landscaping and buildings that retain a soft edge to the settlement from Spout Hills County Wildlife Site;*
3. *Retention and enhancement of mature hedgerows and trees around the site;*
4. *Access to be provided from Pounds Close with an acceptable junction with the A148;*
5. *Improved pedestrian access across site into the Spout Hills from the town;*
6. *The submission, approval and implementation of a Surface Water Management Plan ensuring that there is no increase off site and safe access and egress;*
7. *The submission, approval and implementation of a Foul Drainage Strategy, including any enhancements and setting out how additional foul flows will be accommodated within the foul sewerage network;*
8. *Enhancement to sewerage infrastructure should be undertaken prior to the first occupation of any dwelling to prevent detriment to the environment and comply with the Water Framework Directive;*
9. *On site delivery of not less than 0.07 hectares of public open space or the agreed payment of an equivalent financial contribution for the extension or improvement of local open space provision; and,*
10. *Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS).*

The proposals are not fully policy compliant, the number of dwellings proposed for the site is 23 rather than the allocated 27. Furthermore, there is conflict with criterion 5 relating to an improved pedestrian access across the site into Spout Hills from the town. The site will be restricted to a gated pedestrian access for residents of the new development rather than promoting connectivity across the site for the wider public. However, there are alternative routes to Spout Hills in the vicinity and the parcel of land to the west showing the access is promoted as Biodiversity Net Gain (BNG) land where it would be disadvantageous for this to be a more formal route widely accessible to the public as this would be detrimental to habitat. The translocation site for the Slow Worms is proposed to be transferred to Holt Town Council and to include some public accessibility (subject to appropriate management).

As such while criterion 5 is not met, reasonable justification has been offered to depart, and other public benefits are offered as part of the proposals that weigh favourably in the planning balance.

In summary, the principle of residential development on this site is acceptable subject to compliance with Local Plan Policy H17 and other relevant Development Plan policies as set out within this report.

2. Housing Mix

Policy HOU 2 states that all new housing developments shall provide for a mix of house sizes and tenures in accordance with the prescribed criteria in the policy.

The proposals would be considered under the 10-25 dwellings or sites larger than 0.2 hectares criteria within Affordable Zone 2, whereby such scale of development would be expected to deliver at least 35% of affordable homes on site.

Regarding market dwellings, Policy HOU2 expects a housing mix where at least half the units shall comprise 2-3 bed properties of which 20% shall be two-bed and 80% three bed. Regarding the affordable housing mix requirements 25% shall be intermediate housing and the remainder rented in a mix comprising one, two and three bed with the majority two bed.

With a site allocation of 27 dwellings, it is recognised that the Policy HOU2 (in relation to schemes comprising 26 to 150 dwellings) requires at least one "serviced" plot on the site. However, the number of dwellings in the proposals is for 23, and this is below the policy threshold to include a serviced plot for self and custom house building purposes.

Officers note that the plans have evolved for this scheme in seeking to address matters raised by representations. This is in order to provide an appropriate design and landscaping layout and officers consider the proposals appropriately reflect the site context, constraints and sensitivities of the site and its surroundings rather than being a deliberate attempt to avoid policy requirements. This will be set out further in the report.

Policy HOU8 requires that all new homes must be designed and constructed in a way that enables them to be adapted to meet the changing needs of their occupants over their lifetime. Accordingly, all new dwellings shall meet the Buildings Regulations M4(2) Category 2 Standard. This requirement is also set out within Policy HOLT2 of the Holt Neighbourhood Plan. Also, under Policy HOU8 a minimum of 5% of dwellings shall be provided as wheelchair user dwellings in accordance with the Building Regulations M4 (3) standard Category 3 (this would be plot 23). Policy HOU 9 sets out that all new dwellings shall comply with or exceed the minimum Nationally Described Space Standards.

The proposed housing mix comprises four x 1 bed dwellings, one x 2 bed dwelling, thirteen x 3 bed dwellings and five x 4 bed dwellings,

The proposal is for 16 market dwellings and 7 affordable houses (plots 17-23). With an offsite contribution for a single affordable home.

The market housing mix consists of eleven x 3 bed and five x 4 bed houses. The provision of 2-3 bed properties amounts to 11 dwellings, exceeding the 50% requirement (which would have expected around 8 such units), however within this mix there are no 2 bed properties, and so this will not fulfil the requirement for 20% of the smaller units in the housing mix. However, it should be noted that the overall quantum of smaller units being provided exceeds the minimum requirement, and the affordable housing mix includes four x 1 bed flats and one x 2 bed dwelling.

Regarding affordable housing this would comprise four x 1 bed units, one x 2 bed unit and two x 3 bed units which would be transferred to a Registered Social Housing Provider, as such these units will be available in perpetuity at rents that meet Homes England Rent Standard (up to 80% of market rents). The proportion of affordable units would equate to approximately 30.4%. A commuted sum has been offered in lieu of an additional on-site unit, this balances the affordable housing offer. It is recognised that off-site financial contributions are not an option specified for larger schemes (10 or more dwellings) in the policy, as such there is a departure with these proposals in terms of achieving full policy compliance.

Housing Need

Housing need changes gradually over time, the latest information on housing need in Holt is set out below and clearly supports the need for affordable homes in Holt, including those for intermediate rent which will be let to local households:

As of 11 February 2025, there were 988 households on the Council's housing list who want to live in Holt. Of these 171 are in the highest priority bands 1*, 1 and 2. The largest need amongst these households is for smaller 1 and 2 bedroom homes but there is also a need for family homes in particular, larger 4-bed homes.

In terms of tenure the highest need is for rented homes. Of the 7 affordable units, 5 would be affordable rent and 2 shared ownership ensuing an appropriate tenure split according with policy HOU 2

Summary

There is some policy conflict regarding the housing mix with insufficient smaller units in the market housing mix, and only a commuted sum for the 8th affordable dwelling rather than 100% of affordable units on site. As the scheme falls short of the allocated 27 units there will be no self or custom build homes as part of the proposals.

On balance the broader mix of the scheme includes an appropriate mix of units, including smaller units as part of the affordable housing provision. The proposals will broadly satisfy local housing need and include an appropriate tenure mix. As such, the proposal would broadly accord with the aspirations of the Development Plan to create mixed and balanced communities.

The proposed affordable dwellings are of a compatible style to the market dwellings to ensure these are indistinguishable from other buildings on site. The housing mix is considered broadly appropriate but noting that there is an under provision of smaller two bed units. All proposed units would accord with the National Minimum Space Standards by meeting or exceeding these internal space requirements.

Officers note the limited policy conflict with Policy HOU2 but consider there to be broad compliance with main aspects and aspirations of the policy, we conclude that on balance the benefits listed above would outweigh that limited policy conflict. Further considerations is given in the Planning Balance section.

3. Design and amenity

Local Plan Policy ENV8 requires all development to be of high-quality design, that reflects the characteristics of the site and respects local character in terms of layout, landscaping, density, mix, scale, massing materials, finish and architectural details and delivers an energy efficient and low carbon development. All proposals should take account of the North Norfolk Design Guide SPD and proposals will be expected to demonstrate the proposals contribute positively to the public realm, retains important landscaping and natural features, includes appropriate landscape and ecological enhancements.

Policy HOLT1 of the Holt Neighbourhood Plan additionally sets out that design should have regard to the special interest and character of the Neighbourhood Area as relevant to the location, nature and scale of the proposals. This would fall under section 2 '*Elsewhere within the designated Holt Settlement Boundary*' whereby development should have regard to the importance of a combination of long and revealed views into the Conservation Area from public vantage points on its outskirts and the scale and grain of development in the vicinity of the site. The site is within the settlement boundary but is on its western edge, with open countryside to the west. As such the position on the edge of the town, and topography gives

prominence. Consequently, appearance and topography and key characteristics of town edge sites such as this have an intrinsic relationship to the wider Glaven Valley Conservation Area which lays to the south and west of the site.

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

Layout

The scheme layout seeks to respond to the edge of town location and maintain important visual connections through the site towards the green expanse of Spout Hills beyond and a soft boundary between the site and Spout Hills and surrounding countryside. This is achieved through location of the open space on the western boundary of the site and an east west axis estate road going through the site and incorporated landscaping along the estate road. The land falls to the west, with the proposals reflect the topography of the site with the development ridgelines undulating accordingly. The landscaping proposals, in addition, to the main open space to the western part of the site includes small green spaces and landscaping through the centre of the site and landscaping buffer to the northern boundary and southwestern boundary. The layout is considered appropriate and relates well with the setting and isn't overly regimented regarding the building line or road layout and the layout more informal with varied siting, orientation and ridge heights.

Scale and massing

The buildings would be predominantly two-storey, reflecting the predominant scale of built form in the area (with the exception being a single bungalow). The proposed density is not regarded as overdeveloped. The general density considerations per hectare is 30 for villages and 40 for towns as a starting point, with allowances made in allocated sites to ensure delivery of a range of uses and taking into account local density, character and site contexts. As noted above the allocated number of dwellings on allocation was 27, the proposals are for 23 dwellings. Some of the dwellings are large scale but Officers consider that the overall quantum and mix appropriately takes into account the local context of the site, ensuring a viable scheme and appropriate incorporation of landscaping and open space. The extent of built form and configuration is also considered acceptable given the semi-rural setting. There is articulation of the built form and roofscape reflecting the levels differences in the site and a varied roofscape.

Appearance

Design and materials have been chosen to reflect the traditional vernacular of the locality to reinforce local distinctiveness. The materials include flintwork, red and painted brick and clay roof tiles. The detailing is also appropriate with features including sash-style windows, bay projections, porches and decorative brick courses. The design and materials are reflective of vernacular local materials, scale and proportions. The visual design and appearance of the development is considered to be of a high standard sympathetic to the local character and site context.

There is appropriate variation of the building line and scales reflecting the topography of the site and opening up towards the open space and countryside to the west. Plots 10 and 11 flank the west of the site by the open space and tapers towards the countryside.

The design of the proposed dwellings is considered to result in a good mixed visual appearance, reflecting local vernacular characteristics / detailing and accords with local design considerations in the Local and Neighbourhood Plans and Design Guides.

Amenity

Policy ENV6 sets out that all new development will provide for a high standard of amenity including adequate living conditions. Development will not be permitted which causes unacceptable impacts on the amenity of neighbouring occupants or does not provide for adequate levels of amenity for future occupants. In assessing the impact of development on existing occupants, proposals should take account of the North Norfolk Design Guide or justify any departure from these standards must have regard to the following considerations:

- provision of appropriate private amenity space;
- loss of privacy and outlook and prevention of overlooking;
- loss of daylight and/or sunlight and prevention of overshadowing;
- prevention of disturbance from odour, noise, vibration, dust, air and artificial light pollution.

Paragraph 135 of the NPPF states that developments should create places with a high standard of amenity for existing and future users.

The North Norfolk Design Guide sets out minimum distances between dwellings looking at different types of elevation based on the living accommodation views that may be affected. Additionally, it states that residents should have the right to adequate privacy levels and that new development should not lead to any overbearing impacts upon existing dwellings. Existing residents should also be free from excessive noise and unwanted social contact. Additionally, private garden areas should be of adequate size and shape to serve their intended purpose. They should be substantially free from shading and are recommended to be of an area equal or greater than the footprint of the dwelling they serve.

The design guide includes guidance for spacing and distancing between properties to mitigate the impact on neighbouring amenity, as follows:

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

The majority of the gardens within the proposed development are comparable in size or greater than the footprint of the dwelling they would serve. However, there are exceptions to

this including plots 6 and 7, and plots 13 and 14, the latter is also in close proximity to neighbouring trees and the size and depth of rear gardens vis a vis the large footprints comprise around half the requirement. As such these properties have smaller proportioned gardens to their dwelling's footprint and challenge those plot size standards.

The flats would be served by communal outdoor amenity areas. Given the configuration of the site the flats are located in close proximity to plots 21 and 22. The distance between the flats (units 17-20) and these properties at the rear is 2.5m. The windows on the rear elevations serve the bathrooms and open plan kitchen / living areas, the latter of which are served by other windows and sources of light with windows on three elevations. However, the windows on the rear either face the blank elevation of plot 21 or alternatively the first-floor window overlooks gardens serving plots 21 and 22. This can be mitigated with the imposition of a condition for the first-floor kitchen window to be obscure glazed to reduce this impact to the affected plots. There is some amenity conflict with the proposed units on the development, but suitable mitigation will be provided to ameliorate impacts.

Regarding the impact on neighbouring amenity from the proposed development this is considered below.

Plot 10 to the southwest corner of the site is close to the converted barns 14A and 14B (distance to the boundary 5m) which is on the boundary of the site and is on lower ground with rooflights on the northern roof slope. The closest first floor window serves an ensuite and would be obscure glazed on the south elevation at the rear around 14m to the neighbouring boundary. There is a French door on the ground floor on this elevation serving the lounge. The other first floor window at the rear is set back as this is an L shaped property fronting the green. This serves bedroom 3 but this would be around 23m from the neighbouring property. Further details have been provided to show distance from the rooflights of the neighbouring property and windows of unit 10 with the distance to the first-floor front (west) window being between 16.5m and 20m. The first floor window on the west facing elevation faces due west, rather than directly overlooking the southerly direction towards the neighbouring property westwards as such given the orientation of the property, and intervening boundary treatment and landscape buffer, while not fully in accordance with the suggested separation distances of 18 - 21m the proposals are considered not to create unacceptable impacts on the amenity of neighbouring occupants through undue dominance or overlooking.

Concerns have been raised over the proximity of unit 5 with No. 4 to the southeast of the site. Unit 5 has been revised and now features a hipped roof to reduce the impact and dominance on the neighbouring property. The side elevations on the southern elevation have no fenestration and the boundary at this point includes a boundary wall between the two properties. The separation distance between the proposed dwelling and existing property varies between 8.89m and 12.53m. The separation guidance sets out 11m being appropriate distances between primary windows (on rear elevation of no. 4) blank elevations (side elevation of unit 5). The separation does not fully accord with the guidance set out in the design guide as the rear half of the unit would be within this separation distance. The unit is located to the north of the existing neighbouring property, as such would not significantly adversely affect daylight to the property, as set out the roof is hipped and there are no windows on this elevation and an intervening garden wall.

Units 4 and 5 form a semi-detached property, to the east of the site is a converted garage that was approved for conversion to a dwelling under application ref: PF/21/0917. There is no fenestration on the first-floor westward wall flanking the application site with the main outlook northwards and southwards parallel to the site. There is a window on this elevation at the ground floor level. A 1.8m fence will be erected along the boundary where there is currently no boundary treatment. There are other sources of light for the main living area within this property, equally there are permitted development allowances for enclosing fences walls and

gates as such the impact of the development is not considered to adversely affect this property from the status quo. There may be oblique views from the converted garage over the boundary westwards to the new properties but given the orientation this would not result in direct overlooking. On balance the proposals are not considered to result in an overbearing impact on the neighbouring properties regarding the impact from units 4 and 5.

Concerns have also been raised over the impact of unit no. 23 (comprising single storey dwelling with hipped roof) to The Stable Flat (formerly associated with Hill House) due to loss of natural day light, overlooking and overbearing impacts, and loss of privacy given the proximity to the neighbouring property (sitting on the boundary of the site). The Stable Flat has a first-floor window serving a bedroom that looks into the site, and the property and private garden is on lower ground than the application site extending along the northern boundary.

Unit 23 would be on a diagonal from the affected dwelling to the boundary, as such the separation distances to the built form wouldn't be affected given the configuration and orientation of the elevation and fenestration. Given the proximity, this unit was amended to form a single storey dwelling with hipped roof to mitigate the impacts on the existing property to the north. The fenestration on the side of unit 23 on the northern elevation would be obscure glazed and there would also be an intervening boundary fence around 1m from the unit and a landscaping buffer between this property and the existing dwelling of some 3m (around 4m separation between the boundary with The Stable flat). This landscape planting buffer extends across the whole of the northern boundary.

The distance of the boundary from the northern property from first floor windows across plots 11-16 (serving habitable rooms) varies between 14m – 18m). The degree of separation is considered acceptable and obscure glazing to provide suitable mitigation against overlooking concerns.

Concerns have also been raised over loss of light and shading to the property as this is to the north of the application site. Shading analysis has been undertaken and shows limited impact of overshadowing on the neighbouring property. For example, limited shadowing from unit 23 would be experienced in the winter season where the sun is lower. The private amenity space is to the west of the dwelling, as such there would be shading from the dwelling and existing boundary wall and outbuilding as the sun moves round to the west. The nearest ground floor are wooden doors, with windows on the centre of the property. The shadow casting indicates part of unit 23 would cause additional overshadowing but this would be for a limited period, and only a limited part of the ground floor windows. As such the proposals are not considered to adversely impact neighbouring amenity through loss of light, overshadowing, overbearing impact, overlooking given the relationship of the development with the property to the north.

Conclusion

Whilst noting the concerns raised by neighbours, Officers consider that the proposals are acceptable in terms of design and amenity and where there is conflict within the site this can be mitigated with appropriate obscure glazing to minimise amenity impacts.

Environmental sustainability and fibre connectivity

Policy CC1 sets out development shall be delivered with the highest regard to sustainable development and climate change principles including positively contributing to mitigating and adapting to climate change, minimising greenhouse gas emissions, focusing larger scale development into the most sustainable areas where services are available, facilities can be supported and more sustainable modes of transport are viable.

Policy CC 3 sets out that new development is required to achieve progressively higher standards of environmental sustainability. This includes reductions in CO2 emissions of a minimum of 31% below the Target Emission Rate.

Policy CC 4 sets out all new development must be designed and constructed in a way that minimises its impact on water resources, with all new dwellings designed and constructed in such a way that enables them to meet or exceed Building Regulations Part G water efficiency higher optimal standard. Policy HC 5 requires all dwellings to be provided with fibre connections.

The proposals adopt a fabric first approach to exceed the minimum requirements of Building Regulations Part L for thermal performance and through appropriate measures achieve reductions in CO2 emissions of 56% below the Target Emission Rate. Regarding water efficiency, development would use low water consuming fittings to achieve a minimum water efficiency of 110 l/p/d (estimations indicating 108.8 l/p/d). BT Openreach have confirmed that a supply is available and they can provide the site with fibre, extending the existing fibre network from Norwich Road.

The proposals would accord with the new policy considerations concerning environmental sustainability and fibre connectivity.

4. Impact on Landscape

Policy CC 12 sets out proposals should retain existing trees and hedgerows and include the provision of new trees and hedgerows including street trees and woodland. Regard shall be taken of the North Norfolk Landscape Character Assessment and encouraged to mitigate against the impacts of climate change, enhance the character and appearance of the district and improve green infrastructure. Harm or loss of landscape features will only be permitted where a landscape strategy would compensate for the loss or where the overriding benefits arising from the proposals outweighs the harm. Where development could affect existing and retained trees and hedgerows details shall be provided for their care and protection with mitigation measures in place to ensure works do not have a harmful impact on existing trees.

The site lies on the western edge of Holt within Holt Conservation Area and directly adjacent to the Glaven Valley Conservation Area and Spout Common County Wildlife Site (CWS). The site is currently a small paddock that links with other fields, woodland and green space forming the setting to Holt. The site slopes away to the west towards a tributary of the River Glaven within Spout Common.

The site lies on the cusp of two classified Landscape Types, Wooded Glacial Ridge and River Valley (RV5 River Glaven), as defined in the North Norfolk Landscape Character Assessment (2021 SPD). Minimal light pollution and dark night skies are noted valued features of the Wooded Glacial Ridge Type, and the wealth of biodiversity is a key feature of the River Valley Type, along with the overall character of a wooded, enclosed and pastoral landscape with small field sizes on the valley floor

The landscape character does have capacity to accommodate development subject to the scale and design assimilating into the into the surroundings.

The application is not accompanied by a Landscape Visual Impact Assessment (LVIA). However, officers have visited the site and surrounding viewpoints towards the application site to be able to make an appropriate assessment on the impacts on the Conservation Area and landscape character.

The revised layout presents a more appropriate orientation of units that satisfactorily addresses previous concerns in relation to landscape and visual impact. Views through the site to Spout Hills and the countryside beyond are retained. Landscape buffers at site boundaries are improved and there is a better relationship with the countryside with the open space on the western side of the site to ensure a soft edge to the settlement and mitigating the impacts to the west from extensive built form or light spill with the amended proposals and reduced glazing extents.

The layout appears rather parking dominated with a number of parking courts and accesses; this is partially mitigated with wrapping soft landscape planting around the parking areas to reduce the impact of parked vehicles

The design, variation of scale, materials and landscaping go a significant way to mitigate the landscape impacts. Subject to the imposition of conditions, the proposals are considered broadly acceptable from a landscape perspective in accordance with Local Plan Policy ENV2.

5. Ecological impacts, BNG and GIRAMS

Policy CC10 sets out that qualifying development must achieve a minimum of 10% Biodiversity Net Gain. The accompanying biodiversity net gain strategy should set out the pre-development biodiversity value of the development site, demonstrate application of the mitigation hierarchy, clarifies and explains the predicted biodiversity outcomes, compliance with the BNG Hierarchy and details of how it will be maintained for at least 30 years after the development is completed.

Policy ENV4 sets out all policy proposals will be expected to provide suitable ecological surveys, retain, protect and buffer ecological and geological features and provide for the appropriate management of those features, deliver BNG, incorporate biodiversity enhancement measures and avoid net loss or fragmentation of habitats. Adverse impacts must be addressed, be in accordance with the requirements of the Conservation of Habitats and Species Regulations 2017 and any adverse effects on nationally and locally designated sites only permitted where it can be demonstrated that the needs outweigh the adverse impacts.

Policy HOLT3 of the Holt Neighbourhood Plan identifies the green infrastructure network, this includes Spout Hills County Wildlife Site. Development proposals that adjoin the network are required to not harm the habitat connectivity present in that part of the network and identify and pursue opportunities for securing measurable net gains for biodiversity, including habitat connectivity, proportionate to their scale and impact.

Paragraph 187 of the NPPF sets out that development should contribute to and enhance the natural and local environment by protecting and enhancing sites of biodiversity value, minimising impacts on and providing net gains for biodiversity.

Ecology

The application is accompanied by an appropriate ecological assessment. The site lies immediately east of Spout Common County Wildlife Site, a lowland fen and a UK priority Section 41 habitat.

The Ecological Impact Assessment (2024) has highlighted that increased recreational pressure onto Spout Common is likely if the proposed development is granted planning permission. The comments provided by Norfolk Wildlife Trust highlight that the increase in

recreational pressure upon the lowland fen habitat would further degrade its condition, and that a financial contribution towards the management of the County Wildlife Site is recommended. This has been recommended at £2,000 for the next 30 years (totalling £60,000). A financial contribution to the Norfolk Wildlife Trust is considered appropriate in this case given the increase in management requirements to offset the increase in recreational impacts.

The revised layout includes wildlife corridors on the northern, western and partially on the southern boundary. The revised layout also includes a reduction in height of the corner properties from three to two storey which will reduce light spill onto the wildlife corridors and the neighbouring Spout Hills County Wildlife Site. Bats use the western and southern boundary of the site for foraging and for commuting between roosts and feeding sites.

The site is also used by a barn owl with a roost adjacent to the site. The loss of rough grassland on the site will remove important local foraging habitat for this Schedule 1 protected species. The proposed BNG / slow worm translocation site will be managed as rough grassland and will provide alternative foraging habitat for the barn owl, although it will have to forage further from its roost. This is land proposed to be transferred and made publicly accessible under an ecology management plan. The land is under the applicant's ownership. Any translocation would need to be supported by an appropriate management plan. The translocation land would be need to be secured through a S106 obligation.

Following the 2024 reptile surveys a population of slow worms was found on the proposed development site. The Ecological Impact Assessment identified an intermediate negative effect if mitigation is not carried out. Mitigation is proposed as capture and translocation of the slow worm population to a site 80m west of the development site. The proposed slowworm translocation site has boundary scrub/ trees on the western, and partially on the eastern side. The southern boundary scrub abuts the old railway line (now a footpath) with the site having access for wildlife to commute to the wider countryside. The site would not have public access reducing disturbance to wildlife on the site and will form part of the Biodiversity Net Gain requirements for the application.

Subject to the translocation site for the slow worms being enhanced prior to translocation, with details to be secured through a Reptile Mitigation Strategy reverting the site to rough grassland with appropriate mowing regimes and include basking areas, hibernacula etc the ecological mitigation and enhancement measures are considered appropriate, other such measures include.

- Enhancement of agreed translocation site
- Any works impacting eastern boundary close to outbuilding to be carried outside of the barn owl nesting season (February -October)
- Wildlife buffer strip on western, northern and southern boundary to retain and protect foraging and commuting habitat for bats and other wildlife and protect Spout Hills County Wildlife Site (CWS).
- Native hedgerow planting along the site boundaries
- Wildflower planting in the public green
- Installation of 1 bat tube within each house
- Installation of swift bricks / boxes
- Installation of 1 integrated bird box within at least 7 of the new houses

GIRAMS:

The cumulative recreational impacts from new overnight accommodation in Norfolk is considered to have a significant adverse impact upon the integrity of European Sites. The Norfolk Authorities adopted the Green Infrastructure and Recreational impact Avoidance

Mitigation Strategy (GIRAMS), a strategic mitigation measure, on 1st April 2022. GIRAMS requires a tariff payment of £304.17 per dwelling to be made by the developer to fund mitigation measures to be implemented across Norfolk. Subject to securing this payment there would be no other potential pathways of impacts upon any other designated sites.

Biodiversity Net Gain

The application is subject to mandatory 10% BNG enhancement requirements. Accurate baseline values must be agreed prior to determination to allow both the council and applicant to be fully informed of the unit requirements to deliver 10% BNG across all relevant unit types.

Trees and boundary features have been excluded from the baseline calculations; these should be included in the baseline figures and the inclusion of these could increase the BNG requirements accordingly.

On site habitat creation would comprise modified grassland along western, northern and southern boundaries (0.1887 ha), 39 trees would be planted along the roads and accessways (0.1588ha). Gardens would take up 0.2676ha, urban surfaces including roads and buildings 0.4503ha. The report considers this would result in a net unit loss of -0.86 habitat units (36.82% net loss). However, concerns have been raised over the suitability of the location of some of the tree planting, and omitting existing features etc as such the net loss is likely to be higher. Offsite net gains are therefore required; mitigation would be on the land to the west (adjacent to the application site). This land comprises neutral grassland, bramble scrub and gorse scrub with a small area of broadleaved woodland and two small ponds. Proposals include creation of a small area of hawthorn scrub in the southwest corner and enhancement of the neutral grassland to moderate condition and bramble scrub to mixed scrub and 5 trees to be planted. The figures suggest an overall creation and net gain of habitat units of 20.5%.

An agreed baseline habitat in the metric calculations, and suitability of the location of trees on site will be achieved through the BNG baseline map and metric. Officers consider these can be agreed accordingly with sufficient offsite BNG land to deliver the statutorily required minimum of 10% net gains.

The site is also identified in the Local Nature Recovery Strategy, whereby habitats of strategic significance receive higher values on the metric, an uplift of 15% to the value of habitats being created on the metric to promote enhancement of such areas. Scrub, trees and hedgerows would fall into this uplift.

The delivery of the proposed mitigation and enhancement measures and BNG with contribution to the CWT would ensure appropriate mitigation and enhancement measures are achievable and delivered. As such the proposals do not adversely affect protected sites and species. This is subject to revisions to the BNG metric to ensure the habit baseline is accurate and the enhancements are achievable and meet or exceed the required BNG 10% net gain.

Subject to this and the other mitigation and enhancement measures (and contributions) the proposals are considered to satisfy policies CC 10, ENV 4 of the Local Plan, HOLT1 of the Holt Neighbourhood Plan and Section 15 of the NPPF.

6. Developer contributions

Policy HC4 requires the delivery of necessary infrastructure and secure sustainable development. The Council will secure infrastructure through specific developer contributions in order to service, manage and mitigate the impact of development which meets the tests of the NPPF. Development will be expected to contribute towards the provision of infrastructure, affordable homes, community infrastructure, deliver and maintenance of open space,

sustainable transport, environmental infrastructure, visitor impact mitigation, other requirements in Neighbourhood Plans and monitoring purposes.

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

The North Norfolk Open Space Assessment provides the most up to date evidence of local need. It provides the justified evidence to support the requirement for open space contributions.

Based on the mix of housing tenures, sizes and types shown within the submission, there would be an on-site requirement for amenity green space, play space for children and off-site contributions where required for allotments, parks and recreation, play space (youth) and natural green space.

Assessment of Requirements

Allotments:

The requirement is 340.80 sqm (£9,427) for the proposed development. There is an existing overprovision of 0.99ha in Holt, as such a contribution towards allotments would not be necessary.

Parks and Recreation Grounds:

The requirement is for 624.80sqm (£71,883) for the proposed development. The definition provided of Parks and Recreation Grounds states that they are “*defined as an open space that: Has at least two facilities e.g. a children’s play area and tennis courts, or; Has provision for formal sports pitches e.g. football or cricket pitch (informal football would be excluded); and Is owned/managed by the Council (or Town/Parish Council), for general public access.*” The proposed on-site open space would not provide two facilities or sports pitches and therefore would not meet the definition of Parks and Recreation Grounds. A contribution of £71,883 is therefore required.

Play Space (Children and Youth):

There is a requirement for 56.8 sqm of children play space for the proposed development, and 34.08 sqm of youth play space (combined total requirement is for 90.88sqm. A dedicated area has not been shown in the public open space area, contributions of £16,890 would therefore be required.

Amenity Green Space and Natural Green Space:

The requirement is for 568 sqm of Amenity Green Space for the proposed development.

Criteria 9 of the allocation policy sets out that not less than 0.07 ha of public open space should be included or agreed payment of equivalent financial contribution for the extension or improvement of open space provision.

The open space to the western part of the site would be 1,492sqm more than double the requirement, in addition to smaller parcels of green space and landscape buffers included in the site as well.

The requirement for natural green space is 852 sqm. The translocation site being transferred could be considered to fall under the Natural Green Space consideration whereby such land “*covers a variety of spaces including meadows, woodland, copse, river valleys and lakes all of which share a trait of having natural characteristics and biodiversity value and are also partly*

or wholly accessible for informal recreation". The translocation site would exceed the requirements for the natural and green space contributions.

There is an overprovision of green and natural green space land being provided as part of the proposed development exceeding the open space metric and policy allocation requirements.

There is an overprovision of allotments in Holt, as such contributions for this isn't required, but off-site contributions of £88,573 towards parks and recreation grounds and children's play area would be required to satisfy local requirements to be included in a S106 Obligation.

Contributions would also be required for other services and facilities including areas such as primary education, libraries and fire hydrant requested by Norfolk County Council. The Local Planning Authority also received a request from the Norfolk Wildlife Trust to mitigate against additional recreational disturbances on the site.

A table of S106 financial and non-financial contributions expected from the development is set out below.

Contribution Description	Amount (index linked)	Cost Per Dwelling (approx.)	Agreed to be paid by the applicant?
Affordable Housing (7 units – 5 social rent, 2 shared ownership)	On-Site Provision	-	Yes
Commuted sum	£100,000		Yes
NCC Education contribution – Special Education Needs and Disabilities (SEND)	£96,806	£2,059.70	Yes
Norfolk Wildlife Trust	£60,000		Yes
GIRAMS Tariff*	£6,995.91	£304.17	Yes
Library Contribution	£4,255	£185	Yes
Fire Hydrant (one)	On-site provision	-	Yes
NNDC and NCC S106 Monitoring Fee	£500 per obligation	-	Yes
Open space contributions	£88,573		Yes

**This contribution is mandatory in order to satisfy Habitats Regulations*

Subject to securing the required contributions through S106 obligation (or condition(s) as may be the case with the Fire Hydrant), the proposals would accord with the requirements of Core Strategy Policy HC 4.

7. Highways and parking

Policy CC 9 sets out that development shall be well located and designed to minimise the need to travel and maximise use of sustainable forms of transport

Policy HC 7 (Parking Provision) states that adequate vehicle parking facilities will be provided by the developer to serve the needs of the proposed development and in order to avoid inappropriate on-street parking, highway safety problems and protect living and working conditions locally. Development proposals should make provision for vehicle and cycle parking

in accordance with the Norfolk County Council Parking Guidelines and take into account the requirements of the North Norfolk Design Guide.

Policy CC 8 sets out appropriate provision for electric vehicle charging points shall be incorporated into proposals appropriate to its context and location and precise details of this provision (including number, layout and charge points) how this will be allocated and managed including mechanism / procedure for taking payments.

The internal access road would be a private permeable shared surface extending east to west linking the open space with the rest of the town. There is sufficient manoeuvrability and parking provision within the site to accommodate the proposed development. There would be policy compliant parking provision commensurate for the sizes of properties in accordance with local policy comprising 55 parking spaces, more details are required regarding cycle storage provision however to demonstrate appropriate provision. For vehicular parking provision the 1 bed flats would have 1 space each, 2 and 3 beds would have 2 spaces each and the 4 bed units would have a minimum of 3 parking spaces and there would be 5 visitor parking spaces on the site. Further details of cycle storage are required but will be secured by condition. Electric vehicle charging points would be incorporated into the proposals and similarly secured by condition.

The highway authority has raised no objections to the proposals on highway safety grounds including additional vehicular movements to and from the site and joining onto Norwich Road etc noting the concerns raised by the public in the public consultation. There is considered appropriate capacity in the local highway network to accommodate the proposed development. A Traffic Regulation Order would however be required for waiting restrictions on Pound Close to ensure appropriate free flow of traffic at the junction to be secured by suitably worded condition. The proposals would accord with Development Plan policy requirements and complies with criteria 4 providing the access from Pounds Close

8. Heritage

Policy ENV7 requires that development proposals will conserve and, where possible, enhance the historic environment. This includes conserving historic landscapes and built form and settings and protection for designated and non-designated heritage assets and Conservation Areas.

Criterion 1 and 2 of the allocation policy are most pertinent to the consideration of the impacts on heritage assets (requiring the proposals to be carefully and sensitively designed to preserve and enhance setting of the Conservation Areas and Listed Buildings and ensuring the suitable retention of a soft edge to the settlement).

The application site is situated within the Holt Conservation Area, on the western edge of the town, and falls into the Glaven Valley Conservation Area, in addition to bordering the Spout Common County Wildlife Site. New development in a conservation area should seek to preserve or enhance the prevailing character and appearance, and in line with para 196 of the NPPF plans should take into account the 'desirability of new development making a positive contribution to local character and distinctiveness'. Also near the application site are two Grade II listed buildings: Hill House and Holt Methodist Church.

The site itself acts as a buffer between the urban development of Holt and the surrounding countryside, as highlighted in the Holt Conservation Area (2022) it also allows views over the open countryside from Pound Close off the west side of Norwich Road, and provides the conservation area with a green setting overlooking Spout Hills and the wider Glaven Valley.

The immediate context of the site along Norwich Road is varied, with some modern properties interspersed with older ones, there is a mixture of vernacular, Georgian and neo-Georgian character. On the west side of the road, properties are generally set back from the road and there are lots of trees lining the road with a number of grass verges also.

Concerns were raised with the design and layout of the original proposals submitted with the application, with reservations given over the lack of variation in the building line and scale of the properties and design in particular of the properties at the western part of the site. The western part is particularly sensitive given the proximity of Spout Hills and buffer between the countryside and town of Holt on this edge of settlement location. The design of the rear plots 10-13 raised concerns including the incongruous rear elevations given the disconnect with the architectural style of the site, large extent of glazing and balconies on the rear and associated visual impact on views towards the town and Conservation Areas.

The revised proposals including alterations to the layout and design have sought to address concerns raised with the original proposals.

As with the previous iteration, the plots are arranged around the central open space, and for the most part there is now an appropriate variation in building lines and plot orientation to provide more interest, in addition to varying the detailing across all house types. The “hard line” of development at rear of the site has been addressed through the new layout which has allowed the long-range views into the open countryside to be retained giving a sense of the built form tapering away from the town.

A site section is now provided, which has shown a more sympathetic understanding of how the new buildings will sit amongst the existing topography without becoming overbearing on the surrounding dwellings.

The proposed designs and materials across the different plots are now more compatible with the general form and character of Holt. The revisions have addressed the primary issues with plots 10-13 over the quantity of glazing, this has successfully addressed a concern at the first-floor level to plots 10 and 11 where the large wrap around openings were considered out of scale with the rest of development.

Overall, Officers consider that the proposals are acceptable from a heritage and conservation perspective. They would not result in detrimental impacts on the significance of the designated and non-designated heritage assets, and their character and appearance would predominantly be preserved. The proposals would accord the Development Plan policy considerations.

9. Flooding and drainage

Policy CC 7 sets out development will be located where this minimises the risk of flooding, and mitigating such risk through avoidance, design and implementation of sustainable drainage (SuDS) principles. Development should not materially increase flood risk to other areas and will incorporate appropriate surface water drainage mitigation measures to minimise its own risk of flooding. Proposals will have regard to climate change and flood extents from all sources identified in the NNDC Strategic Flood Risk Assessment, and subsequent updates.

Additionally, developers will be required to demonstrate compliance with national policy, by showing the development:

- does not increase greenfield run off rates and vulnerability of the site,
- has a positive impact on the risk of surface water flooding,

- addresses potential impact of infiltration upon groundwater,
- provides adequate foul water treatment and disposal,
- has suitable access is safeguarded and does not compromise existing drainage schemes of a larger site.

Open areas within new development must be designed to optimise drainage and reduce run-off. Where SuDS are proposed development proposals should be an integral part of the green infrastructure framework and provide multi-functional benefits. Adherence to LLFA Guidance which includes appropriate Flood Risk Assessment / Drainage Strategy and follows the drainage hierarchy. Drainage requirements including detailed maintenance and management arrangements for the lifetime of the development will be secured by way of planning conditions and / or obligations.

The application is accompanied by a flood risk assessment and drainage strategy. The site falls towards the west, the highest part of the site is at the entrance from Pounds Close at 62.96m AOD, falling to 56.24m in the northwest corner, with average gradient levels across the site of 1:15. The site lies at the head of a valley. A spring arises approximately 70m from the western corner of the site at a level of 44m AOD (12m below the lowest part of the site) and flows north along the valley.

The site is situated within flood zone 1 (the lowest probability of flooding). The geology is suitable for infiltration. Drainage infiltration testing on the site has provided favourable results, and groundwater was not encountered. The site is located within a groundwater Source Protection Zone (SPZ). There is no formal provisions for drainage on the existing site, rainfall is assumed to naturally soak into the ground when infiltration capacity is reached would be directed towards River Glaven catchment. Estimated groundwater level is at least 16m below site ground levels, the risk of groundwater flooding occurring is therefore considered to be very low. The SPZ is an area of protection placed around abstraction.

The site is considered at low risk of flooding from all sources other than surface water flooding. The drainage strategy for the site includes the use of soakaways, permeable paving and rain gardens, reducing flood risk by attenuating the rate and quantity of surface water run-off for and promoting groundwater recharge via infiltration.

Surface water run-off from roof areas will be directed to individual shallow soakaways located in back gardens, or communal soakaways would be placed to the front including in the open spaces. Finished floor levels would be set at a minimum of 150mm above ground levels. Private roads, soakaways and parking spaces would have permeable surfaces for natural infiltration.

The surface water drainage strategy is considered acceptable.

Regarding foul drainage, there is a foul sewer available in the existing access off Norwich Road and Anglian Water has confirmed the foul sewer system has available capacity at the site. Given the ground levels the connection to the public sewer would be a pumped connection. There is capacity at the Holt Main Road Water Recycling Centre for foul water from this development.

The proposals are considered to accord with policy CC7. As set out in the response from Anglian Water, there is capacity in the local infrastructure to accommodate the proposed development and no request has been put forward to enhance the sewage infrastructure, in the absence of an identified need to enhance this infrastructure it is considered that criteria 8 of the allocation policy requiring foul water upgrading may be departed from in such circumstances.

10. Allocation criteria, Conclusion and Planning Balance

Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 sets out that decisions must be taken in accordance with the Development Plan unless material considerations indicate otherwise.

Proposals for the site should be in accordance with and compatible with the site-specific policy H17. This policy sets out proposals should include the provision of approximately 27 dwellings, public open space, and associated on and off-site infrastructure including 10 supporting criteria for the allocation set out in section 1 above.

As set out the proposals are to be considered against the site allocation policy H17. Officers consider the revised proposals have carefully and sensitively designed the development to incorporate open space which preserves / enhances the setting of designated heritage assets and incorporates appropriate landscaping to retain a soft edge of the settlement from Spout Hills CWT.

The layout retains views of the countryside from the town along the east west axis and incorporates landscape buffers / open space on the western boundary to ensure a soft edge is retained with views towards the development. The effect is to assimilate well with the existing edge of the settlement; this is enhanced by good levels of mature hedgerow and trees.

The proposals are considered compatible with criterion 1-3 (landscaping and heritage assets, design and retention of hedgerows and trees).

Appropriate access to the site can be achieved as demonstrated in the revised layout proposals (subject to a TRO), according with criterion 4 (access via Pound Close).

There is conflict with criterion 5 (improved pedestrian access across the site to Spout Hills) as the access to Spout Hills through the BNG land would be gated with coded access only available for maintenance and proposed residents. Officers note that there are already alternative routes to Spout Hills to the north and south. Further that wider public access through the proposed BNG land may impact delivery of other enhancements. Finally, that there are also levels differences between the application site and desired footpath link that may prejudice delivery of an accessible for all path. On this basis departure from criterion 5 relating to full public access is considered to be reasonably justified.

Criterion 6, the drainage strategy proposed demonstrates how surface water would be dealt with, according with the SuDS hierarchy. This would be dealt with through infiltration through the ground, the land is suitable for such techniques without creating undue run off from the site to adjacent land. Noting the comments from the LLFA a sensitivity check was required, further details around this confirming the details in the drainage strategy remain accurate and reflect the most up to date guidance. No objections to this have been received from any statutory consultee. On this basis and noting the onus is on the Local Authority to be satisfied. Officers consider the calculations modelling remain appropriate and consistent with guidance and policy.

Criterion 7 & 8, there is capacity in the local sewage network to accommodate the proposed development, as such enhancements to local infrastructure has not been set out or requested by Anglia Water to accommodate the proposed development, as such further details are not considered necessary for both criteria 7 and 8. (foul drainage strategy and sewerage infrastructure)

Criterion 9, there is an overprovision of public open space being provided. Where open space is not being provided on site the off-site contributions are to be secured for improvement to local parks and children play spaces. This is accepted given the site topography and proximity for offsite provision. Additionally, there would also be the transfer of the “translocation site” to Holt Town Council with managed public access. Subject to an appropriate scheme of management this is considered acceptable and would exceed the requirements of criteria 9 (Open Space).

GIRAMS contribution would be secured through the S106 agreement to satisfy criteria 10 (Visitor Mitigation).

There is broad compliance with the allocation policy with the benefits outweighing the conflict regarding lower number of dwellings being delivered, Self Build and Custom Housing shortfall and lack of a publicly accessible connection to Spout Hills through the site.

In addition to the above assessment of the allocation criteria officers note that there is a limited departure from design guide guidance around privacy and amenity, further that housing mix is not compliant with policy. These factors attract negative weight.

In addition to the criterion assessment above, the benefits include delivery of an allocated North Norfolk Local Plan site which addresses the districts affordable housing need. There would be the provision of 7 affordable homes and commuted sum of £100,000 for an additional unit to be provided off site. The proposals are well designed and includes appropriate landscaping and open space. Delivery of new open space and contributions of £88,573 for off site open space improvements to address local requirements. Ecological enhancements through delivery of BNG. Benefits which supports Holt's services, facilities, businesses and employment during the construction phase of the development.

Mitigation contributions would be provided regarding GIRAMS, impact of additional recreational impacts on Spout Hills, and education and library contributions to support these local services and able to accommodate the proposed development.

Officers are clear that the substantive benefits listed above will more than outweigh any harm arising from the policy departure and those other factors detailed in this report. As such officers consider that there is a positive planning balance and that the application should be approved.

RECOMMENDATION:

Delegate authority to the Assistant Director of Planning to APPROVE subject to:

- 1. Satisfactory resolution of new sustainability policies.**
- 2. Satisfactory resolution ecological matters including addressing the BNG baseline calculations and further details around the translocation site.**
- 3. Securing of S106 Obligations as set out at Section 6 of the report including Affordable housing and other financial contributions.**

Contribution Description	Amount (index linked)	Cost Per Dwelling (approx.)	Agreed to be paid by the applicant?
Affordable Housing (7 units – 5 social rent, 2shared ownership)	On-Site Provision	-	Yes

Commuted sum	£100,000		Yes
NCC Education contribution – Special Education Needs and Disabilities (SEND)	£96,806	£2,059.70	Yes
Norfolk Wildlife Trust	£60,000		Yes
GIRAMS Tariff*	£6,995.91	£304.17	Yes
Library Contribution	£4,255	£185	Yes
Fire Hydrant (one)	On-site provision	-	Yes
NCC S106 Monitoring Fee	£500 per obligation	-	Yes
Open space contributions	£88,573		Yes

4. Imposition of conditions including any considered necessary by the Assistant Director - Planning including matters relating to:

- **Time Limit for implementation**
- **In accordance with approved plans**
- **Materials**
- **Landscaping details, implementation and management**
- **Mitigation and enhancement measures set out in Ecological Assessment**
- **Construction Management Plan (CEMP)**
- **Highway access**
- **Provision of parking and retention**
- **Cycle parking provision**
- **Implementation and retention of refuse and recycling**
- **Drainage strategy and mitigations**
- **Permitted Development Right restrictions**
- **BNG Delivery**
- **Traffic Regulations Order**

Final wording of conditions to be delegated to the Assistant Director – Planning.

That the application be refused if a suitable section 106 agreement is not completed within 4 months of the date of resolution to approve, and in the opinion of the Assistant Director - Planning, there is no realistic prospect of a suitable section 106 agreement being completed within a reasonable timescale.