

**HIGH KELLING – PP/26/0186 - Residential development comprising 9 dwellings
(application for permission in principle) at Land Off Of Heathfield Road, High Kelling
Applicant: Mr M Forster**

**Minor Development
Target Date: 17th March 2026
Extension of Time:
Case Officer: Olivia Luckhurst
Permission in Principle**

RELEVANT PLANNING CONSTRAINTS

Landscape Character Assessment - Wooded Glacial Ridge
National Landscape - Norfolk Coast National Landscape (formerly AONB)
Rural Area
Small Growth Village

RELEVANT PLANNING HISTORY

None.

THE APPLICATION

Seeks permission in principle for a residential development comprising 9 dwellings.

REASONS FOR REFERRAL TO COMMITTEE

The application has been referred to committee at the request of Councillor Rouse for the following reason(s): Overdevelopment of High Kelling, increase in traffic movements and inadequate infrastructure to support the development.

PARISH/TOWN COUNCIL - Objection

The proposed development outside the NNDC Local Plan settlement boundary raises significant concerns due to narrow, unadopted access roads, Warren Road and Heathfield Close, unable to accommodate increased traffic from an anticipated 58 additional vehicle movements daily. Previous planning applications were rejected over safety issues at the dangerous Avenue junction with the A148, which struggles with high vehicle speeds and visibility. The site lacks sustainable access to local facilities, with no safe cycle paths and minimal public transport. The nine proposed dormer bungalows do not include affordable housing, failing to cater to community needs. The development contravenes Local Plan policies on access and vehicle reliance, while concerns about construction access were raised. The site is within a protected national area, warranting careful development consideration to preserve natural characteristics. Although the development aligns with the small growth classification, it diverges from existing linear development patterns. Approval would necessitate an external lighting plan to protect the area's dark skies.

Full comments can be found online at [PP/26/0186 | Residential development comprising 9 dwellings \(application for permission in principle\) | Land Off Of Heathfield Road High Kelling Norfolk](#)

Consultations:

Invitations to comment on the application were sent to the following;

Norfolk County Council Highways – Comments

The permission in principle consent route has two stages. The first ('permission in principle') stage establishes whether a site is suitable in-principle and the second ('technical details consent') stage is when the detailed development proposals are assessed. This application relates to the first of these two stages. The PPG outlines that the scope of the considerations for permission in principle is limited to location, land use and the amount of development permitted. From that perspective, the site is close to Holt, enclosed by existing development and would be considered sustainably located. All other matters are considered as part of a subsequent technical details consent application if permission in principle is granted. The specific details of access design, including visibility, and the effects of providing access on the amenity and character of the area would be a matter for assessment at technical details stage, at which time, the LHA would be likely to raise highway safety objections given the shortfall in visibility at highway intersections and the private nature of the access routes.

Landscape (NNDC) - Objection - The proposed development is set to impact designated sites, priority habitats such as hedgerows, and protected species, necessitating a Preliminary Ecological Appraisal (PEA) and, where required, an Ecological Impact Assessment (EclA) to thoroughly evaluate ecological implications in alignment with CIEEM guidelines and BS42020:2013. Arboricultural data indicates the removal of several trees, specifically G3 Sycamore, G4 bamboo, and G5 Sycamore & Oak, which are not significant to the landscape. However, proximity concerns regarding T16 Spruce and G6 Pine with a proposed no-dig surface raise issues about utility access and potential damage, particularly under Tree Preservation Order TPO/16/0917, which mandates that any loss to protected trees must be offset by demonstrable public benefits. The report has been criticised for not sufficiently addressing these preservation obligations, leading to objections, highlighting the need for a complete Tree Protection Plan (TPP) and Arboricultural Method Statement (AMS) prior to construction, alongside a construction management plan to regard potential impacts from vehicle access. The site, located within "The Norfolk Coast National Landscape," requires careful attention to conservation, characterised as a "Wooded Glacial Ridge" critical for local landscape integrity. Guidelines discourage major development that threatens wooded character, though the planned removal of some trees may not be significant enough to radically alter High Kelling's landscape. The village is classified for 9% growth, with the development of 20 additional dwellings fitting this rating, despite conflicting with local linear development norms. Surrounding residential properties serve to mitigate this. Should the development advance, an external lighting scheme must preserve dark skies, adhering strictly to best practice recommendations.

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Ward Councillor - Objection - Overdevelopment of High Kelling, increase in traffic movements and inadequate infrastructure to support the development.

REPRESENTATIONS:

Public consultation of the application took place for a period of 21 days between 11.02.2026 and 06.03.2026. Forty-three letters of **objection** have been received and raise the following issues:

- Heathfield Road, Avenue Road and Pine Heath Road are wide enough to enable two cars passing each other although only with difficulty
- Access Appraisal Document 1007.0028/AATN/3 states Avenue Road has a 30mph speed limit which is incorrect, it has a 10mph limit
- Unacceptable increase in vehicular movements
- Pineheath Road would be inappropriate as an access road to Avenue Road
- Impact on wildlife
- Heathfield Road does not have a width of 5.4m as stated within the submission and has not foot paths
- Avenue Road was not constructed to adopted road standards and is unlit
- Poor visibility from the access of Avenue Road to the A148
- Alternative access via Pineheath Road has better sight lines both ways but involves four sharp bends not designed for lorries
- The site is land locked with no existing road
- Construction vehicles would struggle to get access the site
- Impact on dark skies
- Significant visual harm to the locality and character of the area
- Added pressure to the ageing drainage system which is considered to be of a poor standards and has been susceptible to blockage and has not capacity for additional dwellings to be added.
- The site could be considered as greenfield given its historic use of grazing land and not brownfield as suggested by the supporting details
- Overdevelopment of the site
- The village plan within the Local Plan states that a provision of 20 new houses can be provided however, 6no. dwellings have already been built at Warren Farm Barns and permission has also been granted for 35no. dwellings at old Pineheath Care Home, therefore there is double the suggested number.
- Detrimental impact on the Norfolk Coast National Landscape

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 Local Plan (adopted December 2025)

SS1 - Spatial Strategy

SS2 - Development in the Countryside

CC12 - Trees, Hedgerows & Woodland

CC13 - Protecting Environmental Quality

HC7 - Parking Provision

ENV1 - Norfolk Coast National Landscape & The Broads

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

ENV8 - High Quality Design

National Planning Policy Framework (NPPF):

Section 2 - Achieving sustainable development

Section 4 - Decision-making

Section 5 - Delivering a sufficient supply of homes

Section 8 - Promoting healthy and safe communities

Section 12 - Achieving well-designed places

Section 15 - Conserving and enhancing the natural environment

Officer Assessment:

Main issues for consideration

- 1. Background and context**
- 2. Site and Application**
- 3. Principle of Development**
- 4. Affordable Housing and Mix**
- 5. Location**
- 6. Use**
- 7. Amount of Development**
- 8. Other Matters**
- 9. Planning Balance and Conclusion**

1. Background and context

The application is for "Permission in Principle". This is an alternative way of obtaining planning permission for housing-led development which separates the consideration of

matters of the principle for proposed development from the technical detail of the development. The permission in principle consent route has 2 stages: the first stage (or permission in principle stage as is being considered now) establishes whether a site is suitable in-principle, and the second ('technical details consent') stage is when the detailed development proposals are assessed. It is not possible for conditions to be attached to a grant of permission in principle and it may only consider:

- the site location,
- the type of development and
- amount of development.

2. Site and Application

The site for the proposed development is bordered on three sides by the residential cul-de-sacs of Heathfield Road, Warren Close, and Heathfield Close. Currently, the area is overgrown with brambles and trees and has been historically utilised for grazing purposes. The application seeks to construct nine new dwellings with access provided through the extension of Heathfield Road.

3. Principle of Development

The application site is located outside of but immediately adjacent to the settlement boundary of High Kelling which is classified as a Small Growth Village within Policy SS1 of the adopted North Norfolk Local Plan. A small amount of development will be focused in and adjacent to the defined Small Growth Villages reflecting their limited service role to help address housing needs and support vitality and sustainability across the rural area.

Table 3 'Small Growth Villages - Indicative Growth Figures' present an indicative growth figure for each settlement rather than a specific requirement. The indicative growth figures in Table 3 are derived from applying a percentage uplift to the published ONS population data for each parish divided by average household size of 2.3 (not the number of existing dwellings in a village). For High Kelling, the table confirms that a total of 20no. new dwellings can be provided.

The current application seeks to establish nine dwellings in High Kelling. It is important to note that whilst permission has recently been granted for 35 dwellings at the former Pineheath Care Home, this approval occurred before the adoption of the new Local Plan, meaning these units do not contribute to the Indicative Growth Figures for the area.

Overall, the proposal is deemed acceptable and aligns with Policy SS1.

4. Affordable Housing and Mix

The application site is located within High Kelling which is classified as a North Norfolk Designated Rural Area and is positioned within Affordable Housing Zone 2 according to Policy HOU 2 which states 'all new housing developments, including those for the conversion of existing buildings, shall provide for a mix of house types, sizes and tenures.

According to the classification of the sites and in line with policy HOU 2, a minimum of 35% of the proposed units must be affordable, or alternatively, a financial contribution is required.

In this case the requirement would be for 3.15 affordable dwellings comprising 3 whole units plus a financial contribution for the remainder.

In addition, 25% of the affordable units should be Intermediate Housing with the remainder made as Rented accommodation in a mix comprising one, two and three beds with the majority consisting of two beds.

The Planning Statement submitted with this application verifies that the proposal will meet the criteria of Policy HOU 2 regarding the provision of affordable units and housing diversity.

Should approval be granted, the affordable housing and mix will be secured within a S106 Obligation at the technical details consent stage.

5. Location

The assessment of the site's location focuses on its suitability for housing in accordance with the principles outlined in Policy SS1 of the Local Plan. The application site is situated immediately adjacent to the settlement boundary of High Kelling, classified as a Small Growth Village under this policy, which delineates the Spatial Strategy for the district.

Policy SS1 indicates that most new development will occur in larger towns and villages, considering their roles as centres for employment, retail, and services, as well as their capacity for sustainable growth. Nonetheless, outside of the defined boundaries of Small Growth Villages residential development will be permitted subject to certain criteria being met:

- The site is immediately adjacent to the defined Settlement Boundary of High Kelling
- The number of dwellings proposed (nine) does not exceed the indicative growth figure for the settlement;
- The proposal is considered small scale, incremental growth which is broadly compatible with the form and character of the village and its landscape setting. Further assessment in terms of siting, scale, design, impact on heritage assets and historic character would be assessed at technical details consent stage;

Despite not being on previously developed land, the infill nature of the proposal within a residential context aligns with the policy's provisions, supporting the case for residential development on the site.

6. Use

The two key considerations regarding the proposed use of the site are the potential loss of agricultural land and the compatibility of new residential development with existing land uses. Currently, the site is vacant and appears neglected, surrounded by residential properties to the east, south, and west. The site is also situated in the Norfolk Coast National Landscape and is classified as Wooded Glacial Ridge within the North Norfolk Landscape Character Assessment which states "this high level wooded glacial ridge extends from west of Holt to Cromer and is a distinctive landmark feature on the skyline within the District, influencing neighbouring landscape types."

Woodland serves as the primary land cover and is recognised as a valued characteristic of this landscape type. Recommendations for improving the Wooded Glacial Ridge type include refraining from significant development to preserve the wooded essence, the skyline, and the feelings of seclusion, tranquillity, and dark night skies, which are also acknowledged attributes of the Norfolk Coast National Landscape. The proposed application will lead to tree loss on the site, therefore failing to illustrate how the proposal will enhance the woodland landscape type. Nevertheless, the removal of vegetation on the site is not deemed significant in terms of scale or species, and the Landscape section believes that the overall wooded character of High Kelling will not be notably affected. The site also lies adjacent to the established residential area of High Kelling and cannot be considered as prominent in the landscape, as existing housing borders the eastern, southern, and western sides of the site. Therefore, it is considered that the site is effectively surrounded on three sides by the current residential properties along Heathfield Road, Heathfield Close, Warren Close, and Warren Road.

The design of the scheme does not easily align with the linear development pattern in the area and may be viewed as being out of keeping with the existing built form, however, considering the enclosed nature of the site within the settlement, the proposal is not considered to be contrary to Policy ENV2.

Overall, the size of the plot is deemed adequate to support the proposed development without adversely affecting the residential amenity of neighbouring homes or negatively impacting the Norfolk Coast National Landscape. By carefully addressing aspects such as scale, design, and layout, the proposal could mitigate issues such as overlooking and loss of light while still ensuring there is ample amenity space for future residents. Further information would be required in relation to protected trees and the impact that their loss could have on the character of the area.

7. Amount of Development

Policy ENV8 states that “All development proposals will seek to achieve an integrated design approach that reflects the characteristics of the site, respects the distinctive 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.”

Policy ENV6 states ‘All new development will provide for a high standard of amenity including adequate living and working conditions. This standard should be achieved and maintained without preventing or unreasonably restricting the continued operation of established authorised uses and activities on adjacent sites’.

The design is expected to harmonise with the existing architectural landscape. Additionally, it is anticipated that the site can accommodate this number of homes while ensuring sufficient distance from adjacent properties. Whilst the proposed development is considered acceptable in principle, it is crucial that the technical details demonstrate compliance with all relevant design standards outlined in the NPPF, Local Plan, and other applicable guidelines.

8. Other Matters

Highways

Concerns have been expressed by the Parish Council, local residents, and the Highway Authority regarding the connection of the site to Heathfield Road and the utilisation of the existing access from Avenue Road. The Highway Authority has indicated that they are likely to raise issues related to highway safety due to inadequate visibility at intersections and the

private nature of the access routes. However, according to the Planning Practice Guidance (PPG), the considerations for granting permission in principle are restricted to factors such as location, land use, and the extent of development allowed. Consequently, highway safety concerns will need to be addressed during the technical details stage and will not affect the decision on the current application.

Trees

Arboricultural information has been provided by Oakfield Arb reference OAS 25-483-AR01 dated Jan '26. The report sets out the indicative layout will result in G3 Sycamore, G4 bamboo and G5 Sycamore & Oak being removed. G3 and G5 are noted to be "self-set small trees with no significant contribution in both arboricultural and landscape terms".

The main access at Heathfield Road is very close to T16 Spruce, and some of G6, Pine. A no dig surface is proposed to be laid to prevent damage to these trees. This may be acceptable for the access road; however, it fails to address how utilities will be brought onto site at the singular point of access that is no-dig. Its foreseeable damage will occur at this entrance; therefore, further information would be required at full technical details stage.

In addition, a Tree Protection Plan and Arboricultural Method Statement would be required that evidence how the public benefit of the development could outweigh the loss of the trees or how the loss of trees will be mitigated, which in turn will need to be factored into the future consideration of Biodiversity Net Gain (BNG).

9. Planning Balance and Recommendation

The site is considered appropriate for the development of 9no. dwellings in principle, and the proposal aligns with the requirements of the Local Plan. There are no significant factors suggesting that the application should be determined otherwise. Consequently, approval is recommended.

RECOMMENDATION:

Approval of Permission in Principle for up to 9 dwellings