

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: 20 March 2026

Case Officer: Mark Brands

Full Planning Permission

BACKGROUND

The application first came before the Development Committee on 11 December 2025. At that time the Officer recommendation was one of refusal on the basis that the proposals were not considered to form an extension to an existing business and because they are located in an unsustainable countryside location. Officers considered there was insufficient supporting information to justify a departure from Development plan policy. The proposals were considered contrary to Policies SS1, SS2 and E3 of The North Norfolk Local Plan 2024-2040.

Having considered the proposal, the Development Committee resolved to **DEFER** the item “due to a lack of information regarding farm diversification, and how the application would support the estate...[and]...to see greater detail on the wider economic benefits to the district, specifically employment...”

Following the Committee resolution, further discussion has taken place and an additional supporting statement dated 06 Feb 2026 has been provided, a copy of which is available at **Appendix 1**.

Since last coming before Development Committee, the Council has adopted its new Local Plan which now forms part of the Development Plan for the District and which supersedes the Core Strategy. This report reflects the material change to the Development Plan.

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 parameter 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 long x 2.44m wide x 2.59 high)
- 144no. 20ft containers (dimensions 6.06m long x 2.44m wide x 2.59 high)
- 64no. 10ft containers (dimensions 3.05m long x 2.44m wide x 2.59 high)

The external appearance of the containers would be metal clad in a dark green colour. The facility would be accessible 365 days a year from 7am to 9pm each day. 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

06 Feb 2026 - Additional supporting statement

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

The application was DEFERRED at the Development Committee on 11 December 2025 “due to a lack of information regarding farm diversification, and how the application would support the estate...[and]...to see greater detail on the wider economic benefits to the district, specifically employment...” Additional information has been provided by the applicant.

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, approval 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)

CC1 - Delivering Climate Resilient Sustainable Growth

CC3 - Sustainable Construction, Energy Efficiency & Carbon Reduction

CC8 – Electric Flood Risk

CC9 - Sustainable transport

CC10 - BNG

CC12 - Trees, Hedgerows & woodland
CC13 - Protecting Environmental Quality
SS1 – Spatial Strategy (Except Small Growth Villages which is apportioned no weight
SS2 - Development in the Countryside
HC7 - Parking Provision
ENV2 - Protection & Enhancement of Landscape & Settlement Character
ENV4 - Biodiversity & Geodiversity
ENV6 - Protection of Amenity
ENV8 - High Quality Design
E1 - Employment Land
E2 - Employment Areas, Enterprise Zones & Former Airbases
E3 - Employment Development Outside of Employment Areas

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

OFFICER ASSESSMENT

Main issues for consideration:

- 1. Principle of Development**
- 2. Employment Development Outside of Employment Areas**
- 3. Highways**
- 4. Design, Landscape and Amenity**
- 5. Ecology**
- 6. Material Considerations**

1. Principle of Development

Section 38(6) of the Town and Country Planning Compulsory Purchase Act 2004 sets out that planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan now includes the Local Plan adopted on 17 Dec 2025.

The key purpose of Local Plan Policy SS1 is to set out the distribution of development (spatial strategy) and provide the framework to deliver sustainable growth to meet the existing and future needs for all types of development. The spatial strategy establishes a settlement hierarchy of identified Large Growth Towns, Small Growth Towns, Large Growth Villages, Small Growth Villages and Countryside Policy Area.

The purpose of Local Plan Policy SS2 is to manage the types of development allowed in the designated Countryside Policy Area. The policy approach sets out the strategic and overriding principle in areas outside settlements with development boundaries. The criteria set out the types of development that are considered appropriate in the rural area, which includes:

“a. use and development of land associated with agriculture or forestry;

...

g. extensions to existing dwellings and businesses;

...

i. new employment generating development ... where there is a demonstrable need for the development and where alternative sites within defined **Settlement Boundaries** are shown not to be available or suitable”

The purpose of Local Plan Policy E3 is to give support for the expansion of existing rural businesses and relevant new businesses based on agricultural, forestry and other uses where there are sustainable advantages of the use being located in close proximity to the market they serve. The policy provides a criteria for employment proposals outside designated employment areas and gives favourable consideration to such proposals as long as they meet the identified criteria.

Also of relevance are paragraphs 88 and 89 of the National Planning Policy Framework Dec 2024 (NPPF) which set out that planning decisions should enable the growth and expansion of all types of business in rural areas, 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.

In principle, subject to the proposal according with the requirements of Local Plan Policies SS1, SS2 and E3 and other relevant Local Plan policy requirements, the principle of development would be considered acceptable.

Where there is a departure from the Development Plan then such departures should be weighed in the planning balance against any relevant material considerations in favour which justify a departure from the Development Plan.

2. Employment Development Outside of Employment Areas

Officers consider that Policy E3 is most relevant to the determination of this application and the relevant requirements are set out below as follows:

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

- a. there is no suitable and available land on designated or allocated employment areas; or,
- b. there are specific reasons for the development not being located on designated or allocated employment areas, including, but not limited to:
 - i. the expansion of an existing business;
 - ii. businesses that are based on agriculture, forestry or other industry where there are sustainability advantages to being located in close proximity to the market they serve;
 - iii. industries and/or businesses which would be detrimental to local amenity if located in settlements, including on designated or allocated employment areas; and,
- c. the development would not adversely affect highway safety.”

Officers have assessed the proposal against these criteria below.

The applicant’s proposal involves an entirely new business venture in the countryside, in the form of a container storage business, which is not already accommodated on the Raynham

Estate. As such, Officers consider that, for decision making purposes, the proposal can reasonably be regarded as a new employment development located in the designated countryside policy area.

In terms of Policy E3 1.(a) and whether “there is no suitable and available land on designated or allocated employment areas” the applicant’s case does not necessarily seek to dispute that there may be land in Fakenham which could fulfil the business requirements for container storage. 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 applicant suggests that designated employment land in Fakenham could and should be better used where it would deliver greater employment benefit than that derived from container storage activities.

Officers note that Policy E3 does not consider site ownership, simply whether there is land available for the proposed use in a more sequentially appropriate location.

Officers consider that the proposal would be regarded as a departure from this element of Policy E3.

In terms of Policy E3 1.(b) and “specific reasons for the development not being located on designated or allocated employment areas,” Officers note that the proposal does not involve “the expansion of an existing business”. Whilst the applicant makes a case for the development supporting the wider Raynham Estate, container storage proposals are not of themselves “businesses that are based on agriculture, forestry or other industry where there are sustainability advantages to being located in close proximity to the market they serve”.

The proposal would not involve “industries and/or businesses which would be detrimental to local amenity if located in settlements, including on designated or allocated employment areas”. Indeed, there are many cases of container storage businesses operating successfully in urban settings without affecting detrimental amenity, albeit those sites require greater controls to manage impacts where residential occupants are nearby.

The applicants were previously requested to provide specific reasons for a container storage business in this location. An email was provided from a removals company based at West Raynham setting out that they struggle to find storage locally. Although this carries some limited weight, they do not provide 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 applicant’s case is that they do not own land on designated employment sites in Fakenham and they wish to create a container storage business on Raynham Estate land so that profits from the venture can be re-invested back into the estate to support its ongoing and long-term vitality and viability. The applicant views the wider Raynham Estate as a whole as a rural business comprising multiple business components that this proposal would help to sustain. Further information on the applicant’s supporting case is set out at Section 6.

Officers consider that there are 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.

Officers consider that the proposal would be regarded as a departure from this element of Policy E3.

In terms of Policy E3 1.(c) and assessment that “the development would not adversely affect highway safety.” Section 3 of the report considers matters of Highway Safety and concludes that the proposal would not result in unacceptable highway impacts.

Officers consider that the proposal would accord with this element of Policy E3.

Whilst the proposal would not likely result in unacceptable highway impacts, in other respects the proposal would be regarded as a departure from the aims of Local Plan Policy E3 1(a) and 1(b). The departure from Policy E3 would weigh against the grant of planning permission and would require material considerations in support of the proposal sufficient to justify a departure from the Development Plan.

3. Highways

The purpose of Local Plan Policy CC9 is to ensure that new development maximises the opportunities for the use of sustainable forms of transport appropriate to its particular location, that the public highway remains safe and convenient to use for all road users and that proposals are served by safe and suitable access without detriment to the amenity and character of the local area.

The purpose of Local Plan Policy HC7 is to ensure the provision of adequate safe and secure vehicle and cycle parking taking account of active travel objectives. Proposals should take account of the latest Norfolk County Council Parking Guidelines as a starting point, to ensure parking is integrated as a key element of design layouts, including the provision of electric vehicle charging infrastructure.

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.

Officers fully recognise that, given the nature of the proposal, users are expected to travel to and from the site by private vehicle rather than public transport.

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 nor 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 Policies CC9 and HC7.

4. Design, Landscape and Amenity

The purpose of Local Plan Policy ENV2 is to require development to respect and enhance local landscape character, settlement patterns and the relationship between settlements and their surroundings. Proposals should be assessed against the Landscape Character Assessment SPD and should be sympathetic to the key characteristics and valued features of

the area. Proposals should set out how the development will protect and conserve the defining qualities and distinctiveness of the Landscape Character Type.

The purpose of Local Plan Policy ENV6 is to maintain, protect and promote adequate living and working conditions to ensure that all occupants benefit from a good standard of amenity by considering a number of matters including, overlooking, overshadowing, loss of privacy and prevention of disturbance from odour, noise and artificial light pollution. The policy applies to all development proposals, where existing and/or future occupiers may have their standard of amenity affected.

The purpose of Local Plan Policy ENV8 is to provide a set of design principles that will result in a high quality of design and ensure the special character and qualities of the district are maintained and enhanced. The policy criteria sets the approach to a number of considerations including the public realm, green infrastructure, landscaping and service facilities, having regard to the North Norfolk Design Guide SPD.

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 and anaerobic digester 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 ENV2, ENV6 and ENV8.

5. Ecology

The purpose of Local Plan Policy ENV4 is to require the protection, enhancement and net gain for biodiversity and geodiversity. Proposals must avoid harm to designated sites and deliver measurable biodiversity net gain (BNG). The policy requires suitable ecological surveys to establish the extent of the potential impacts on ancient woodlands, veteran trees, protected species and priority species or priority habitats.

The purpose of Local Plan Policy CC10 is to ensure biodiversity net gain (BNG) is achieved in order to help protect and enhance the natural environment, which supports the overall long term adaptability and resilience to climate change. The policy requires qualifying development to achieve a minimum of 10% BNG over the pre-development biodiversity value as measured by the relevant biodiversity metric. A BNG strategy should accompany proposals that provides relevant and proportionate information, including biodiversity metric calculations and details of maintenance, and which demonstrate that the Mitigation Hierarchy has been followed and complies with the Biodiversity Gain Hierarchy.

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 Local Plan Policies ENV4 and CC10.

6. Material Considerations

On the 11 December 2025, the Development Committee resolved to **DEFER** the application to seek clarification from the applicant across two areas:

- i. information regarding farm diversification and how the application would support the estate; and
- ii. to see greater detail on the wider economic benefits to the district, specifically employment

Following the Committee resolution, an additional supporting statement dated 06 Feb 2026 has been provided, a copy of which is available at **Appendix 1**.

The applicant refers in their submission to changes in government policy in relation to movement away from traditional subsidy regimes which has created a structural funding gap that cannot realistically be replaced through agricultural production alone. The applicant refers to various factors making agricultural production increasingly challenging including volatile commodity prices, rising input costs (Fuel, fertiliser, labour and machinery), increasing regulatory and environmental compliance costs and reduced predictability of farm income driven by climate variability and more frequent extreme weather events.

The applicant has stated that income generated from the self storage facility "would provide a long-term, stable, reliable, non-agricultural income stream independent of weather, crop yields, or commodity prices".

The applicant has indicated that, once fully operational, they anticipate that the development would generate revenues of approximately £216,000 per annum, with a net profit of approximately £119,000. The applicant states his income would be re-invested into the Raynham Estate to support its long-term sustainability.

In terms of employment, the applicant originally stated in their application form that one Full Time Equivalent (FTE) post would be created as a result of the proposal.

Officers have verified the information provided by the applicant and have benchmarked the quoted profit figures against publicly available information for the storage facility at Wyman

Way. Assuming similar rental costs, the applicant's figures appear to be based on an approximate 70% occupancy rate for the storage containers (which means about 63 of the 212 containers would be vacant at any one time). The applicants figures appear to be reasonable and justified. A higher occupancy rate would therefore increase the income for the estate. Officers recognise that there are costs associated with setting up the facility with estimates that the containers alone would cost upwards of £500,000 to purchase and if that purchase is financed then this set up and running cost (including employment costs for the 1FTE) explains the net profit expected of approximately £119,000 per annum.

Officers note that the applicant would prefer the self-storage business not to be tied to the estate through S106 Obligation as this would, in their words, "frustrate this growth and limit the benefits which would be returned to the estate". Whilst it is not clear from the applicants statement precisely what this means, absent any controls being put in place should permission be granted, the Committee would have to rely on the applicants word that they would operate the business and re-invest profits into the wider estate.

In summary, whilst the container self-storage facility would only create one FTE employment opportunity, the net profit expected would provide an additional income stream to help with running the wider Raynham Estate and this is capable of attracting "significant" positive weight in the planning balance. However, absent controls to tie the business to the estate, then Officers advise that the weight to be attributed would need to be tempered to "moderate".

Other Matters

At the Development Committee meeting on 11 December 2025, a question was asked about biosecurity and the presence of the adjacent poultry unit. The applicant has since confirmed that "...there is an automatic barrier for entering the poultry site and bio-security measures in place, which include wheel and boot washing. There is clearly segregation between the entrances to the proposed self-storage site and the poultry site such that there is no operational overlap between the two and therefore no bio-security issues between the two."

Officers understand that Biosecurity in the UK is managed through a cross-government approach led by the Department for Environment, Food & Rural Affairs (Defra), with key operational delivery handled by the Animal and Plant Health Agency (APHA) and UK Health Security Agency (UKHSA). This is not a matter which the Local Planning Authority has agency to control and nor should be considered as a reason to refuse development.

7. Planning balance and conclusion

Whilst the proposal would not give rise to unacceptable impacts in relation to matters of highway safety, design, landscape, amenity and ecology (subject to the imposition of conditions), the location of a new employment development located in the designated countryside policy area would be contrary to the aims of Local Plan Policy E3 for the reasons set out in Section 2 of this report. The proposal is therefore considered as a departure from the Development Plan.

The proposal will create one full time equivalent post and the applicant has indicated that the project will deliver a net profit of circa £119,000 per annum to be re-invested back into the Raynham Estate. Officers consider this is capable of attracting moderate weight in the planning balance, absent specific controls tying the business to the estate.

In conclusion, Officers consider the proposal is finely balanced. Notwithstanding the departure from the Development Plan, in all other areas the proposal is considered acceptable and the material considerations identified are capable of attracting sufficient weight to justify the

departure from the Development Plan. The benefits would attract greater weight if they are secured via any planning permission.

RECOMMENDATION:

APPROVE subject to:

1. Securing a S106 Obligation to secure an off-site BNG monitoring fee; and

2. the imposition of the following summarised conditions:

- **Standard 3 Year Time Limit**
- **In accordance with approved plans / specifications**
- **Extent of permission (max number of containers and their use)**
- **Opening Hours**
- **Secure Access Scheme**
- **No outside storage beyond the containers**
- **External finish of the containers**
- **No external lighting unless details approved**
- **Measures in the Ecological Assessment**
- **Construction Environmental Management Plan (CEMP: Biodiversity)**
- **Landscape and Ecological Management Plan (LEMP)**
- **Hard and soft landscaping in accordance with approved details**
- **Biodiversity Net Gain Plan implementation**
- **Minimum one fire hydrant to be provided**
- **Surface Water Drainage details**

Final wording of conditions and any others considered necessary to be delegated to the Assistant Director – Planning