FAKENHAM – PF/26/0688 - Installation of new ATM in part of existing ground floor window opening, and accessible ramp with railings at 14 Market Place, Fakenham. Applicant: Mr P Williams

Full Planning Permission
Target Date: 26.06.2026
Extension of time23.07.2026
Case Officer: Nicola Wray

RELEVANT SITE CONSTRAINTS:

Within Settlement Boundary of Fakenham
Town Centre Area (Fakenham)
Grade II Listed Building
Conservation Area - Fakenham
Primary Shopping Area
Primary Retail Frontage

RELEVANT PLANNING HISTORY:

PF/00/1548 Refused – Refusal upheld at Appeal
Insertion of an Automatic Teller Machine

LA/00/1570 Refused - upheld at Appeal
Insertion of an Automatic Teller Machine

LA/26/0603 Approved 12.05.2026
Installation of defibrillator and bleed kit cabinets to external wall of building

ADV/26/0689 Pending Consideration
Internally illuminated ATM Collar

LA/26/0696 Pending Consideration
Installation of ATM, accessible ramp with a railing, internally illuminated ATM signage, and associated works

THE APPLICATION
14 Market Place is a Grade II Listed Building set within Fakenham Conservation Area and the Town Centre. This application seeks planning permission to install an ATM in part of the existing ground floor window opening, and an accessible ramp with railings. The application is accompanied by relevant listed building and advertisement applications, which are reported concurrently to this meeting.

REASONS FOR REFERRAL TO COMMITTEE:
Cllr Vickers and Cllr Punchard were contacted as the application's recommendation is contrary to the view of the Town Council. Cllr Vickers confirmed she would be calling the application to Development Committee on the basis of public benefit and public support for the application.

Cllr Punchard supports this stance.

REPRESENTATIONS:
One representation have been received in **support** of this application. The comment has been summarised below:

- A 24 hours ATM will provide a much needed facility and encourage people back into the town.
- The previous application in 2000 was refused due to its position in a Conservation Area, but until recently there were 3 ATMs all in Conservation Areas

CONSULTATIONS:

Ward Councillors – See above call-in request, Cllr Vickers and Cllr Punchard have voiced support for the proposal

Fakenham Town Council – **Support**
A further statement was also submitted later by the Town Council requesting that its view as the democratically elected representative body for local residents, be given significant weight and that every effort be made to facilitate the installation of this important facility.

Conservation and Design – **Objection**
The previous scheme only involved installing an ATM, this revised scheme would be inherently more impactful and result in greater harm to the character and appearance of the listed heritage asset.

Norfolk County Council Highways - Comments
The ATM would be feasible and not considered to affect the public highway. The formation of the ramp would require the removal of highway rights to the affected area, which would need to be applied for with no guarantee of approval.

HUMAN RIGHTS IMPLICATIONS
It is considered that the proposed development may raise issues relevant to

Article 8: The Right to respect for private and family life.
Article 1 of the First Protocol: The right to peaceful enjoyment of possessions.

Having considered the likely impact on an individual's Human Rights, and the general interest of the public, refusal of this application as recommended is considered to be justified, proportionate and in accordance with planning law.

CRIME AND DISORDER ACT 1998 - SECTION 17
The installation of an external facing ATM machine has the potential to increase the likelihood of crime taking place (theft/fraud) at the ATM machine itself or in close proximity, especially in the evening and in the dark. The presence of the ATM also increases the opportunity for physical theft of the ATM machine itself via organised crime, which has the potential to lead to significant damage to the heritage asset.

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
Policy CC1: Delivering Climate Resilient Sustainable Growth
Policy E4: Retail & Town Centre Development
Policy E5: Signage & Shopfronts
Policy ENV6: Protection of Amenity
Policy ENV7: Protecting & Enhancing the Historic Environment
Policy ENV8: High Quality Design
Policy HC3: Provision & Retention of Local Facilities
Policy HC7: Parking Provision
Policy SS1: Spatial Strategy

<u>Material Considerations</u>

National Planning Policy Framework (NPPF):
Chapter 2: Achieving sustainable development
Chapter 4: Decision-making
Chapter 6: Building a strong, competitive economy
Chapter 7: Ensuring the vitality of town centres
Chapter 8: Promoting healthy and safe communities
Chapter 9: Promoting sustainable transport
Chapter 12: Achieving well-designed places
Chapter 15: Conserving and enhancing the natural environment
Chapter 16: Conserving and enhancing the historic environment

Supplementary Planning Documents and Guidance:
North Norfolk Design Guide Supplementary Planning Document (SPD) (December 2008)

OFFICER ASSESSMENT:

Main issues for consideration:
1. **Background**
2. **Principle**
3. **Design**
4. **Impact on Heritage Assets**
5. **Amenity**
6. **Highways**
7. **Town Centre Impacts**

1. Background

In 2000, planning permission and listed building consent were sought to install an Automatic Teller Machine (ATM) within the front elevation of the Grade II Listed Building, also being used as Nationwide Bank at the time.

The proposal included the removal of the furthest left lower sash window and the installation of the ATM.

The Local Planning Authority, through a Development Committee Decision, decided to refuse planning permission and listed building consent, giving the following reasons:

"*The character and appearance of the Grade II Listed Building and the Conservation Area will be severely damaged by the installation of the proposed ATM machine. The balance of the Georgian elevations will be distorted and one sash window will be lost*.".

This decision was upheld by the Planning Inspector on appeal who cited in his conclusion that "*The appeal premises are a prominent feature in a recently enhanced pedestrian open space. The strong symmetry of the building and the fine detailing of the construction would be eroded by the removal of one sash and the insertion of the automatic teller machine. Whilst the works would be reversible, I consider that this is unlikely to occur in the foreseeable future and in the meantime the proposed works would fail to preserve the listed building and its special architectural features and would not preserve the character or appearance of the conservation area*."

Officers consider that the previous Inspector's decision is capable of being a material planning consideration, the weight to be afforded to it is a matter for the decision maker, in this case the Development Committee. It is also recognised that some 20 plus years have elapsed since that appeal decision, the proposal related to the lefthand lower window (the current application related to the right hand lower window) and, with the closure of other banks in the Town, the overall context of the scheme has materially changed with different Local Plan Policy considerations together with the NPPF. As such, Officers consider that only limited weight should be afforded to that appeal decision.

2. Principle

Fakenham is classified as a Large Growth Town where the majority of new development is expected to be located.

The purpose of Local Plan Policy E4 is to enhance the vitality and sustainability of town centres and encourage local sustainable shopping patterns.

This application is for the siting of an Automatic Teller Machine (ATM) and an accessible ramp, within the town centre at 14 Market Place, which currently functions as a bank (Nationwide) with internal ATM facilities available during business hours.

At present, the Nationwide branch in question is open 9:30am to 4:30pm Monday, Tuesday, Thursday and Friday, 10am to 4:30pm on Wednesdays and closed all weekend. The proposal would therefore allow for the withdrawal of cash outside of these hours.

Officers note that many banks have closed down in Fakenham over recent years including Lloyds, Barclays and Natwest and the nearest available external ATM to withdraw cash has been identified as being at Tesco, some 0.3 miles further down the road of Oak Street, albeit still within the designated Primary Shopping Area of Fakenham. Cash withdrawals can also be made at the Post Office in close proximity but only during usual business opening hours.

Other cashpoints are available but these are all located well outside of Fakenham Town Centre and not located within easy or convenient walking distance of the town centre.

It is understood that Fakenham previously benefitted from four externally accessible ATM's prior to the closure of many of the banks. Fakenham Town Council have also made it very clear that Nationwide is the sole remaining bank within Fakenham and have indicated that access to cash would also allow for that cash to be used locally, thereby aiding in the local economy.

Officers recognise anecdotally that, as a society, the demand for access to cash has lessened over recent years allied with a wider push towards a cashless society through digital / mobile banking. This has also been accelerated to some degree by banking closures up and down the country and greater online shopping habits of consumers. Nonetheless, some businesses do still depend on cash and some residents prefer to use cash, especially when managing tight budgets. Ultimately, if customers cannot access cash to pay for goods and services then transactions may not occur which has the potential to harm the vitality and viability of the Town Centre through reduced turnover and footfall. This would need to be weighed in the planning balance

The proposal would help support the vitality and viability of Fakenham Town Centre and would accord with Local Plan Policy E4. As such, it would be considered acceptable in principle subject to compliance with other relevant Local Plan policies.

3. Design

The purpose of 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 and service facilities, having regard to the North Norfolk Design Guide SPD.

The building is located within the Fakenham Conservation Area and would affect the front elevation of a Grade II Listed Georgian Building.

The proposal would be highly visible within the town centre due to the open views across the conservation area to the front of the listed building. The perfunctory design of the proposals is generally in keeping with the town centre commercial character. The proposals would enable disabled access, and offer accessible banking services at any time in the town centre.

One of the requirements of Policy ENV8 is that development proposals demonstrate a high quality of design that contributes positively to the public realm and public open spaces. As noted above, in the earlier appeal decision the Inspector considered that the openness of this area of the conservation area and town centre is a particularly important characteristic of the area, and further that the front façade of the building is a prominent feature within that space. As noted above, the Inspector dismissed the appeal because of it's significant adverse impact on the symmetry of the building from both long and short range views.

What is important to note is that the Planning Inspector's consideration was given to solely to the ATM, in this case the interruption of the openness would be increased due to the introduction of the accessibility ramp as well as the ATM, thereby increasing the invasive elements on the front elevation from that appeal decision.

Whilst the specific impacts upon the designated heritage assets are to be addressed below, and the design of the proposals is considered to be broadly in keeping, it is the siting of the ATM and associated ramp that is considered to be harmful to the wider area by virtue of a non-symmetrical addition of mass in an otherwise prominent and open area.

The application is considered to be contrary to the aims of Local Plan Policy ENV8 and this would need to be weighed in the planning balance.

4. Impact on Heritage Assets

The purpose of Local Plan Policy ENV7 is to protect and where possible, enhance the significance of heritage assets, whilst recognising the opportunities for sympathetic reuse and regeneration. The policy provides specific criteria for designated and non-designated heritage assets, conservation areas, archaeology and heritage at risk.

The property in question is Grade II listed and within the Fakenham Conservation Area.

With this application, Officers consider that the heritage balance lays between the need to protect heritage assets whilst recognising the increase in local service provision to meet the changing needs of the community together with enhanced disabled access.

Members are reminded of the great weight afforded to protecting heritage assets under Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, through Local Plan Policy ENV 7 and through the National Planning Policy Framework.

Heritage England Guidance (Easy Access to Historic Buildings, 2015) confirms that the "need to conserve the special characteristics of historic buildings is recognised within Approved Document M" under the Building Regulations.

Approved Document M itself states:

"*The need to conserve the special characteristics of such historic buildings must be recognised. They are a finite resource with cultural importance. In such work the aim should be to improve accessibility where and to the extent that it is practically possible, always provided that the work does not prejudice the character of the historic building, or increase the risk of long-term deterioration to the building fabric or fittings.".*

It is important to note that paragraph 212 of the National Planning Policy Framework (NPPF) requires Local Planning Authorities to give great weight to the conservation of heritage assets. Conservation and Design Officers have objected to the proposal citing that the proposal would result in harm to designated heritage assets - both the host property and the wider Fakenham Conservation Area.

Paragraph 215 of the NPPF provides that "*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use*.".

Conservation and Design Officers have raised an objection to the scheme, finding the proposals create harm to the heritage assets for the following reasons:

1. *Installing the ATM would result in the removal of the righthand lower sash window and its relocation to storage. Whilst theoretically then reversible, there is always an inherent risk associated with fixtures being set aside indefinitely for reuse.*

2. *As touched on by the inspector, the significance of the host building is derived from its balanced and homogenous Georgian proportions and detailing. Clearly the proposed alterations would undermine this refined symmetry and coherent appearance.*

3. *As shown, the proposed ramp would butt up directly to the base of the building and thus would potentially trap moisture within its historic fabric (assuming it will likely be formed in concrete). With it also seemingly obstructing the basement grill, a potentially valuable ventilation route could be lost along with the associated evidential value.*

4. *The building stands prominently within the core of the Fakenham Conservation Area and makes a significant contribution to framing its Market Place. Therefore, with the utilitarian ramp appearing to project out into the public realm, and thus compromising the building's clean lines and direct connection to the formal space, additional harm would also be caused to the wider designation.*

The Development Committee, as decision maker, will need consider the **public benefits** that would result from the development against the identified heritage harm. The applicant confirms the benefits to be;

a) Restoration of convenient public access to essential banking services out of hours
b) Maintain accessible cash facilities, which is important for residents, local businesses and visitors.
c) Positive contribution to the town's economic vitality
d) Provide an accessible means of reaching an ATM.

Officers acknowledge that Nationwide is the sole remaining bank within Fakenham Town Centre. The proposed ATM would allow for a second place to access cash for the community within the Town Centre (the other being Tesco on Oak Street) when the Nationwide Bank is not open.

Other ATM's are located outside the town centre at Morrisons and the Shell garage, both of which are over a mile away, the Shell garage is 2 miles and Morrisons is 1.3 miles away.

In defining the planning balance in terms of heritage matters officers have also afforded some weight to the previous appeal decision (noted above), finding that the current proposals add further heritage harm to the dismissed appeal by the addition of the accessibility ramp.

Extensive discussions have been held with the applicant around alternative provisions to install an ATM that may not affect the most sensitive elevation of the building, but no revision has been possible. This included exploring moving the ATM to the left hand side of the building frontage, but this was not possible due to internal layout of the building.

In respect of other material considerations, the Development Committee should also be aware that there has been a recent approval to install a defibrillator and bleed kit to the front façade. Whilst some harm was identified from this alteration, the public benefits from this clearly outweighed the much more limited heritage harm. The defibrillator and bleed kit are significantly smaller and less obtrusive additions than the proposal being considered under this application.

On balance, Officers consider that the proposal will result in “less that substantial” heritage harm. This harm will need to be weighed in the planning balance against the public benefits of the proposal.

5. Amenity

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 proposal is not considered to result in unacceptable impacts upon the living or working conditions of neighbouring occupants and would comply with Policy ENV6.

6. 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.

Highways Officers have been consulted on the application and have broken their assessment into two separate elements. The ATM, and the accessible ramp.

Highway Officers have confirmed they have no objection to the ATM. With regards to the ramp, they have advised that the presence of the ramp would be considered obstructive under The Highways Act 1980 and the only way that the proposal could go ahead would be for the developer to apply to the Department for Transport (DfT) for a Stopping Up Order under Section 247 of the Town and Country Planning Act and this may well make the proposal unachievable.

Whilst no objection has been formally lodged, Officers have advised that a Grampian style condition would have to be imposed preventing any development until approval has been granted by the Department for Transport (DfT). Whilst the proposal would comply with

Policy, this would only be the case that the DfT grants the Stopping Up Order, so it is understood that the Highways matter remains a large obstacle to the proposal, which may not be overcome. Absent a Stopping Up Order, the highway matters would weigh against the grant of planning permission.

7. Town Centre Impacts

As set out above, Local Plan Policy E4 seeks to enhance the vitality and sustainability of town centres and encourage local sustainable shopping patterns. The provision of a second ATM within the Primary Shopping Area of Fakenham would undeniably help contribute towards the vitality and viability of Fakenham, which is designated as a large Town Centre and a main focus for retail and leisure development.

Policy E4 also provides that development will only be supported where it "*respects the character of the centre, including its special architectural and historic interests and assists in maintaining its existing retail function*."

The conservation area and heritage assets within Fakenham Town Centre undoubtedly play an important role in the vitality and sustainability of the town and so too does having an economically active and viable town centre in which shops and services can survive, which are vital in helping secure heritage assets.

On balance, in light of the heritage harm identified through the ATM and ramp, and with a standing objection from the Conservation and Design Officers, Officers consider that the proposal would be considered contrary to Policy E4 and this would need to be weighed in the planning balance.

Planning Balance and Conclusion:

This applicant hinges on an assessment of the public benefits of the proposal versus the heritage harm that would result from the proposal on a grade II listed building in a conservation area.

Officers have carefully assed the benefits arising from the application and where possible have afforded positive weight to these aspects.

The applicant (Nationwide) has publicly committed to keeping every single one of its 605 branches open until at least the start of 2030. This means that the Fakenham branch is expected to remain open for at least a further 42 months (circa 3.5 years) but in theory this could be extended, if the bank chooses to do so. Within that context, any permission for an ATM could be regarded as more temporary in nature and this certainly would temper any weight to be afforded to the public benefits of the proposal. Conversely, the works to the listed building could result in permanent damage and harm to the grade II listed heritage asset through alterations to the fabric.

Officers note that the harm arising to heritage assets is considerable and note consideration of broadly similar proposals under a previous appeal. Officers guide members that significant weight must be given to the protection of heritage assets and weight should be afforded to the previous appeal decision.

The level of harm to the heritage assets carries great weight and is not otherwise outweighed by the wider community benefits that the proposals may otherwise deliver. As such the application is contrary to Policy ENV7 of the adopted North Norfolk Local Plan, as well as paragraph 215 of the NPPF and ss16(2), 66(1) and 72(1) of the Planning (Listed Buildings & Conservation Areas) Act, 1990.

For the reasons given above the proposed development is not considered to be in accordance with the aims of the key Local Plan Policies as set out above. There are no material considerations that indicate the application should be determined otherwise. Refusal is therefore recommended.

RECOMMENDATION:

REFUSAL for the following reasons:

1. The impact and protrusion of the proposal into the open space in front of it, combined with the identified heritage harm mean that the proposal is considered to be contrary to Local Plan Policy ENV7 and Policy ENV8 through its failure to preserve or enhance the designated heritage assets and historic environment.

2. The resultant impact of the ATM and the accessible ramp would interfere with the symmetry of the front elevation of the affected Grade II Listed Building, a feature that gains its significance from its balanced proportions and detailing, thereby resulting in harm to the designated heritage asset. The proposal is therefore considered to be contrary to Local Plan Policy ENV7 as it would fail to preserve or enhance the designated heritage asset.

3. The proposal would obscure features of architectural or historical interest and is uncharacteristic of a buildings design and so conflicts with the aims of Local Plan Policy E4 and E5.

Final wording to be delegated to the Assistant Director – Planning