

**AGENDA ITEM NO: 9/3(d)**

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| <b>Parish:</b>       | <b>Terrington St Clement</b>                                                                      |                                                                                                                      |
| <b>Proposal:</b>     | <b>OUTLINE APPLICATION: Outline permission for up to 4 self-build/custom build plots</b>          |                                                                                                                      |
| <b>Location:</b>     | <b>Land W of 74 And S of 79 To 83 Hay Green Road South Terrington St Clement Norfolk PE34 4PU</b> |                                                                                                                      |
| <b>Applicant:</b>    | <b>Lesley Lewis</b>                                                                               |                                                                                                                      |
| <b>Case No:</b>      | <b>26/00559/O (Outline Application)</b>                                                           |                                                                                                                      |
| <b>Case Officer:</b> | <b>Mr K Wilkinson</b>                                                                             | <b>Date for Determination:</b><br><b>3 June 2026</b><br><b>Extension of Time Expiry Date:</b><br><b>31 July 2026</b> |

**Reason for Referral to Planning Committee** – Referred to the Planning Committee for determination at the request of Cllr Paul Kunes.

**Neighbourhood Plan:** No

### **Case Summary**

The proposal is for outline planning permission (all matters reserved other than access) for the erection of up to 4 no. self-build/custom build dwellings, on land on the NW edge of the hamlet of Hay Green in the parish of Terrington St Clement, and approx. 450m south of the A17. The site lies outside the development area defined in the Local Plan and is therefore classed as 'countryside'.

The site consists of a 0.45ha parcel of grassland which is bounded by a land drainage ditch plus some scattered trees to the western, southern and eastern boundaries. The northern boundary fronts onto Hay Green Road South. There is agricultural land to the south and west, a detached house and associated commercial yard and buildings (DG Scales Plant Hire Ltd) to the east and ribbon residential development opposite/north.

In terms of constraints, the site lies in Flood Zones 2 & 3A plus Tidal Hazard Mapping Zone of EA's mapping; is classed as Grade 1 agricultural land; and within an impact zone of a SSSI.

The application is accompanied by a site-specific Flood Risk Assessment, Preliminary Ecological Appraisal, shadow Habitat Regulations Assessment, Arboricultural Impact Assessment, Highways Statement, Contaminated Land Screening Assessment Form and Planning & Sustainability Statement.

### **Key Issues**

Principle of development  
Impact on character and appearance of countryside  
Impact on neighbour amenity  
Highway issues  
Flood risk and drainage

Ecology/Biodiversity

Any other matters requiring consideration prior to determination of the application

### **Recommendation**

**REFUSE**

## **THE APPLICATION**

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In terms of constraints, the site lies in Flood Zones 2 & 3A plus Tidal Hazard Mapping Zone of EA's mapping; is classed as Grade 1 agricultural land; and within an impact zone of a SSSI.

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## **APPLICANT/AGENT SUPPORTING CASE**

The following statement in support of the development has been submitted by the agent:

**"Location / Requirement for self-build** - King's Lynn & West Norfolk has significant under supply of self-build plots - 141 (March 2026) showing continuous shortfall since 2016.

There are legal obligations on the Council to grant sufficient permissions to meet their shortfall. There is therefore a need to provide more self-build dwellings than accounted for. The four plots would provide additional self-build toward the shortfall.

The site is immediately opposite the defined Hay Green Settlement Boundary where permission for two new dwellings has just been granted (27th Feb 2026). The site has road frontage housing opposite, including the recent approved housing, facing directly toward the site. There is housing immediately to the east of the site.

The site is in Terrington St. Clement Parish, the village of Terrington St Clement just 1km to north of the site is accessible by bike / foot or 5-minute car journey. Terrington St. Clement has a primary school, high school, village hall, doctors' surgery, supermarkets, pubs and restaurants and many other services and facilities. Bus stops in easy reach of the site provide a daily service (6 buses per day) between King's Lynn and the Walpoles.

King's Lynn is a 20 min bus journey, or 10-15 min car journey.

**Impact upon the rural area** – The contained site is a small parcel of land not suitable for agricultural purposes due to its limited size. The site is seen against a backdrop of residential development to the north and east therefore impact on views in this direction are reduced.

The application is outline for up to four units, all matters other than access reserved, details of appearance, landscaping, layout and scale can be considered as reserved matters and ensure impact on the rural character is minimised.

**Ecology** - Additional surveys identified in the Ecological Appraisal (PEA) have been carried out, and results submitted: site not suitable for GCN; botanical surveys results submitted; 2 of the 3 water vole surveys complete – file note submitted confirming the site has historical water vole use, but no indication of presence currently.

**Flood risk and drainage** – the FRA identifies the site at a low risk of flooding from all sources except tidal flooding which is considered 'LOW' to 'MEDIUM' risk. This risk is associated with tidal flood plain of the River Great Ouse during a breach scenario within the flood defences. Flood mitigation detailed in the FRA, along with full details of surface and foul water drainage can be conditioned. Formal approval is currently being sought from the King's Lynn Internal Drainage Board under Byelaw 3.

The proposed development would help the Council meet its legal requirement for self-build development and in all respects the scheme is considered an acceptable form of development in planning terms that should be approved without delay."

## **PLANNING HISTORY**

None relevant

## **RESPONSE TO CONSULTATION**

**Parish Council:** No response at the time of writing this report.

**Highways Authority: NO OBJECTION** - Having visited the site and examined the information submitted with the application it is believed that ultimately accesses for the proposal would be safe and parking with turning for vehicles could ultimately be achieved.

The proposed development site is however remote from schooling; town centre shopping, health provision and has restricted employment opportunities with limited scope for improving access by foot (no footways) and public transport. The distance from service centre provision precludes any realistic opportunity of encouraging a modal shift away from the private car towards public transport.

It is the view of the Highway Authority that the proposed development is likely to conflict with the aims of transport sustainable development, and you may wish to consider this point within your overall assessment of the site.

However, if minded to approve, conditions suggested covering access construction in accordance with highways specifications, no gates without permission, plus a 2.4m parallel visibility splay.

**Internal Drainage Board: NO OBJECTION** – byelaw issues apply.

**District Emergency Planning Officer: NO OBJECTION** - because of its location in an area at risk of flooding, suggest that the occupiers should sign up to the Environment Agency flood warning system and produce a flood evacuation plan.

**Historic Environment Services: NO OBJECTION** subject to a suite of conditions securing archaeological mitigatory work.

**Environmental Health & Housing – Environmental Quality: NO OBJECTION**

**Norfolk Constabulary: NO OBJECTION** – advice offered regarding pursuit of Secured by Design accreditation.

**Arboricultural Officer: NO OBJECTION** - The application is supported by an arboricultural report, and it is encouraging to see that existing trees have been considered at an early stage. The trees identified for retention are generally of limited arboricultural and landscape significance and, subject to appropriate protection measures during construction, there is no objection on arboricultural grounds.

From a landscape perspective, the site occupies a distinctly rural location surrounded by open agricultural land. The existing trees within and adjacent to the site make only a limited contribution to the wider landscape character, which is instead defined by expansive views across the fenland landscape and the sparse pattern of development along Hay Green Road.

Whilst I am unable to sustain a landscape objection based solely on the trees present, it is worth noting that the proposal would introduce a relatively substantial new area of development into what is currently a predominantly undeveloped part of the countryside. The site lies remote from established built form and services, and the proposal would represent a notable extension of development into an established rural setting.

**Senior Ecologist: (Original submission) OBJECT** - The PEA recommends further surveys for great crested newts and water vole which have not yet been reported. Currently there is insufficient information to assess the impact of this proposal on protected species.

(Amended scheme): Comments on botanical survey just submitted are awaited from our Senior Ecologist and water vole second survey scheduled for 14/07/26 so outstanding at the time of writing.

## **REPRESENTATIONS**

**ONE** item of correspondence received raising **OBJECTION** on the following summarised grounds:

- Noise
- Residential amenity
- Highways - Increase in traffic on a road that is already dangerous (60 mph on what is only just wide enough for 2 vehicles) and on a bend. Work vehicles and heavy plant during build process make an incident inevitable.

**Cllr Paul Kunes:** Request to call in the application for determination by the Planning Committee.

## **KING'S LYNN AND WEST NORFOLK LOCAL PLAN 2021-2040**

**LP02** - Residential Development on Windfall Sites (Strategic Policy)

**LP01** - Spatial Strategy and Settlement Hierarchy Policy (Strategic Policy)

**LP04** - Presumption in Favour of Sustainable Development Policy (Strategic Policy)

**LP06** - Climate Change (Strategic Policy)

**LP13** - Transportation (Strategic Policy)

**LP14** - Parking Provision in New Development

**LP18** - Design & Sustainable Development (Strategic Policy)

**LP19** - Environmental Assets - Green Infrastructure, Landscape Character, Biodiversity and Geodiversity (Strategic Policy)

**LP20** - Environmental Assets- Historic Environment (Strategic Policy)

**LP21** - Environment, Design and Amenity (Strategic Policy)

**LP25** - Sites in Areas of Flood Risk (Strategic Policy)

**LP27** - Habitats Regulations Assessment (HRA) (Strategic Policy)

**LP31** - Custom and Self-Build Housing (Strategic Policy)

## **NATIONAL GUIDANCE**

National Planning Policy Framework (NPPF)  
Planning Practice Guidance (PPG)  
National Design Guide 2021

## **PLANNING CONSIDERATIONS**

The main considerations in determining this application are as follows:

- Principle of development
- Impact on character and appearance of countryside
- Impact on neighbour amenity
- Highway issues
- Flood risk and drainage
- Ecology/Biodiversity
- Any other matters requiring consideration prior to determination of the application

## **Principle of Development:**

This is an Outline application for up to 4no. self-build/custom build plots for dwellings. All matters, with the exception of access, are reserved for later consideration, and the indicative plan shows four similar sized plots fronting Hay Green Road with a single shared access point midway along the site frontage on the apex of the bend.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 and paragraph 48 of the NPPF requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise.

Hay Green is classified as a Tier 6 (Small Villages or Hamlets) settlement under Policy LP01 of the Local Plan 2021-2040.

Under Policy LP02 of the Local Plan, in Tier 6 settlements as defined by Policy LP01, residential development will not normally be supported outside development boundaries, unless allocated through the Local Plan or a Neighbourhood Plan. There is no allocation for additional dwellings in Policy LP01 and there is no Neighbourhood Plan, therefore, the principle of development fails.

Hay Green is mentioned in Appendix I as being a settlement within the parish of Terrington St Clement, it is however clearly identified as a Tier 6 settlement in Policy LP01.

In terms of the information submitted in support of the proposal, there appears to be a misconception that the development area relates to Terrington St Clement and is therefore windfall development adjoining a Tier 4 Key Rural Service Centre (KRSC). That quite clearly is not the case.

Whilst not 'isolated' given the neighbouring properties, it is nevertheless remote from day-to-day service provision (employment, schools, doctors, shops etc.) and any prospective residents would be reliant upon private forms of transport. The nearest KRSC is indeed Terrington St Clement which is some 2.7km away via road and on the opposite side of the A17. Paragraph 83 of the NPPF states that housing should be located where it will enhance or maintain the vitality of the rural communities. Once again, this is not a sustainable location for new residential development.

From June 2026 the Council can demonstrate 6.2 years' worth of housing supply. At the present time, the Council has a shortage of self-build and custom sites.

The NPPF explains in footnote 28, that the Self-Build and Custom Housebuilding Act 2015 (as amended recently by the LURA), places a legal duty "to give enough suitable development permissions to meet the identified demand". However, this does not mean development is automatically granted but would be afforded weight when determining the application. In this instance 'some' weight is given to this matter.

Furthermore, Policy LP31 of the Local Plan supports proposals where they respect local character and comply with other relevant policies in the plan. Self-build and custom dwellings would have to be secured via legal agreement.

Therefore, whilst the potential of up to four self-build and custom dwellings in this location would be afforded some weight, this does not outweigh the policies within the Local Plan and fundamental conflict identified above. There are other planning issues which will be expanded upon below.

### **Impact on Character and Appearance of Countryside:**

Policies LP18 and LP21 ensure that development in the borough is of high quality, conserving and enhancing the amenity of the wider environment, by supporting development which is sympathetic to the local setting and pattern of adjacent streets, including spaces between buildings, through high-quality design and use of materials.

Furthermore, LP31 of the Local Plan 2021-2040 supports custom and self-build dwellings where they respect local character and comply with other relevant policies in the plan.

This is reiterated in paragraph 135 of the NPPF which states that planning decisions should ensure development will function well and add to the overall quality of the area for its lifetime, are visually attractive, sympathetic to local character and history, maintain a strong sense of place, optimise the potential of the site, and create safe, inclusive and accessible places.

Finally, paragraph 187 of the NPPF seeks to ensure planning policies and decision should contribute and enhance the natural and local environment by protecting and enhancing valued landscapes and recognise the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services.

As an Outline application, full details regarding design have not been submitted. Based on the indicative site plan, four detached dwellings with associated detached garages are proposed fronting the road, within consistent sized plots.

This area is located within The Fens - Open Inland Marshes within the Landscape Character 2007, characterised by large scale, low-lying landscape, offering a sense of openness and a moderate to strong sense of tranquillity.

The northern side of Hay Green Road is characterised by loose knit ribbon development comprising a mix of house types with substantial domestic, agricultural and commercial buildings situated to the rear. The road has a predominantly verdant character, with mature trees and hedgerows.

The southern side is mostly fields with a couple of detached houses with a substantial commercial yard and buildings to the rear. It is therefore more open in character with views southwards to additional agricultural land.

The proposal would erode the rural countryside setting, further urbanising the character of Hay Green Road by consolidating the domestic and residential appearance in this location, contrary to the rural character, and obstructing open views to the fen landscape beyond contrary to Policies LP18, LP19 and LP21 of the Local Plan and the NPPF.

### **Impact on Neighbour Amenity:**

The closest neighbours to the site would be the bungalow No. 53 Church Road approximately 20m to the immediate north of the site.

Based on the indicative plans, it is considered there could be sufficient distance to limit impacts to neighbours in respect to overlooking, shadowing and being overbearing due to the plot sizes to comply with Policy LP21 of the Local Plan 2021-2040.

This would, however, be subject to the details of a further reserved matters application.

## **Highway Issues:**

As stated earlier in this report, access is to be determined at this stage. The indicative layout plan shows a single shared access point off Hay Green Road.

The NPPF supports sustainable transport and paragraph 117 in particular points to the need to 'give priority first to pedestrian and cycle movements' and 'so far as possible - to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use

Local Plan Policy LP13 reflects this stance. Policy LP14 requires adequate car parking spaces per dwelling and to provide a minimum of one secure and covered cycle space per dwelling.

The Local Highway Authority (LHA) have considered the plans submitted and are of the opinion that the proposed accesses would be safe, and the parking and turning arrangements for vehicles could accord with the adopted parking guidelines for Norfolk. Conditions have therefore been recommended, should permission be granted, to ensure the correct construction specifications are taken into account, visibility achieved and maintained and to ensure any gates are set back and correctly installed.

Although the LHA have raised no objection to the proposal, they indicate that the proposal would conflict with the aims of transport sustainable development, which is a requirement within the NPPF (as stated above), as the site is remote from facilities and services required for day-to-day living and has restricted employment opportunities in the area. However, although Chapter 9 of the NPPF requires development to be focused on locations which are sustainable through limiting the need to travel and offering a genuine choice of transport modes, paragraph 116 goes on to say that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety.

In conclusion, the proposed development would achieve an acceptable standard of highway safety in accordance with Policy LP13 of the Local Plan and the principles of the NPPF. However, it does not comply with the promotion of sustainable transport as required by Local Plan Policy LP02 part 1.f. and Policy LP13 part 4 which requires development to maximize opportunities to reduce the need to travel and to encourage sustainable and active travel modes of transport and also fails to comply with the requirements contained within the NPPF.

## **Flood Risk and Drainage:**

The site lies within Flood Zone 3a and Tidal Hazard mapping zone. The application is accompanied by a site-specific Flood Risk Assessment which indicates mitigation measures raising Finished Floor Levels by 0.8m above existing ground levels plus 300mm of flood resilient construction above FFL. The development could therefore be made safe.

The development is located within Flood Zone 2 and 3, sequential and exceptions testing in line with the NPPF is required. It is for the Local Planning Authority to steer development to areas at least risk of flooding in accordance with the sequential test (Paragraph 174 of the NPPF) and Policy LP25 of the Local Plan.

There are no other sites currently available for residential development of an equivalent scale within Hay Green in a lower risk of flooding, hence the sequential test is passed.

The exception test also has to be applied and both parts contained in Paragraph 178 must be passed as stated in Paragraph 178 of the NPPF. The mitigation measures recommended in the site-specific FRA would ensure that the development could be made safe for its lifetime without increasing flood risk elsewhere. However, the unsustainable location of the development combined with the impact on form and character resulting from flood mitigation and the intrusion of development into the countryside are factors which would outweigh the flood risk implications. Both parts of the exception test therefore cannot be met.

The proposal fails to comply with paragraph 179 of the NPPF (2024) and Policy LP25 of the Local Plan.

Surface water drainage details may be secured via condition if the proposal was being supported and byelaw implications raised by the IDB are covered under separate legislation (Land Drainage Act). The agent advises that byelaw approval is being sought.

### **Ecology and Biodiversity Net Gain:**

As self-build and custom dwellings, the proposal would be exempt from providing Biodiversity Net Gain (BNG) under Schedule 7A of the Town and Country Planning Act 1990, subject to the tenure of the dwellings being secured by legal agreement.

Notwithstanding exemption from providing 10 per cent biodiversity net gain, new development has a duty to deliver gain under the NPPF.

The application is accompanied by a Preliminary Ecological Assessment (PEA) as the site is bounded on three sides by land drains.

The PEA recommends further surveys for great crested newts and water vole which at the time of writing this report have not yet been submitted. A positive determination could not be made until this information is received.

Details of a phase 2 botanical survey have just been submitted which will require review by our Senior Ecologist and Members will be updated in late correspondence. A second water vole survey is also outstanding (scheduled for 14/07/28), so could be submitted before the meeting.

However, currently there is insufficient information to assess the impact of this proposal on protected species, and it fails to comply with Policy LP19 of the Local Plan.

Whilst the site falls within the Brecks, Wash, and Norfolk Coast Zone of Influences, it is not within close proximity to these zones and therefore a bespoke appropriate assessment is not required. The development proposes up to four dwellinghouses. As such a GIRAMS mitigation fee of £315.58 per dwelling (from 1 April 2026) would be required to be paid to offset recreational impacts to Zones of Influence (Zols). No payment has been made at this stage to offset the recreational impacts to these zones, which the agent suggests being included in a Section 106 agreement. There is however no such mechanism in place to do so, so the proposal technically fails to accord with Policies LP19 & LP23 of the Local Plan.

### **Other matters requiring consideration prior to the determination of this application:**

#### *Other development approved in Hay Green:*

The agent raises this issue in support of the application. Two plots have recently been granted on the opposite side of the road to this site – application ref: 25/02105/O. These are

however infill plots contained within the defined development boundary and are considered to comply with Policy LP02 as windfall development.

Had there been a housing need for Hay Green, this approval would have met it.

#### *Climate Change:*

All development shall recognise and contribute to the importance of, and future proofing against, the challenges of climate change and to support the transition towards meeting the Government target of becoming a net zero economy by 2050 as outlined in Policy LP06 of the Local Plan.

Details to be provided at Reserved Matters stage would show whether measures are incorporated into the final design to meet the sustainability aims and objectives of Local Plan Policies LP06 and LP18. This could include types of materials, construction methods, energy efficiency measures utilised within the development, and other sustainable measures.

However, it is worth noting that the proposed development adjoins a Tier 6 settlement identified as having no services. The application would therefore fail to comply with part 1 of Policy LP06 of the Local Plan which requires new development to be located in areas which minimise the need to travel and to maximise the ability to make journeys via sustainable modes of transport.

#### *Impact on trees:*

The application is supported by an arboricultural report which concludes that no trees are to be removed to facilitate the development. The trees identified for retention (Goat Willow, Hawthorn, Lime and Oak) are generally of limited arboricultural and landscape significance and, subject to appropriate protection measures during construction, there would be no objection from our Arboricultural Officer. The proposal could accord with Policy LP19 of the Local Plan on this matter.

#### *Historic Environment:*

Concentrations of pottery of medieval date have been recorded from within and adjacent to the application site. There is potential for previously unidentified heritage assets with archaeological interest (buried archaeological remains) to be present within the current application site and that their significance would be affected by the proposed development.

Historic Environment Services have therefore requested a suite of conditions. Had the application been recommended for approval, this would have complied with LP20 of the Local Plan 2021-2040.

### **PLANNING BALANCE/CONCLUSION**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that an application must be determined in accordance with the development plan unless material considerations indicate otherwise.

The proposal is located outside of the development boundary of the hamlet of Hay Green and contrary to the Council's strategic strategy with regard to the provision of windfall residential development in Tier 6 settlements being accommodated within the development boundary.

'Some' weight is afforded to the self-build and custom nature of the development when considering the planning balance as the Council does not have an adequate supply of self-build and custom housing. Likewise there would be some economic benefits associated with the proposal - these include employment and supply chain spend during the construction phase that could be localised, and through support for the local economy and community facilities once occupied. However, the proposal is small in scale, and these benefits are therefore 'limited'. The proposal would also provide additional housing, but this benefit is limited given that the Council is able to demonstrate a healthy supply of deliverable housing sites (6.2 year's worth at June 2026).

Notwithstanding this, the adverse impact of the proposal, eroding the rural countryside setting, further urbanising the character of Hay Green Road by consolidating the domestic and residential appearance in this location, contrary to the rural character and obstructing open views to the fen landscape beyond, is considered to outweigh the positive contribution that the granting of up to four self-build and custom dwellings would have. Significantly, the proposal also fails the Exception Test with regards to Flood Risk. The granting of the proposal is considered to cause significant and demonstrable harm and should therefore be refused in accordance with the development plan.

It is therefore recommended the application is refused under Local Plan Policies LP01, LP02, LP06, LP13, LP18, LP19, LP21, LP25, LP27 and LP31 and provisions of the NPPF.

## **RECOMMENDATION:**

**REFUSE** for the following reason(s):

- 1 Local Plan Policy LP01 (Spatial Strategy and Settlement Hierarchy) seeks to distribute the majority of growth within the most sustainable locations. This approach makes the most of existing services and facilities, providing jobs and housing in the most accessible locations. Small Villages and Hamlets within Tier 6 of Local Plan Policy LP01 provide very little in the way of service provision, and residential growth in these areas will not normally be supported outside of development boundaries unless allocated through the Local Plan or a Neighbourhood Plan and as set out within Local Plan Policy LP02.

The proposal would therefore result in an unjustified residential development in the countryside, which would erode the rural countryside setting, further urbanising the character of Hay Green Road by consolidating the domestic and residential appearance in this location, contrary to the rural character, and obstructing open views to the fen landscape beyond.

The application site is also not considered to be within a sustainable location for residential development due to its lack of footpaths, lighting or connection to local facilities and services.

Notwithstanding the Council's current lack of deliverable Self-Build & Custom housing sites, the adverse impacts upon the character of the surrounding area would significantly and demonstrably outweigh the benefits of up to four additional homes in the borough. The proposal is therefore contrary to the provisions of the NPPF, in particular Paragraph 83 and Policies LP01, LP02, LP06, LP13, LP18, LP19, LP21 and LP31 of the Local Plan (2021-2040).

- 2 The site lies within Flood Zone 3a and a Tidal Hazard mapping zone. It is for the LPA to steer development to areas at least risk of flooding in accordance with the sequential test (Paragraph 174 of the NPPF) and Local Plan Policy LP25.

There are no other sites available for residential development of an equivalent scale within Hay Green in a lower risk of flooding and therefore this proposal passes the sequential test.

The exception test also has to be applied as prescribed by Paragraph 178 of the NPPF and both parts must be passed. The mitigation measures suggested in the site-specific Flood Risk Assessment, indicate that the development could be made safe for its lifetime without increasing flood risk elsewhere. However, this is not considered to be sustainable development given the unsustainable location of the development combined with the impact on form and character resulting from flood mitigation and the intrusion of development into the countryside which are factors which would outweigh the flood risk implications. Both parts of the exception test cannot be met.

The proposal therefore fails to comply with paragraph 179 of the NPPF 2024 and Policies LP06 & LP25 of the Local Plan (2021-2040).

- 3 The application is accompanied by a Preliminary Ecological Assessment (PEA) as the site is bounded on three sides by land drains.

The PEA recommends further surveys for great crested newts and water vole which have not been submitted. So, currently there is insufficient information to assess the impact of this proposal on protected species and it fails to comply with Policy LP19 of the Local Plan (2021-2040).

- 4 Whilst the site falls within the Brecks, Wash, and Norfolk Coast Zone of Influences, it is not within close proximity to these zones and therefore a bespoke appropriate assessment is not required. The development proposes up to four dwellinghouses. As such a GIRAMS mitigation fee of £315.58 per dwelling (from 1 April 2026) would be required to be paid to offset recreational impacts to Zones of Influence (ZoIs). No payment has been made at this stage to offset the recreational impacts to these zones, which the agent suggests to be included in a Section 106 agreement. There is however no such mechanism in place to do so, so the proposal technically fails to accord with Policies LP19 & LP23 of the Local Plan.