

Planning Committee

13 September 2024

Agenda item number 7.1

BA/2023/0214/FUL and BA/2023/0215/LBC Toft Monks Mill, Haddiscoe Island

Report by Heritage Planning Officer

Proposal

Restoration of drainage mill, rebuilding of engine shed and erection of replacement dwelling

Applicant

Mr and Mrs Singer

Recommendation

Approve subject to conditions, RAMS payment, and Section 106 Agreement

Reason for referral to committee

Objection from the Environment Agency

Application target date

Original target date 29/08/2023 Extension of time agreed 16/10/2024

Contents

1.	Description of site and proposals	2
2.	Site history	3
3.	Consultations received	4
4.	Representations	5
5.	Policies	5
6.	Assessment	6
	Principle of development	6
	Impact on heritage, design and landscape	7
	Flood Risk	8
	Surface Water Drainage	13
	Water Efficiency	13

Highways	14
Ecology	14
Trees	14
Amenity	15
7. Conclusion	15
8. Recommendation	15
9. Reason for recommendation	16
Appendix 1 – Location maps	17
Appendix 2 – Full consultation responses	19
Parish Council	19
District Member	19
Broads Society	19
Highways	19
Natural England	19
Environment Agency	23
Local Lead Flood Authority	30
Internal Drainage Board (Water Management Alliance)	30
Broads Authority Ecologist	33
Broads Authority Tree Officer	34
Broads Authority Landscape Officer	35
Historic England	37
Joint Committee of Amenity Societies (SPAB in this instance)	37
Historic Environment Services	38
Broads Authority Historic Environment Manager	39

1. Description of site and proposals

- 1.1. The application site contains a Grade II listed drainage mill, Toft Monks Mill, which sits within Halvergate Marshes Conservation Area. Toft Monks Mill is on an area of land known as Haddiscoe Island. The land is separated by the River Yare to the northwest, River Waveney on the southeast and the Haddiscoe New Cut on the southwest boundary, forming an almost complete inland island. The site is accessed via a road (the Norfolk Way) which extends down from the A143, just to the south of the boatyards at St Olaves. A long distance footpath runs around the whole edge of the

island. Only a handful of properties exist out on the Island, along with a number of listed drainage mills. The nearest neighbour is Seven Mile House which sits approximately 600m to the north east of the mill. The mill itself has undergone a number of restoration phases, most recently the 1970s/80s and has a modern cap. It has deteriorated in recent times and is in need of repair/restoration.

1.2. List description- HADDISCOE CHEDGRAVE MARSHES TG 448 009 3/10 Toft Monks (Detached) 5.9.60 Windpump (formerly included under Toft Monks C.P. Ref. 13/1) – II. Disused drainage windpump. Red brick battered tower. Circular on plan, 4 storeys. Renewed pivot windows with cross glazing bars in segmental headed openings. Segmental headed half-glazed door on east side. Iron band around tower at first floor level. C20 replica cap not of special interest.

1.3. The proposal is for the:

- Full restoration of the mill, including the re-installation of the internal gearing and timbers, installation of a new cap and sails.
- Re-building of a previously lost engine shed to house the old pump restored machinery as a small museum/ point for visitors.
- Erection of a replacement 2 bedroomed, single storey dwelling.

2. Site history

2.1. **Important note:** For clarity, there is a complex history to the site. After an initial round of consultation in July 2023 it was not clear if the applications were for a new or replacement dwelling and this potentially had implications on the acceptability of the proposal and therefore the application could not be progressed at that time.

2.2. A certificate of lawful use or development CLEUD (BA/2023/0426/CLEUD) was submitted and has subsequently been issued as it was proven that a 1974 permission for a residential extension to the drainage mill had been started, was extant, and could therefore be completed. Given the CLEUD these applications are now for a replacement dwelling and not a new dwelling.

2.3. It should be noted that the 1974 permission allowed for a 4 bedroomed dwelling attached to the mill (and included accommodation inside the mill), which would have restricted the cap and sail movement.

2.4. The current applications are for a replacement permission for a two bedroomed single storey dwelling sitting separately to the mill. The mill is proposed to be restored.

Application Number	Proposal Details	Application Status
APP/2210/A/72/2926 (1974)	Conversion and Extension to mill to form dwelling	ALLOWED ON APPEAL

BA/2010/0304/FUL	Works to include strengthening, rollback, setback and crest piling of flood banks. Maintenance, soke dyke excavation and riverside piling work with formation of temporary site compound and associated engineering works.	APCON
BA/2023/0214/FUL	Part retrospective- Restoration of drainage mill, re-build steam pump building, and erection of replacement building for living accommodation (removing this element from the drainage mill).	PCO
BA/2023/0215/LBC	Part retrospective- Restoration of drainage mill, re-build steam pump building, and erection of replacement building for living accommodation (removing this element from the drainage mill).	PDE
BA/2023/0426/CLEUD	Lawful Development Certificate for confirmation that 1974 permission implemented and that the property has been used as residential accommodation for a period in excess of 4 years and as such has residential status	CLUED

3. Consultations received

*For full consultation responses please see [Appendix 2](#).

3.1. BA/2023/0214/FUL

Parish Council – No response

District Member – No response

Broads Society – Full support

Highway Authority – No objection

Natural England – No objection subject to mitigation

Environment Agency – Objection due to impact on flood risk

Local Lead Flood Authority – Standard advice

Internal Drainage Board (Water Management Alliance) – No objection but other licenses maybe required

Broads Authority Ecologist – No objection subject to mitigation and enhancement

Broads Authority Tree Officer – No objection subject to mitigation

Broads Authority Landscape Officer – No objection

3.2. BA/2023/0215/LBC

Historic England – No comments

Joint Committee of Amenity Societies (SPAB) – Support

Historic Environment Services – No objection subject to historic building recording

Broads Authority Historic Environment Manager – Support

4. Representations

4.1. None

5. Policies

5.1. The adopted development plan policies for the area are set out in the [Local Plan for the Broads](#) (adopted 2019).

5.2. The following policies were used in the determination of the application:

- DM2- Water Quality and Foul Drainage
- DM4- Water Efficiency
- SP2- Strategic Flood Risk Policy
- DM5- Development and Flood Risk
- DM6- Surface water run-off
- SP3- Climate Change
- DM9- Climate Change Checklist
- SP5- Historic Environment
- DM11- Heritage Assets
- DM12- Re-use of Historic Buildings
- SP6- Biodiversity
- DM13- Natural Environment
- SP7- Landscape Character
- DM16- Development and Landscape
- DM21- Amenity
- DM23- Transport, Highways and Access
- SP15- Residential Development
- DM40- Replacement Dwellings

- DM43- Design
- DM47- Planning Obligations and Developer Contributions
- SSMILLS- Drainage Mills

5.3. Material considerations

- National Planning Policy Framework
- Planning Practice Guidance

6. Assessment

6.1. The main issues to consider on determination of the applications are, the principle of the development, heritage, design, landscape, flood risk and water management, highways, ecology and amenity.

Principle of development

- 6.2. The NPPF places great weight on the conservation of the historic environment and designated landscapes. The application site is situated within the Broads (an area with the equivalent of National Park status) and Halvergate Marshes Conservation Area. One of the most defining landscape features of the Broads, and this conservation area in particular, are the Broad's drainage mills. Although once a prominent landscape feature many of the mills have deteriorated and many have sadly been lost. Given they are no longer functioning, the cost of upkeeping such a building is not often viable and as a result many are only maintained by charitable grants or enthusiastic landowners. Many often sit within remote locations, in zones of high flood risk, are inaccessible, and have limited outbuildings making finding suitable sustainable uses for them challenging. It is therefore considered imperative to ensure the retention and appropriate use of certain suitable mills to help fund their maintenance and secure their protection in the Broads landscape wherever possible and the Local Plan (2019) has a site specific policy to support this (SSMILLS: Drainage Mills).
- 6.3. Given the very rare and special set of circumstances at Toft Monks Mill, including an existing level of residential use proven through a Certificate of Lawful Use application (outlined in Section 2 above), adequate access, and the opportunity to improve the flood risk situation, this site is considered more appropriate for residential than most other more remote mills (see detail below). It is considered that this proposal includes significant heritage and landscape benefits by securing the restoration of the listed mill and a sustainable use adjacent. It includes the restoration of the internal mechanics of the mill, the cap, sails and scoop wheel meaning significant landscape and heritage improvements and public benefits would be secured. The addition of the visitor interpretation through the re-built steam shed will improve the visitor offer of the Broads., By allowing a suitable viable use in a building adjacent to the mill (the dwelling), the application would secure the retention of the mill in the Broads landscape for existing and future generations to enjoy. The principle of the proposal is therefore considered to be supported by both national and local planning policy.

- 6.4. The proven extant 1974 permission, which could be completed at any time in the future, includes the direct extension of the mill and its conversion into a 4 bedroomed dwelling. The extension was an unsympathetic design, was to be located attached to the mill, was two storeys high, and would stop the cap and sails from turning. It is considered the extant permission would be of significant detrimental impact to the listed status of the mill and wider character of the conservation area.
- 6.5. This new proposal is to remove the residential accommodation from inside and as an extension attached to the mill (the extant permission) to allow for the full restoration of the mill both internally and externally and to move the residential accommodation into a purpose-built building on site. A new interpretation building, to be built on the site of the historic engine house, is to be provided to be used for interpretive historic information for people accessing the site from an existing long-distance footpath and by the river itself.

Impact on heritage, design and landscape

- 6.6. Toft Monks Mill is a grade II listed drainage pump, situated on Haddiscoe Island and within the Halvergate Marshes Conservation Area. It is likely to date from the mid-19th century. The remains of a later 'Humpback' vertical steam pump are also retained on the site, along with the foundations of its engine house and the pump is identified in the Halvergate Marshes Conservation Area Appraisal as a rare survivor. The mill is in a relatively sound condition, although some elements are currently missing, including the stocks, sails, fantail and some internal machinery and the cap is an inaccurate replica of the original, all of which erode its heritage value and character. The proposal is thorough in its approach and the repairs will ensure that the mill does not continue to deteriorate. The proposal to rebuild the engine house is considered appropriate and as well as providing protection for the 'Humpback' steam pump, will also enable some heritage interpretation of the mill which will be beneficial. It is considered that the proposal meets the requirements of Local Plan Policy SSMILLS and Policy DM11. As well as Toft Monks Mill being significant in its own right as a good example of a mid-19th century drainage pump, the mill is an important landscape feature and as such has group value with the other mills and positively contributes to the significance of the conservation area. It is considered that the proposal to repair and restore the external appearance of the mill will ensure that it further enhances the character and appearance of the Halvergate Marshes Conservation Area and contributes to local distinctiveness in line with Local Plan Policy DM11 and NPPF para 197.
- 6.7. An integral part of the overall proposal is for a small building adjacent containing living accommodation. The building is physically and visually lightweight (not an uncommon building type within the Broads), and the scale of the building and the proposed materials will ensure that it is visually recessive and does not impose on the setting of the listed mill, or the wider landscape. In term of this wider impact, it is considered that it will be minimal as 'Haddiscoe Island occupies negative space – from the wider landscape the landform is concealed by the river walls, so that the eye

travels over it to the furthest edges of the marsh' (Halvergate Marshes Conservation Area Appraisal, page 18). The modern design is considered to be innovative, of a high quality, and will add architectural interest to the locality in accordance with policy DM43 of the Local Plan (2019).

- 6.8. A Section 106 Agreement is proposed to ensure the restoration of the mill is secured prior to the use of the dwelling, the extant permission is replaced by this up to date permission (and could therefore no longer be built in the future) and that the mill and dwelling are never sold separately.
- 6.9. Given the above it is considered the proposal is a significant improvement to the extant permission in terms of impact on design, heritage and landscape and therefore welcomed.

Flood Risk

- 6.10. The site is situated within Flood Risk Zone 3a – see below which means the proposals will need to pass both the sequential and exceptions test as outlined in the NPPF in order to be considered appropriate in flood risk terms. In order to apply the tests, the Local Planning Authority needs to first establish what flood risk vulnerability classification the development falls within. There are multiple elements to this proposal and therefore the elements have been separated for ease of classification as follows:
 - a) Replacement dwelling: More vulnerable
 - b) Interpretation building (re-built pump house): Less vulnerable
 - c) Restored Drainage Mill (not used for drainage purposes): There is no clear classification for this as the building is no longer used but previous use, as a drainage mill, or use for historic interpretation for visitors, would be water compatible
- 6.11. It is acknowledged that the site sits within indicative Flood Risk Zone 3b which would usually be inappropriate for residential dwellings however in this case the [Broads Authority Supplementary Planning Document on Flooding](#) states at point 6.7.3: where an existing building or structure acts as a barrier to flood water then its functionality is compromised and it will not be classified as Flood Zone 3b and can be described as Flood Zone 3a.
- 6.12. Whilst it is appreciated that the mill has not been extended to provide the house allowed under the extant 1974 permission and therefore currently does not block the flood plain, this could be undertaken at any time in the future without any further consent. The existing permission allows for an extension to the mill that would block the functional flood plain. The likelihood of the 1974 extension being built to provide residential accommodation now the extant permission has been proven is high given the increased value a dwelling at this site would achieve, especially if the site is sold on. In this exceptional case it is therefore considered that the site should be considered as being within Flood Zone 3a in line with the SPD at point 6.11. above.

- 6.13. A replacement dwelling is considered suitable in Flood Zone 3a subject to benefits being secured as outlined within The Broads Authority Supplementary Planning Document on Flooding.
- 6.14. The proposal is to remove the residential accommodation from inside the mill and as an extension attached to the mill (extant permission) to allow for the full restoration of the mill and to move the residential accommodation into a purpose-built building on site. The proposed replacement dwelling is of a design to be positioned above flood water (built on stilts), except in exceptionally high floods.
- 6.15. The sequential test asks the Authority to establish if alternative reasonably available sites within a lower risk zone been identified. As the mill already exists and the proposal involves its restoration in association with the building of the replacement dwelling the applicant is limited to providing the development within the application site. While a replacement dwelling could feasibly be provided elsewhere at a site of lower flood risk, there would not be the heritage and landscape benefits that would be seen through providing a long term and sustainable use adjacent to the listed mill and re-built pump house. There would also not be the opportunity to ensure the unsympathetic 1974 permission is not built in the future (more information can be seen within the Exceptions Test below).
- 6.16. In addition, the extant permission does not incorporate any flood resilient measures, and the residential accommodation with 4 bedrooms could be built at ground level blocking the flood plain. The new proposed replacement dwelling contains 2 bedrooms (meaning a reduced capacity) and is to be built on stilts to allow flood water to flow underneath, not an uncommon practice within the Broads. An outline flood response plan and evacuation plan has been submitted to ensure occupants are not on site in times of extreme flooding and a refuge is to be provided within the mill, along with details on access and egress to a safe location within the event of a flood. It is therefore considered that the proposal represents an improvement to what could be built on site (the extant permission) in terms of impact on flood risk, as highlighted in the table below.

Impact on Flood Risk

1974 permission	New scheme	Benefits (compared with 1974 permission)
4 bedroomed dwelling	2 bedroomed dwelling	Reduced occupancy level, reduces risk to people on site in the event of a flood
Built to restrict the flood plain (at ground level)	Built on stilts above flood levels	Allows for a functional flood plain (except in extreme cases) and no loss of flood storage capacity

No flood response and evacuation plan	Flood response and evacuation plan	Allows for a robust flood response and evacuation procedure for occupants including information on access and egress to a safe location in the event of a flood
First floor refuge in mill	First floor refuge in mill	Allows for safe refuge should evacuation procedure fail

6.17. Turning to the Exceptions Test, the Authority is required to question if the development provides wider sustainability benefits to the community which outweigh flood risk? As highlighted at 6.2-6.9 although once a very prominent landscape feature many of the Broads drainage mills have deteriorated and many have been lost. Given they are no longer functioning, the cost of upkeeping such a building is often not viable, it is therefore considered imperative to ensure the retention and appropriate use of certain suitable mills to help fund their maintenance and secure their protection in the Broads landscape wherever possible.

6.18. Given the rare and special set of circumstances at Toft Monks Mill; including a level of residential use which could be legally provided on site, adequate accessibility, the opportunity to improve the flood risk situation, this site is considered more appropriate for residential use than some of the other more remote mills. By allowing a sustainable use adjacent to the mill this would secure the funding of the maintenance of the mill, and retention of the mill in the Broads landscape for existing and future generations to understand and enjoy.

6.19. A Section 106 agreement can be used to:

- secure the use of the mill and dwelling to ensure the site is not divided off separately in the future, and,
- ensure the mill is restored prior to the dwelling being completed/used, and,
- ensure the 1974 permission cannot be implemented in the future (effectively a replacement permission).

A table of the heritage benefits is provided below:

1974 permission	New scheme	Benefits (compared with 1974 permission)
Unsympathetic design attached directly to the mill	Sympathetic design not attached to the mill	Allows restored mill to be read as it would have been historically
Position restricts sail and cap movement	Allows for full sail and cap movement	Moving cap and sails would allow for mill to be read as it would have historically and would reduce deterioration of cap and sail elements. Greater contribution to the wider landscape.

As mill used for residential accommodation no internal restoration was proposed	Internal restoration proposed	Scheme allows for the restoration of the internal mechanisms allowing the mill to operate as it would have done historically
No visitor interpretation or access proposed	Historical interpretation to be provided within re-built engine shed	Visitor benefits through heritage interpretation
No legal control previously secured	Separate residential use secures a means to secure ongoing maintenance and repair of the listed mill	Linking the accommodation with the mill via a Section 106 agreement secures the future viability and maintenance of the drainage mill (the restoration of the mill prior to the erection/use of the dwelling and ensuring the 1974 permission is never implemented can also be secured via Section 106).

6.20. The scheme provides the following sustainability benefits as outlined in the Local Plan Sustainability Appraisal Objectives (table below):

Sustainability Objective	How proposal meets objective
ENV3: To protect and enhance biodiversity and geodiversity.	Green roof, planting, biodiversity enhancements, and a functional flood plain
ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.	Restoration of an important historic drainage mill that will be visible across a wide area and interesting and innovative design of new building
ENV5: To adapt, become resilient and mitigate against the impacts of climate change	Improved design of building
ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.	Improved design of building, reduced capacity of building, flood response and mitigation plan.
ENV7: To manage resources sustainably through the effective use of land, energy and materials.	Use of traditional materials and source of materials for new building.
ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings.	Restoration of important historic drainage mill. Protection of setting through innovative and interesting design of new building, securing a future use associated with the mill.
ENV10: To achieve the highest quality of design that is innovative, imaginable, and	Innovative and interesting design of new building.

Sustainability Objective	How proposal meets objective
sustainable and reflects local distinctiveness.	
SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.	Securing the future of an important historic drainage mill, providing historic interpretation for the public.
SOC3: To improve education and skills including those related to local traditional industries.	Use of traditional materials for building and heritage skills for restoration of mill.
SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.	Securing the future of an important historic drainage mill, providing historic interpretation for - the public.
ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.	Securing the future of an important historic drainage mill, providing historic interpretation for the public.
ECO2: To ensure the economy actively contributes to social and environmental well-being.	Securing the future of an important historic drainage mill, providing historic interpretation for the public.
ECO3: To offer opportunities for tourism and recreation in a way that helps the economy, society and the environment.	Securing the future of an important historic drainage mill, providing historic interpretation for the public.

6.21. Given the above, it is considered that there are wider sustainability benefits that outweigh flood risk concerns in these exceptional circumstances.

6.22. As part of the exceptions test the Authority also needs to question whether the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will it reduce flood risk overall. As this mill has an existing extant permission for a dwelling (meaning there is already a degree of flood risk to its occupants should the extant permission be built as is) and as the proposal helps to improve the situation through design by providing a suitable design and opportunity to put a flood response plan and evacuation strategy in place it is considered that flood risk improvements are achieved as a result of the proposal.

6.23. To summarise flood risk issues:

- The site has an extant permission for an extension and conversion of a listed drainage mill to a 4 bed dwelling. This has been started and could be finished at any time in the future.

- This proposal, to replace the previous extant permission, is to restore the mill to a winding condition and build a 2 bed dwelling on stilts above the flood plain.
- Flood risk benefits can be secured in the form of a reduction in the amount of occupancy, design to be built above the flood plain, and flood response and evacuation plan.
- Heritage benefits can be secured- by allowing the erection of the 2 bedroomed unit is to secure a sustainable use of the mill and its future maintenance. The removal of the extension to the mill and full restoration.
- Additional Local Plan Sustainability Appraisal benefits are secured (listed above).
- The restoration of the mill prior to the use of the dwelling can be secured by a Section 106 (as well as ensuring the two buildings remain linked to each other and not sold off separately and ensuring the 1974 permission can no longer be built).

6.24. The existing proposal is therefore considered a betterment in terms of impact on flood risk and heritage and therefore acceptable in accordance with the NPPF, policies SP2, DM5 of the Local Plan (2019) and the Flood Risk Supplementary Planning Document (2020). It should be noted that the Environment Agency objects to the proposal with concerns regarding; the classification of the site as 3a and not 3b, the refuge no longer being attached to the domestic accommodation (therefore occupants having to potentially make their way to the mill in an extreme flood event – should they have not evacuated in the meantime), the mill (as the refuge) being able to take the hydrostatic and hydrodynamic pressures of a flood, the new building not being high enough to be above extreme flood water levels which will become more common due to climate change, and a potential increase in the footprint of the dwelling. The agent is hoping to respond to these concerns and members will be updated on this. Please see full responses in [Appendix 2](#) for more information.

Surface Water Drainage

6.25. The Lead Local Flood Authority has highlighted that the Planning Authority is responsible for ensuring the suitability of the surface water drainage of a scheme of this scale. It is therefore considered the detail of this should be conditioned to ensure it is suitable and in accordance with policy DM6 of the Local Plan.

Water Efficiency

6.26. To ensure that any proposed new dwellings will use water efficiently, Part G2 of the Building Regulations states that their projected water consumption must not exceed 125 litres per person per day. Policy DM4 of the Broads Local Plan requires this figure to be further limited to 110 litres per person per day.

6.27. In order to demonstrate compliance with Policy DM4 the applicants have carried out the water efficiency calculations in accordance with the Part G Building Regulations Methodology and the Department of Communities and Local Government Water Efficiency Guide. A condition can be attached to ensure construction is in accordance

with the calculations. The proposal is therefore considered to accord with policy DM4 of the Local Plan.

Highways

- 6.28. Although remote there is good vehicular access to the mill via a track from the main road. The road also serves the other properties on the island. The Highway Authority has no objection to the application. The application is therefore considered to accord with policy DM23 of the Local Plan .

Ecology

- 6.29. An ecology survey was submitted with the application as well as a habitat regulation assessment. The Broads Authority ecologist has confirmed they are satisfied that the survey and assessment was robust and have advised the proposed mitigations and enhancements are conditioned as per the survey.
- 6.30. As the proposal includes a replacement dwelling the site is subject to the Norfolk Recreation Avoidance and Mitigation Strategy (RAMS). The RAMS aims to reduce the impact of increased levels of recreational use on Habitat Sites (also called European Sites), due to new residential development in Norfolk and to provide a simple, coordinated way for developers to deliver mitigation for their developments.
- 6.31. Taking a coordinated approach to mitigation has benefits and efficiencies compared to project by project mitigation packages. The RAMS partnership approach has support from Natural England.
- 6.32. Any new (or in this case replacement) residential development within the Zone of Influence is required to mitigate the effects of the development and show how this will be achieved prior to approval of planning permission. In smaller development this is most efficiently achieved through payment of the RAMS contribution only. The contribution in this case is therefore £221.17, which must be paid prior to the issuing of the decision.
- 6.33. Therefore, subject to the mitigation, enhancements and RAMS payment being secured it is considered the proposal is acceptable in terms of impact on ecology and is in accordance with policies SP6 and DM13 of the Local Plan (2019).

Trees

- 6.34. An Arboricultural Impact Assessment and Tree Assessment was submitted with the application assessing all trees to be impacted. Some trees require removal to allow for the free movement and wind of the restored sails and to clear sight lines to the mill and restored pumphouse (T1, T2, T11, T12, T13, T14 T15, G2).
- 6.35. To mitigate the loss of T1, T2, T11, T12, T13, T14 T15, G2, small loss of grassland habitat and impacts on retained trees due to future increased tree surgery management, it is proposed to plant:
- 6 Common Alder

- 3 Crack Willow
- 3 Common Oak
- 10 Hawthorn
- 5 Wild Plum
- Two short sections of mixed native comprising 50% hawthorn, 10% Holly, 10% Dogwood, 10% Guelder Rose, 20% Field Maple

6.36. The Broads Authority tree officer has assessed the trees to be lost and mitigation planting and has no objection subject to the mitigation being undertaken in accordance with the documents submitted. It is therefore considered the impact on trees is in accordance with DM13 of the Local Plan.

Amenity

6.37. Given the remote location there would not be an adverse impact on the amenity of any other property as a result of the proposal. The proposal therefore accords with policy DM21 of the Local Plan (2019).

7. Conclusion

7.1. The proposal will secure the viability and long-term future of the listed mill and bring a new high-quality element into the landscape (the proposed dwelling), an improvement in terms of impact on flood risk with no adverse impact on highways, trees, amenity, ecology subject to mitigation and enhancement.

8. Recommendation

8.1. Approve Subject to Section 106 Agreement, RAMS payment, and conditions

8.2. Section 106 to ensure:

- the restoration of the mill is secured prior to the use of the dwelling,
- the extant permission is replaced by this up to date permission (and could therefore no longer be built in the future) and,
- the mill and dwelling are never sold separately

8.3. Planning application (BA/2023/0214/FUL) conditions:

- Standard time limit
- In accordance with plans and documents
- Historic building details including schedule of works to mill, schedule of works to engine house and photographic historic building record
- Materials and Additional details including: all new and reclaimed external materials, large scale joinery sections, barge soffits and rainwater goods, hard

landscaping, soft landscaping, details of flues, external lighting, signs and interpretation and details of proposed sewage treatment plant

- Flood Risk and Water Management including full details of, flood proofing measures, flood refuge measures, flood response plan and evacuation strategy, surface water drainage strategy, hydrostatic and hydrodynamic pressures calculations for dwelling and mill, and water consumption capacity cap.
- Ecology including enhancement and mitigation outlined in Appendix 3 of Ecology Survey (RAMS payment to be secured)
- Water efficiency

8.4. Informatives to add: Water Management Alliance (IDB) consent needed, RAMS payment of £221.17 (2024) required.

8.5. Listed Building Consent BA/2020/0271/LBC conditions:

- Standard listed building time limit
- In accordance with plans and documents
- Any damage to the fabric of the building to be made good
- Historic building details including updated schedule of works to mill, updated schedule of works to engine house and photographic historic building record
- Materials and Additional details including: all new and reclaimed external materials, large scale joinery sections, barge soffits and rainwater goods, hard landscaping, soft landscaping, details of flues, external lighting, signs and interpretation and details of proposed sewage treatment plant

9. Reason for recommendation

9.1. The proposal is considered to accord with policies, DM2, DM4, SP2, DM5, DM6, SP3, DM9, SP5, DM11, DM12, SP6, DM13, SP7, DM16, DM21, DM23, SP15, DM40, DM43, DM47 and SSMILLS and the NPPF. S66(1) and S72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 has also been considered in the determination of this application.

Author: Kayleigh Judson Heritage Planning Officer

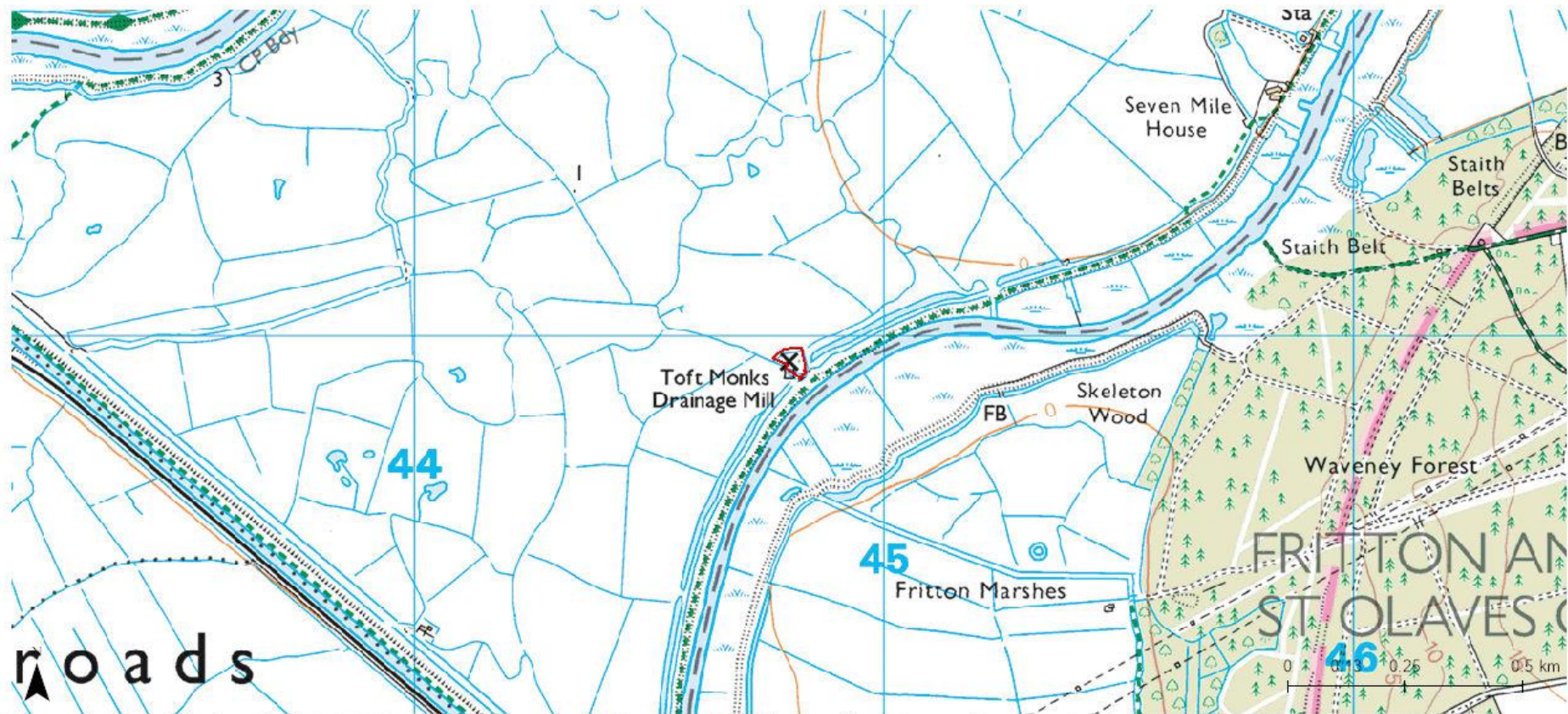
Date of report: 27 August 2024

Appendix 1 – Location maps

Appendix 2 – Full consultation responses

Appendix 1 – Location maps

BA/2023/0214/FUL & BA/2023/0215/LBC Toft Monks Mill, Haddiscoe Island, Haddiscoe



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Appendix 2 – Full consultation responses

Planning Application Responses BA/2023/0214/FUL

Parish Council

No response

District Member

No response

Broads Society

Initial response

The Broads Society generally supports the application because there is an extant planning permission (albeit granted in 1974) for residential accommodation associated with the wind pump. However, further information needs to be provided, in accordance with the requirements of Paragraph 194 of the NPPF, in order to fully assess the impact of the proposed new structures on the setting of the mill and whether the character and appearance of the Conservation Area will be preserved or enhanced. Until this information is received the Society reserves its full support.

Updated response

Given the support previously given to the scheme by the Authority's Historic Environment Manager, the Broads Society FULLY SUPPORTS this proposal

Highways

Initial response

Thank you for your recent consultation with respect to the above to which the Highway Authority raise no objection.

Updated response

Thank you for your consultation with respect to the above to which the Highway Authority raise no objection

Natural England

Initial response

Thank you for your consultation on the above dated 05 July 2023 which was received by Natural England on 05 July 2023. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE DESIGNATED SITES [EUROPEAN] – NO OBJECTION SUBJECT TO SECURING APPROPRIATE MITIGATION FOR RECREATIONAL PRESSURE IMPACTS ON HABITAT SITES (EUROPEAN SITES).

Natural England notes that the Habitats Regulations Assessment (HRA) has not been provided with the application. As competent authority, and before deciding to give

permission for the project which is likely to have a significant effect on a European Protected Site, you must carry out a HRA and adhere to its conclusions. For all future applications within the zone of influence identified by your authority, please only consult Natural England once the HRA has been produced.

FURTHER INFORMATION REGARDING RECREATIONAL PRESSURE IMPACTS ON HABITAT SITES (EUROPEAN SITES). Natural England considers that this advice may be used for all applications that fall within the parameters detailed below. This advice relates to proposed developments that falls within the 'zone of influence' (ZOI) for one or more European designated sites, such as Norfolk GIRAMS. It is anticipated that new residential development within this zone is 'likely to have a significant effect', when considered either alone or in combination, upon the qualifying features of the European Site due to the risk of increased recreational pressure that could be caused by that development and therefore such development will require an appropriate assessment. Your authority has measures in place to manage these potential impacts through a strategic solution which we have advised will (in our view) be sufficiently certain and effective in preventing adverse impacts on the integrity of those European Site(s) within the ZOI from the recreational impacts associated with such development. However, following the People Over Wind ruling by the European Court of Justice, mitigation may not be taken into account at screening stage when considering 'likely significant effects', but can be considered at appropriate assessment. In the light of this, these measures) should be formally checked and confirmed by your authority, as the competent authority, via an appropriate assessment in view of the European Site's conservation objectives and in accordance with the Conservation of Habitats & Species Regulations 2017 (as amended). Natural England is of the view that if these measures, including contributions to them, are implemented, they will be effective and reliable in preventing adverse effects on the integrity of the relevant European Site(s) from recreational impacts for the duration of the development proposed within the relevant ZOI. Providing that the appropriate assessment concludes that the measures can be secured [with sufficient certainty] as planning conditions or obligations by your authority , and providing that there are no other likely significant effects identified (on this or other protected sites) which require consideration by way of appropriate assessment, Natural England is likely to be satisfied that your appropriate assessments will be able to ascertain with sufficient certainty that there will be no adverse effect on the integrity of the European Site from recreational pressure in view of the site's conservation objectives. In this scenario, Natural England is unlikely to have further comment regarding the Appropriate Assessment, in relation to recreational disturbance.

Natural England should continue to be consulted on all proposals where provision of site specific SANGS (Suitable Alternative Natural Green Space) or other bespoke mitigation for recreational impacts that falls outside of the strategic solution is included as part of the proposal.

We would also strongly recommend that applicants proposing site specific infrastructure including SANGs seek pre application advice from Natural England through its Discretionary Advice Service. If your consultation is regarding bespoke site-specific mitigation, please reconsult Natural England putting 'Bespoke Mitigation' in the email header. Reserved Matters applications, and in some cases the discharge/removal/variation of conditions, where the permission was granted prior to the introduction of the Strategic Solution, should

also be subject to the requirements of the Habitats Regulations and our advice above applies.

Landscape advice

The proposed development is for a site within or close to a nationally designated landscape namely (The Broads) National Park. Natural England advises that the planning authority uses national and local policies, together with local landscape expertise and information to determine the proposal. The policy and statutory framework to guide your decision and the role of local advice are explained below. Your decision should be guided by paragraph 176 and 177 of the National Planning Policy Framework which gives the highest status of protection for the 'landscape and scenic beauty' of AONBs and National Parks. For major development proposals paragraph 177 sets out criteria to determine whether the development should exceptionally be permitted within the designated landscape. Alongside national policy you should also apply landscape policies set out in your development plan, or appropriate saved policies. The landscape advisor/planner for the National Park will be best placed to provide you with detailed advice about this development proposal. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the park's management plan, will be a valuable contribution to the planning decision. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to this type of development and its capacity to accommodate the proposed development. The statutory purposes of the National Park are to conserve and enhance the natural beauty, wildlife and cultural heritage of the park; and to promote opportunities for the understanding and enjoyment of the special qualities of the park by the public. You should assess the application carefully as to whether the proposed development would have a significant impact on or harm those statutory purposes. Relevant to this is the duty on public bodies to 'have regard' for those statutory purposes in carrying out their functions (section 11 A(2) of the National Parks and Access to the Countryside Act 1949 (as amended)). The Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.

Other advice

Priority habitats and Species Priority habitats and Species are of particular importance for nature conservation and are included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. A list of priority habitats and species can be found on Gov.uk. Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found here. Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Updated response

Thank you for your consultation on the above dated 3 April 2024, which was received by Natural England on the same date. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Habitats Regulations Assessment (HRA)

Natural England notes that the Habitats Regulations Assessment (HRA) has not been produced by your authority, but by the applicant (Glaven Ecology, November 2023). As competent authority, it is your responsibility to produce the HRA and be accountable for its conclusions. We provide the advice enclosed on the assumption that your authority intends to adopt this HRA to fulfil your duty as competent authority. Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process, and a competent authority should have regard to Natural England's advice.

Green Infrastructure and Recreational Avoidance Mitigation Strategy (GIRAMS)

The in combination impacts of recreational disturbance has not been addressed in the HRA. Norfolk Local Planning Authorities (LPAs) are working collaboratively to deliver a Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS) to ensure that the cumulative impacts of additional visitors arising from new developments of housing and tourism, to European sites, will not result in any adverse effects which cannot be mitigated. All Norfolk LPAs are collecting a tariff per new dwelling towards the strategic mitigation package, at the time planning permission is approved. It is Natural England's advice that your authority should consider whether this development qualifies for collection of the tariff should planning permission be granted.

Protected Landscapes

The proposed development is for a site within or close to a nationally designated landscape namely The Broads National Park. Natural England has concluded that impacts on the nationally designated landscape and the delivery of its statutory purposes to conserve and enhance the area's natural beauty wildlife and cultural heritage of the park; and to promote opportunities for the understanding and enjoyment of the special qualities of the park by the public, can be determined locally by the local planning authority, with advice from its landscape or planning officers. Natural England is not confirming that there would not be a significant adverse effect on landscape or visual resources or on the statutory purposes of the area, only that there are no landscape issues which, based on the information received, necessitate Natural England's involvement. We advise that the planning authority uses national and local policies, together with local landscape expertise and information to determine the proposal. The policy and statutory framework to guide your decision and the role of local advice are explained below. Your decision should be guided by paragraph 182 and 183 of the National Planning Policy Framework, which requires great weight to be given to conserving and enhancing landscape and scenic beauty within National Landscapes, National Parks, and the Broads and states that the scale and extent of development within all these areas should be limited. Paragraph 183 requires exceptional circumstances to be

demonstrated to justify major development within a designated landscape and sets out criteria which should be applied in considering this proposal. Alongside national policy you should also apply landscape policies set out in your development plan, or appropriate saved policies. The relevant local authority landscape or planning officers should be able to advise you based on knowledge of the site and its wider landscape setting, together with the aims and objectives of the area's statutory management plan. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to this type of development and its capacity to accommodate the proposed development. The statutory purposes of the National Park are to conserve and enhance the natural beauty wildlife and cultural heritage of the park; and to promote opportunities for the understanding and enjoyment of the special qualities of the park by the public. The Broads have additional purposes to promote their enjoyment by the public and protect the interests of navigation. You should assess the application carefully as to whether the proposed development would have a significant impact on or harm those statutory purposes. Furthermore, Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 places a duty on relevant authorities (which includes local authorities) in exercising or performing any functions in relation to, or so as to affect, land in a National Park, the Broads or an Area of Outstanding Natural Beauty in England, to seek to further the statutory purposes of the area. This duty also applies to proposals outside the designated area but impacting on its statutory purposes. The National Park's planning or landscape officers may be able to offer advice in relation to the duty, including on how the proposed development aligns with and contributes to delivering the aims and objectives of the area's statutory management plan. Further general advice on the protected species and other natural environment issues is provided at Annex A. If you have any queries relating to the advice in this letter, please contact me at gemma.clark@naturalengland.org.uk. Please consult us again once the information requested above, has been provided.

Further updated response

Natural England has previously commented on this proposal and made comments to the authority in our response dated 24 April 2024 reference number 471934. The advice provided in our previous response applies equally to this amendment. The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal. Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us

Environment Agency

Initial response

Flood Risk Our maps show the site lies within indicative fluvial flood zone 3b defined by the 'Planning Practice Guidance: Flood Risk and Coastal Change' as having a high probability of flooding. The proposal is for the restoration of wind pump, re-build of steam pump building, and creation of a new separate living accommodation, which is classified as a 'more vulnerable' development, as defined in Annex 3:Flood Vulnerability classification of the Planning Practice Guidance (PPG).

We object to the proposed development as it falls within a flood risk vulnerability category that is inappropriate to the Flood Zone in which the application site is located. The application is therefore contrary to the National Planning Policy Framework (NPPF) and planning practice guidance (PPG). We recommend that planning permission is refused on this basis.

Reason

The SFRA shows the site as indicative flood zone 3b and modelled flood data from the Broads 2008 model shows the 5% (1 in 20) year annual probability tidal flood level to be 2.122mAOD. This is greater than the crest level of the existing defences, which are at around 1.83mAOD, and the site could therefore be considered as functional floodplain, as it would be expected to flood during this event, even with the Environment Agency Icen House Cobham Road, Ipswich, IP3 9JD. Customer services line: 03708 506 506 www.gov.uk/environment-agency End presence of defences. It should also be noted that in August 2022 the definition of functional floodplain was updated as 'land having a 3.3% or greater annual probability of flooding, with any existing flood risk management infrastructure operating effectively'. We do not have flood levels for the 3.3% annual probability event within our current models but confirm that this level would be greater than the 5% flood level used above to show the site would flood in this event. It is your responsibility to confirm whether the site is considered to be flood zone 3b. If this is the case, then 'more vulnerable; development should not be permitted, according to table 2 of the PPG: Flood Risk and Coastal Change.

If you are minded to approve the application contrary to this advice, we request that you contact us to allow further discussion and/or representations from us in line with the Town and Country Planning (Consultation) (England) Direction 2009. Permitting In accordance with The Environmental Permitting (England and Wales) (Amendment) (No.2) Regulations 2016, Schedule 25, Part 1, these works may require a Flood Risk Activity Permit. The applicant should apply for a Flood Risk Activity Permit. Information about Flood Risk Activity Permits, and application forms, can be found here; <https://www.gov.uk/guidance/flood-risk-activitiesenvironmental-permits>. Completed application forms should be sent to FDCCoastal@environment-agency.gov.uk. Flood defences Any permission should have the following informative: 'The concrete wall and embankment riverside of the mill and access track are flood defence assets. The EA will require unrestricted access to these for inspection and maintenance.'

Updated response

Thank you for the consultation dated 03 April 2024. We have reviewed the documents as submitted are maintaining our objection to this proposal for the Flood Risk issues raised in the relevant section below. Further details, such as on how to overcome our objection, are contained within this section.

Flood Risk Strategic Flood Risk Assessment (SFRA) and Flood Risk Supplementary Planning Document

The Broad Authority's Strategic Flood Risk Assessment (SFRA) shows the site as being in indicative Flood Zone 3b, with modelled flood data from the Broads 2008 model showing

the 5% (1 in 20) year annual probability tidal flood level to be 2.122m AOD. It should be noted that in August 2022 the definition of functional floodplain was updated as 'land having a 3.3% or greater annual probability of flooding, with any existing flood risk management infrastructure operating effectively'. We do not have flood levels for the 3.3% annual probability event within our current models but confirm that this level would be greater than the 5% flood level used above to show the site would flood in this event. These flood levels are greater than the crest level of the existing defences, which are at around 1.83m AOD, and the site could therefore be considered as functional floodplain, as it would be expected to flood during this event, even with the presence of defences. It is your responsibility to confirm whether the site is flood zone 3b. Your Flood Risk Supplementary Planning Document confirms that on brownfield sites 'if flood waters which inundate the site in a 1:20 (5%) annual probability event can pass under or through a building or sit on land this will be defined as functional floodplain'. Considering the height of existing flood defences at the site compared to modelled tidal flood levels, we consider the site would be inundated during the 1:30 (3.33%) flood event. Table 2 of the PPG: Flood Risk and Coastal Change confirms that 'more vulnerable' development should not be permitted within flood zone 3b. We note there is an extant permission dating back to 1974 which could be built and appreciate you will take this into consideration when making your decision. However, this portion of land functions as floodplain and any development within it has the potential to increase flood risk on and off site, which would not meet part c of the exception test. Flood Risk Assessment Notwithstanding the comments above relating to the fundamental acceptability of development within flood zone 3b, for which you are the decision-making authority, we have the following comments relating to the safety of development at this location which we consider would need addressing further to ensure safe development.

Benefit of Defences

The site benefits from the presence of defences, but these would be expected to overtop within the lifetime of the development for both the 1% and 0.1% fluvial flood events and current day tidal events meaning the flood risk at the site is an actual risk, expected to occur over the development lifetime. The proposal is for a single-story dwelling, which is proposed to be constructed on a pad that would become buoyant if the site floods. The pad would be secured by piles at each corner, to a level of 3.29m AOD. The floating nature of the building has the potential to minimise the impacts of flooding, by allowing it to rise above the floodwater. Provision of Refuge Provision of refuge above the flood level is wholly dependent upon the structure being capable of floating and it is not within our remit to endorse the mechanics of the structure. If you are minded to grant planning permission, you should be satisfied that the structure has been designed to function as intended to ensure the safety of occupants. On fluvial and tidal floodplains, the floodwater's depth, velocity and the presence of moving debris will influence the overall safety of the design. During a flood, debris such as large branches or cars that are carried in the floodwater can hit the structure below or above the waterline. At high velocities that could damage the structure, including the under-croft area or tanks that provide the floatation. If the structure fails to rise, then the building will not have the required refuge within it to satisfy the safety requirements of the PPG. After a flood the structure will settle back down upon its foundations. However, if debris has come to rest underneath, this will be trapped, potentially meaning the house does not settle evenly. This can cause structural stress and also make it very challenging to remove the debris. The design would also need to ensure its anchorage mechanism can

withstand the floodwater velocities. There are also potential concerns around the long-term maintenance of the structure, and you would need to be satisfied that the structure can be maintained over its lifetime. Planning Policy Guidance (PPG) Paragraph 047 of the Planning Policy Guidance confirms that:

- ‘Access considerations should include the voluntary and free movement of people during a ‘design flood’, as well as the potential for evacuation before a more extreme flood, considering the effects of climate change for the lifetime of the development. Access and escape routes need to be designed to be functional for changing circumstances over the lifetime of the development’,
- ‘ideally access routes would be provided above design flood levels, and where they are not limited depths of flooding may be acceptable if it is considered this can be made safe’.

The FRA does not provide details of the nature of flooding at the site, in terms of the speed in which flooding could occur, the duration of flooding, or the flood hazards associated with the depths and velocity of flood water at the site, and this should be provided in any future correspondence to inform the emergency plan. The FRA does confirm that flood depths at the site would be between 2 and 3 metres, which according to Table 13.1 of the flood risks to people document (FD2320/TR2 (publishing.service.gov.uk)) would present a danger for all people (e.g. there will be danger of loss of life for the general public and the emergency services). Paragraph 005 of the PPG states that ‘the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood (0.1% annual probability of flooding with allowance for climate change)’ should be considered. During a design flood the FRA confirms there could be 2-3 metres of flood water across the site, and you should consider whether this risk of flooding can be appropriately mitigated for when considering whether the application meets the safety requirements of the exception test. The PPG requires that off-site flood risks are not increased as a result of development. The building has been designed to float and consideration must be given to whether any water would be displaced by the structure before it becomes buoyant and what the impacts would be to the site and surrounding area. Any losses of floodplain storage prior to the structure becoming buoyant, or once it is floating, should be compensated for to ensure local flood risk is not increased.

Overcoming our Objection

If it can be justified that the site is not considered to be functional floodplain, based upon modelled flood levels and consideration of the evidence within your SFRA and SPD, and development is therefore considered appropriate to the flood zone, then in order for the exception test to be passed the applicant can overcome our objection through demonstrating the development can be made safe, by:

- Demonstrating that a safe route of access and egress can be achieved in accordance with FD2320, up to the 1% (1 in 100) fluvial and 0.5% (1 in 200) tidal annual probability with climate change flood events. Or if the applicant demonstrates that a safe route of access/egress is not possible this element could be mitigated by an acceptable emergency flood plan submitted to you that deals with matters of evacuation and refuge to demonstrate that people will not be exposed to flood hazards.
- Ensuring that there will be no loss of flood storage capacity on site. The FRA should demonstrate that the development will not increase risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved, we are likely to maintain our objection to the application.

We look forward to being re-consulted following the submission of amended development proposals. If you are minded to approve the application contrary to this advice, we request that you contact us to allow further discussion and/or representations from us in line with the Town and Country Planning (Consultation) (England) Direction 2009.

Additional information

Safety of Building

The development has been designed to provide refuge above the predicted flood levels. Given that refuge is identified as a fallback mitigation measure it is important that the building is structurally resilient to withstand the pressures and forces (hydrostatic and hydrodynamic pressures) associated with flood water, as per the requirements of paragraph 005 of the PPG. We advise that supporting information and calculations are submitted to you to provide certainty that the buildings will be constructed to withstand these water pressures. This is of particular importance with this application which requires the structures to be able to float with rising and falling water levels and failure to do so could result in internal flooding of the development, which would not meet the requirements of the PPG.

Safe Access During a flood, the journey to safe, dry areas completely outside the 1% (1 in 100) fluvial and 0.5% (1 in 200) tidal annual probability event with climate change floodplain would involve crossing areas of potentially fast flowing water. Those venturing out on foot in areas where flooding exceeds 100 millimetres or so would be at risk from a wide range of hazards, including for example unmarked drops, or access chambers where the cover has been swept away. Safe access and egress routes should be assessed in accordance with the guidance document Defra/EA Technical Report FD2320: Flood Risk Assessment Guidance for New Development. Where safe access cannot be achieved an emergency flood plan that deals with matters of evacuation and refuge should demonstrate that people will not be exposed to flood hazards. The emergency flood plan should be submitted as part of the FRA and will need to be agreed with yourselves.

Emergency Flood Plan

Where safe access cannot be achieved, or if the development would be at residual risk of flooding in a breach, an emergency flood plan that deals with matters of evacuation and refuge should demonstrate that people will not be exposed to flood hazards. The emergency flood plan should be submitted as part of the FRA and will need to be agreed with the Local Council. We trust this advice is useful.

Further updated response

Flood Risk

Our position We have reviewed the documents as submitted, including the revised flood risk assessment, prepared by Ellingham Consulting Limited, referenced ECL1043b/HOWES DESIGNS, dated July 2024 and are maintaining our objection to this proposal on flood risk grounds. We understand the existing extant permission could allow for a 4-bed dwelling to be constructed, connected to the existing mill. This building would not be single storey in nature and would provide the required refuge above the extreme (0.1%) flood level,

inclusive of climate change. The latest proposal does not appear to provide the same level of mitigation and could put site users at increased risk.

Functional floodplain

The comments relating to the designation of land as functional floodplain in our previous response remain. As the decision-making authority, it is for you to decide whether the land functions as functional floodplain, or not. Your Strategic Flood Risk Assessment (SFRA) defines the land as indicative functional floodplain. As discussed within the Flood Risk Assessment (FRA), the site does benefit from the presence of flood defences, which have a crest level of around 1.3.AOD – 2.64mAOD. Cont/d.. 2

Flood levels are detailed in table 1 below, which can be compared to defence levels to understand where flooding would be expected. The cells in grey in the below table show where flood levels could exceed the defence level. It can be seen that the defences are above the fluvial flood levels for the 5%, 1% and 0.1% flood events and below the tidal flood levels for the 5%, 1% and 0.1% current day flood events. This means that during a tidal flood, excluding climate change, the site would be expected to flood.

When considering climate change, the defences would be expected to be exceeded during the 5%, 1% and 0.1% climate change events in both the fluvial and tidal flood scenarios. Paragraph 165 of the NPPF states that "Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future)". Climate change should therefore be taken into account in the decision-making process and in consideration of whether the site is defined as flood zone 3b or not.

Extant Permission

We note the footnote provided by the case officer dated 26/03/2024 which confirms that due to an extant permission, dating back to 1974, which has been started, the application could be considered as a replacement dwelling rather than a new dwelling. The 1974 permission allowed for a 4-bedroomed dwelling attached to the mill. The current application is for a two-bedroomed single storey dwelling, separate to the existing mill building. It is not clear whether the footprint of the dwelling with extant permission is the same, or smaller/larger than the proposed dwelling. We understand that a building could be constructed at this location based on the 1974 permission, but you may want to consider whether the footprint of the more recent application would be larger or not than that already approved when considering compensatory storage requirements, which currently have not been addressed. It is also not clear whether there would have been internally accessible access to the mill itself from the 1974 permission, which would have allowed for refuge within the building or not. Whilst the latest proposals has provision for less bedrooms than the extant permission, the latest proposal is reliant upon residents being able to leave the new building and access the mill to get to upper floors above the flood level. Generally, we would expect refuge to be internally accessible without the potential need to enter floodwater to reach it, which could be the case if site users have to make their way to the mill.

Floor levels

The proposed building is no longer being designed to rise and fall with floodwaters and is instead proposed to be raised 0.6m above surrounding ground levels. The finished floor level has not been provided, but comparison of the topographical survey to flood levels indicates that the building would flood internally during the design flood event, potentially by over 1 meter. We do not normally accept flooding on the ground floor of dwellings which are expected to flood but design within the developments lifetime. We acknowledge that the extant permission may suffer with the same level of flooding on the ground floor, although it appears that access to the mill would have been internally available (which is not the case for the latest proposal), meaning the latest proposal could be putting site users at greater risk if flooding were to occur. Consequently, we would only be able to consider removing our objection if the local council inform us in writing that the development does not result in additional footprint within the floodplain to that which can already lawfully be constructed and they accept that the flood risk to the future occupants, including ground floor flooding and no internally accessible refuge within the building to be acceptable and safe for the proposed more vulnerable development, as they consider the proposed mitigation measures are sufficient to ensure the safety of the occupants and development.

Additional information

Safety of Building

The development has been designed to provide refuge above the predicted flood levels within an adjacent building on site. Given that refuge is identified as a fallback mitigation measure it is important that the building is structurally resilient to withstand the pressures and forces (hydrostatic and hydrodynamic pressures) associated with flood water, as per the requirements of paragraph 005 of the PPG. We advise that supporting information and calculations are submitted to you to provide certainty that the mill building will be constructed to withstand these water pressures. This is of particular importance with this application which requires the structures to be able to float with rising and falling water levels and failure to do so could result in internal flooding of the development, which would not meet the requirements of the PPG. Provision of refuge above the flood level is wholly dependent upon residents being able to get to another building on site (within the existing mill building) and consideration should be given to the possible flood hazards at the site for any users attempting to reach the mill building. Flood levels on site, based upon comparison of the topographical survey and modelled flood levels would be considered to represent a danger for all people, including the emergency services.

Safe Access

During a flood, the journey to safe, dry areas completely outside the 1% (1 in 100) fluvial and 0.5% (1 in 200) tidal annual probability event with climate change floodplain would involve crossing areas of potentially fast flowing water. Those venturing out on foot in areas where flooding exceeds 100 millimetres or so would be at risk from a wide range of hazards, including for example unmarked drops, or access chambers where the cover has been swept away. Safe access and egress routes should be assessed in accordance with the guidance document Defra/EA Technical Report FD2320: Flood Risk Assessment Guidance for New Development. Where safe access cannot be achieved an emergency flood plan that deals with matters of evacuation and refuge should demonstrate that people will not be End 4 exposed to flood hazards. The emergency flood plan should be submitted as part of the FRA and will need to be agreed with yourselves.

Emergency Flood Plan

Where safe access cannot be achieved an emergency flood plan that deals with matters of evacuation and refuge should demonstrate that people will not be exposed to flood hazards. The emergency flood plan should be agreed with the Local Council in consultation with emergency planners. We trust this advice is useful.

Local Lead Flood Authority

Initial response

Thank you for your consultation on the above application received on 26 July 2023. However, having reviewed the application as submitted, it appears that this development would be classed as minor development (see section A4.3 in the Annex of our current guidance.) <https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/flood-and-watermanagement/guidance-on-norfolk-county-councils-lead-local-flood-authority-role-as-statutoryconsultee-to-planning.pdf> If there is an incident of flooding that has been investigated by Norfolk County Council in the vicinity of the site, further information on key findings and recommendations are publicly available on our website (<https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-watermanagement/flood-investigations>). The Local Planning Authority would be responsible for assessing the suitability for any surface water.

Updated response

Thank you for your consultation on the above site, received on 3 April 2024. I can confirm that the County Council as Lead Local Flood Authority (LLFA) has no comments to make at this time.

In providing this substantive response, the LLFA is not currently able to carry out any review of the submitted documents or give any formal advice to the LPA for this consultation. As such, it should not be assumed that there is no impact associated with the proposed development in relation to surface water flood risk and drainage.

Internal Drainage Board (Water Management Alliance)

Initial response

The Board has been made aware of the above application and wishes to make the following comments.

The site is within the Internal Drainage District (IDD) of the Waveney, Lower Yare and Lotheringland Internal Drainage Board (IDB) and therefore the Board's Byelaws apply. Whilst the Board's regulatory process (as set out under the Land Drainage Act 1991 and the Board's Byelaws) is separate from planning, the ability to implement a planning permission may be dependent on the granting of any required Land Drainage Consents. The Board's Officers have reviewed the documents submitted in support of the above planning application. Officers have noted works which may require Land Drainage Consent from the Board as outlined in the table below and detailed overleaf. The proposed works are unlikely to be acceptable to the Board (in accordance with the policies outlined within the Board's Planning and Byelaw Strategy).

Resultantly, the Board currently objects to this planning application. The reason for the Board's objection is to avoid likely conflict between the planning process and the Board's operations and regulatory regime (as outlined below) and to prevent increased flood risk in accordance with National Planning Policy Framework. The annexe at the end of this letter outlines the Board's regulatory function and how to apply for Land Drainage Consent.

Byelaw / Section of Act Description Requirement
Byelaw 3 Discharge of water to a watercourse (treated foul or surface water) Consent may be required
Section 23, Land Drainage Act 1991 Alteration of a watercourse Consent not currently required,
Byelaw 10 / 17 Works within 7 metres of a Board maintained watercourse Consent not currently required,
Waveney, Lower Yare and Lothingland Internal Drainage Board Board's Access.

The Board's catchment inlet is located within the site boundary. The Board therefore requires access and are concerned that the works in the vicinity of the inlet such as the proposed boat mooring may impede this. Without further information regarding the works to or near the inlet, the Board currently objects to this application. Byelaw 3 (Surface Water) I cannot see that the applicant has identified a drainage strategy for the site within their application. We recommend a drainage strategy is provided for the site. If the applicant proposes to discharge surface water to a watercourse, consent would be required under Byelaw 3. Please note that we recommend that any discharge is in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), therefore the Board is unlikely to grant consent for discharges in excess of greenfield rate. Byelaw 3 (Treated Foul Water) I note that the applicant intends to treat foul waste using a package treatment plant, however I cannot see that the applicant has indicated how they intend to dispose of treated foul water from this development. If the applicant proposes to discharge treated foul water to a watercourse, consent would be required under Byelaw 3. Section 23, Land Drainage Act 1991 I note the presence of watercourses which are not maintained by the Board (riparian watercourses) adjacent to the site boundary. Whilst not currently proposed, should the applicant's proposals change to include works to alter the riparian watercourse, or if works are proposed to alter the watercourse at any time in the future, consent would be required under the Land Drainage Act 1991 (and byelaw 4). I note the presence of a Board Maintained watercourse (DRN232P0201) near the site boundary. Whilst not currently proposed, should the applicant's proposals change to include works to alter the watercourse, or if works are proposed to alter the watercourse at any time in the future, consent would be required under the Land Drainage Act 1991 (and byelaw 4). Byelaws 10 and 17 Whilst not currently proposed, should the applicant's proposals change to include works within 7 metres of, or and/or works to install services within, make excavations within, or otherwise alter the banks of the aforementioned Board Maintained watercourse, or if works within 7 metres of the watercourse are proposed at any time in the future, consent would be required under Byelaws 10 and 17. Please see the supplementary information overleaf for further detail on the Board's policy and consenting process. If, following review of our comments and supporting policy documents linked below, you wish to discuss any of the requirements I have raised, please contact the Board using the details at the head of this letter.

Updated response

Thank you for your re-consultation on this application following the submission of new documents. Please see below the Board's amended comments including the removal of our objection.

The site is within the Internal Drainage District (IDD) of the Waveney, Lower Yare and Lothingland Internal Drainage Board (IDB) and therefore the Board's Byelaws apply. Whilst the Board's regulatory process (as set out under the Land Drainage Act 1991 and the Board's Byelaws) is separate from planning, the ability to implement a planning permission may be dependent on the granting of any required Land Drainage Consents. The Board's Officers have reviewed the documents submitted in support of the above planning application. Officers have noted works which may require Land Drainage Consent from the Board as outlined in the table below and detailed overleaf.

Please be aware of the potential for conflict between the planning process and the Board's regulatory regime. Where consents are required, the Board strongly recommends that these are sought from the Board prior to determination of this planning application. The annexe at the end of this letter outlines the Board's regulatory function and how to apply for Land Drainage Consent. Our ref: 23_23000_P 29/04/2024 Your ref: BA/2023/0214/FUL Site Location: Toft Monks Mill Haddiscoe Island Haddiscoe Summary of Proposal: Restoration of wind pump, re-build steam pump building, create new separate living accommodation removing this from the wind pump. External works. Byelaw / Section of Act Description Requirement Byelaw 3 Discharge of water to a watercourse (treated foul or surface water) Consent may be required Section 23, Land Drainage Act 1991 Alteration of a watercourse Consent not currently required, Byelaw 10 / 17 Works within 7 metres of a Board maintained watercourse Consent not currently required.

Waveney, Lower Yare and Lothingland Internal Drainage Board Board's Access.

The Board's catchment inlet is located within the site boundary. The Board therefore requires access and were previously concerned that the works in the vicinity of the inlet such as the previously proposed boat mooring may impede this. Following the removal of the boat mooring element of the proposal as shown in drawing number PL01 Rev C (Howes Designs, 25./09/2022), the Board no longer objects to this application. Byelaw 3 (Surface Water) I cannot see that the applicant has identified a drainage strategy for the site within their application. We recommend a drainage strategy is provided for the site. If the applicant proposes to discharge surface water to a watercourse, consent would be required under Byelaw 3. Please note that we recommend that any discharge is in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), therefore the Board is unlikely to grant consent for discharges in excess of greenfield rate. Byelaw 3 (Treated Foul Water) I note that the applicant intends to treat foul waste using a package treatment plant, however I cannot see that the applicant has indicated how they intend to dispose of treated foul water from this development. If the applicant proposes to discharge treated foul water to a watercourse, consent would be required under Byelaw 3. Section 23, Land Drainage Act 1991 I note the presence of watercourses which are not maintained by the Board (riparian watercourses) adjacent to the site boundary. Whilst not currently proposed, should the applicant's proposals change to include works to alter the riparian watercourse, or if works are proposed to alter the watercourse at any time in the future, consent would be required under the Land Drainage Act 1991 (and byelaw 4).

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Broads Authority Ecologist

Initial response

Ecology summary

All mitigation and enhancements stated in the Ecological Survey must be followed.

Habitat and species surveys required

Ecology Survey has been conducted.

Biodiversity Mitigation

All mitigation proposals in the ecological report should be followed this includes physical mitigation and timeline for when works should occur. Appendix 3 of the ecological report shows areas where mitigation should be focused on site.

Biodiversity Enhancements

All enhancements in section 7 should be implemented. 7.1 – Planting scheme should include plants from the given list from plants to native hedge species. 7.1.1 Birds – 3 mixed sized bird boxes should be put up around the site. The report gives suggestions on which ones. 7.2.1 Bats – 3 boxes should be placed around the property. The opportunities plan (Appendix 3 of the ecological report) shows where all mitigation and enhancements are suggested.

Conclusion

There are no ecological concerns as long as all mitigation and enhancements followed from the Ecological Survey.

Updated response

Ecology summary

All conditioned mitigation and enhancements must be followed. The shadow HRA shows negligible impact of the proposed works and we concur with the assessment. Habitat and species surveys required Ecological Impact Assessment has been conducted.

Biodiversity Mitigation

Condition 1 - All mitigation proposals in the ecological report should be followed this includes physical mitigation and timeline for when works should occur. Appendix 3 of the Ecological Impact Assessment report shows areas where mitigation should be focused on site. Condition 2 - Pollution Prevention A method statement to ensure best practice measures are set in place to contain any sediment or chemical run-off during the construction phase. Condition 3 – Biosecurity The Biosecurity protocol ‘Check, Clean, Dry’ should be observed at all times during the development.

Biodiversity Enhancements

Condition 4 - All enhancements in section 7 of the Ecological Impact Assessment should be implemented. 7.1 – Planting scheme should include plants from the given list from plants to native hedge species. 7.1.1 Birds – 3 mixed sized bird boxes should be put up around the site. The report gives suggestions on which ones. 7.2.1 Bats – 3 boxes should be placed around the property. The opportunities plan (Appendix 3 of the ecological report) shows where all mitigation and enhancements are suggested.

Conclusion

There are no ecological concerns as long as all mitigation and enhancements followed.

Broads Authority Tree Officer

Initial response

Many thanks for the attached which I have now reviewed and can offer the following. Whilst the proposed development/restoration of the Mill does require the loss of a number of trees in order to allow sufficient space for the operation of the pump sails and the advice of the millwright, there is replacement planting proposed to mitigate the loss which I deem to be acceptable.

My only area of concern is the proposed retention of the Oak tree T10, which is proposed. Whilst it may be possible, with the proposed tree protection and method statement to protect this tree during construction of the dwelling, I do have concerns about the high growth potential of the tree and its proximity of the building and the likely problems this may cause future residents with regards overhanging limbs, shading and access around the building. Given this, I would suggest that there are two options, either the position of the dwelling be reconsidered in order to move it further from the tree to address the issues detailed above or, the tree could be felled and a suitably sized replacement Oak planted in a more appropriate position in relation to the proposed building.

My preference would be the relocation of the building, but perhaps you could discuss this with the applicant to see if this is possible. I hope this is of some assistance. If you or the applicant would like to discuss this further, please do call/email.

Updated response

Further to your request I have revisited the above-mentioned site with the revised layout and revisited the Arboricultural Impact Assessment. Whilst I have no fundamental objections to the proposed development, that will no doubt enhance the site in the long-term, the submitted Arboricultural report relates to the previous layout and the references the plans and associated tree impacts relating to the original submission. Given this, I would ask that you request the Arboricultural report be updated and resubmitted to reflect the latest proposal and associated impacts. As always, I am happy to discuss this with the applicant/agent if they wish.

Further updated response

Further to your recent request I have reviewed the revised Arboricultural submission and can confirm that I have no objections to the proposed development as long as it is undertaken in line with the Chapter 4 (Arboricultural Method Statement), of the revised Arboricultural submission dated July 2024. If this could be listed as an approved document this should suffice without the need for a bespoke condition.

Broads Authority Landscape Officer

Initial response

Landscape Character considerations:

This site falls within the Haddiscoe Island Landscape Character Assessment (LCA) area number 18, the site sits on the edge of the river, within the River and Ronds landscape type. The LCA for the area highlights the exceptional depths of the reed ronds in the area as a notable characteristic. With reference to enclosure scale and pattern, the LCA recognises Haddiscoe Island as “a large scale, open, flat marshland landscape which is bounded by embanked rivers of the Yare and Waveney lying metres above the low lying grazing land. It is a simple landscape of muted colour palette, with comparatively little variation in light and reflectivity, due to the relative absence of features breaking up skylines or casting shadows.” The extensive views and uninterrupted skylines are also recognised, noting that these are only interrupted by drainage mills and limited vegetation. The Toft Monks mill itself is noted within the LCA, as one of four in the area that are considered significant features within the landscape, stating “visually the drainage mills on the island combine with those on the adjacent marshes adding to their significance in views of the area as a whole.”

The significance of the mills, and their importance within the landscape is also prioritised as an opportunity within this LCA, which recognises their national and international importance as landscape and historic features, acknowledging that new purposes need to be found for some of the structures to ensure their survival for future generations.

Proposed development: The proposed development contains two aspects that could alter the way in which the site is representative of the key and special characteristics of this LCA. - The removal (and replacement planting) of trees to facilitate restoration of the mill - The introduction of new built form Having reviewed the application I believe the effects of the proposal can be established from the submitted information and do not believe that any additional assessments such as an LVIA are required to do this. Firstly, taking the removal

(and replacement planting) of trees to facilitate the restoration of the mill, considering that the LCA recognises that vegetation is limited in the area, and in this instance we know that it would not have existing in the current location when the mill was in working order (as it would have prevented the movement of the sails), I consider the removal of the trees to be acceptable in landscape terms, and that there is a benefit in doing so as it restores the original landscape character of the immediate setting of the mill. In landscape terms the introduction of additional vegetation will result in a minor negative impact, as this is not characteristic of the LCA, and the overall quantity of trees on site will increase. However, the replacement planting is necessary to mitigate the loss of trees, and is broadly shown away from the mill and main ditch and therefore improved visibility of the mill will result overall.

The introduction of built form is clearly uncharacteristic within the receiving landscape, as noted by the LCA generally an absence of settlement and built features, however, the importance of conservation and restoration of the mills is also strongly recognised within the LCA and an openness to the need for an economic incentive acknowledged. Given that the building has been designed to minimise any visual impact on the receiving landscape, and positioned to relate well to the mill and benefit from screening of the existing vegetation, I have no objection to the proposal. General comments: The application includes a proposal for a single new wind turbine to be located on the site, my understanding is that this is currently contrary to national and local policy, given that no areas within the Broads are identified within the development. However, purely in landscape terms, I have no objection to the appearance of the proposed wind turbine, and do not believe it would have any significant visual impact on the surroundings, any visibility of it would be in the context of the overall site narrative – which I believe has been dealt with sensitively in terms of how people perceive landscape and landscape change.

Recommendations: The green roof and living wall elements of the proposal are ambitious, and clearly offer ecological benefits, along with reducing the potential visual impact of the proposal, however if an approval is given for this application, the establishment and maintenance of these elements of the structure will be key to its success. Management of new planting also needs to be considered to prevent self-seeding and gradual encroachment on the site, which could lead to an uncharacteristic amount of vegetation in the area. I therefore recommend that conditions are applied to any approval given in order to secure the effective establishment and management of these elements.

Updated response

Thank you for taking the time to explain some of the context around these amendments to me. Whilst I am open minded and accept that the site can accommodate the increased massing of the building, and understand the reasons that the building is now raised from the ground level, I do still have some concerns over the design and its potential impact on the receiving landscape. The approach of creating a green roof, and living wall to the north east elevation would be a mitigation measure to minimise the impact of the building on the surrounding landscape. However I'm interested to understand more about how this will be achieved. Could you applicant provide some examples please of successful schemes where a green roof has been used in this wrap around design, extending from roof to wall? Whilst I think it is well intentioned, I'm unsure about the deliverability of this and would imagine the

build up systems for the wall and roof would be different and that the seamless curve would be difficult to achieve. I'm also interested to know a little more about the proposed planting would be, and if this would differ on the roof to the wall. This is important to consider now, as if we cannot be reassured that the living elements of the building would be successful, I would be looking for some alternative design suggestions that might offer the ability to weather and reference the surrounding landscape (thatch for example). I hope that makes sense and is useful to moving the discussion forward.

Further updated response

Thank you for re-consulting us on this application and providing the additional information and images. These do demonstrate that the concept is possible and I therefore have no landscape objections, on the basis that the proposed design is appropriate to mitigate impacts on the wider landscape. I would ask that a condition is applied please, to secure details of the planting mixes that will be used on the green roof and walls of the building. This is to ensure that the mixes are appropriate to the surrounding landscape, and in the hope that we will have something more akin to a naturalistic mosaic of plants, rather than the contemporary structural approach that was taken in the example with highly contrasting textures and colours.

Listed Building Application Responses BA/2023/0215/LBC

Historic England

Thank you for your letter of 5 July 2023 regarding the above application for listed building consent. Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application. We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at <https://historicengland.org.uk/advice/find/> It is not necessary to consult us on this application again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request.

Joint Committee of Amenity Societies (SPAB in this instance)

Initial response

Background to this response

The Society for the Protection of Ancient Buildings Mills Section is a statutory body in respect to proposals affecting listed buildings in the case of windmills and watermills. The SPAB Mills Section is supportive of the proposed plans, as the proposed new building will be located at a distance away from the mill. If possible, we would like to find out who will undertake the repair of the mill.

Recommendation

The SPAB Mills Section recommends acceptance of the proposed plan

Updated response

Background to this response The Society for the Protection of Ancient Buildings Mills Section is a statutory body in respect to proposals affecting listed buildings in the case of windmills and watermills. The SPAB Mills Section is supportive of the proposed plans, as the proposed

new building will be located at a distance away from the mill, which will allow the mill to be fully operational again once it has been repaired

Historic Environment Services

Initial response

The proposed development affects a heritage asset comprising a former 19th century or earlier drainage mill and late 19th century engine house. The proposed works, although welcome, will alter and affect the significance of the heritage asset which is worthy of recording prior to its restoration. If planning permission is granted, we therefore ask that this be subject to condition for a programme of archaeological work in accordance with National Planning Policy Framework. Ministry of Housing, Communities and Local Government (2021). para. 205. We suggest that the following condition be imposed:- No development shall take place within the site until the applicant, or their agents or successors in title, has secured the implementation of a programme of historic building recording, the results of which have been submitted by the applicant and approved in writing by the local planning authority. In this instance the programme of historic building recording will comprise a photographic survey of the structures for which a brief is available from the Norfolk County Council Historic Environment Team. Please note that we now charge for our services. If you have any questions or would like to discuss our recommendations, please don't hesitate to get in contact .

Updated response

Thank you for consulting with us about the above amended planning application. Our previous advice remains valid:- 'The proposed development affects a heritage asset comprising a former 19th century or earlier drainage mill and late 19th century engine house. The proposed works, although welcome, will alter and affect the significance of the heritage asset which is worthy of recording prior to its restoration. If planning permission is granted, we therefore ask that this be subject to condition for a programme of archaeological work in accordance with National Planning Policy Framework. Ministry of Housing, Communities and Local Government (2021). para. 205. We suggest that the following condition be imposed:- No development shall take place within the site until the applicant, or their agents or successors in title, has secured the implementation of a programme of historic building recording, the results of which have been submitted by the applicant and approved in writing by the local planning authority. In this instance the programme of historic building recording will comprise a photographic survey of the structures for which a brief is available from the Norfolk County Council Historic Environment Team. Please note that we now charge for our services.' If you have any questions or would like to discuss our recommendations, please contact us at hep@norfolk.gov.uk.

Further updated response

Thank you for consulting with us about the above amended Listed Building planning application. We have no comments to make.

Broads Authority Historic Environment Manager

Initial response

Toft Monks Mill is a grade II listed drainage pump, situated on Haddiscoe Island and within the Halvergate Marshes Conservation Area. It is likely to date from the mid-19th century. The remains of a later 'Humpback' vertical steam pump are also retained on the site, along with the foundations of its engine house and the pump is identified in the Halvergate Marshes Conservation Area Appraisal as a rare survival. The mill is in a relatively sound condition, although some elements are currently missing, including the stocks, sails, fantail and some internal machinery and the cap is an inaccurate replica of the original, all of which erode its heritage value and character. The proposal is thorough in its approach and the repairs will ensure that the mill does not continue to deteriorate. The proposal to rebuild the engine house is also considered appropriate and as well as providing protection for the 'Humpback' steam pump, will also enable some heritage interpretation of the mill which will be beneficial. It is considered that the proposal meets the requirements of Local Plan Policy SSMILLS and Policy DM11. As well as Toft Monks Mill being significant in its own right as a good example of a mid-19th century drainage pump, the mill is an important landscape feature and as such has some group value with the other mills and positively contributes to the significance of the conservation area. It is considered that the proposal to repair and restore the external appearance of the mill will ensure that it further enhances the character and appearance of the Halvergate Marshes Conservation Area and contributes to local distinctiveness in line with Local Plan Policy DM11 and NPPF para 197.

BA/2023/0214/FUL An integral part of the overall proposal is for a small building containing living accommodation for occasional use. I have no objection to this building in design or heritage terms. The building is physically and visually lightweight, and the scale and design of the building and the proposed materials will ensure that it is visually recessive and does not impose on the setting of the listed mill, or the wider landscape. In term of this wider impact, it is considered that it will be minimal as 'Haddiscoe Island occupies negative space – from the wider landscape the landform is concealed by the river walls, so that the eye travels over it to the furthest edges of the marsh' (Halvergate Marshes Conservation Area appraisal, page 18). To summarise, I have no objection to the proposal in terms of design and heritage and consider that the proposal will be beneficial to designated heritage assets including the grade II listed Toft Monks Mil and the Halvergate Marshes Conservation Area.

Updated response

My previous comments dated 24.07.2023 relating to application no: BA/2023/0215/LBC shall apply. The design of the new building proposed under application no: BA/2023/0214/FUL has changed slightly. The semi-circular form of the building mirrors the mill and its concave front elevation responds to the circular form of the mill, creating a positive relationship between the two. However, the contemporary design of the building ensures that it does not visually compete with the mill. The use of timber cladding and sedum, as well as the curved roof form facing the wider landscape result in a building that should appear lightweight and visually recessive despite the slight increase in height and footprint. I would suggest that materials are conditioned and that timber framed windows and doors would be most appropriate in this location and ensure that the building relates to its landscape and historic context. To summarise, I am supportive of this proposal which would result in the repair and restoration of a grade II listed drainage mill. It is also considered that the ongoing maintenance and upkeep of the mill is more likely with the

regular visitors that the accommodation should provide and that this accommodation has been designed in such a way to be sensitive to both the setting of the designated heritage assets and the wider landscape.