

Planning Committee

5 December 2025

Agenda item number 7.1

BA/2025/0238/FUL Land To West Of Clint Street, Ludham, Norfolk

Report by Planning Officer

Proposal

Installation of a 4 metre wind pump at northeast corner of site to lift water from IDB drain to facilitate rewetting.

Applicant

Broads Authority

Recommendation

Approve, subject to conditions

Reason for referral to committee

The applicant is the Broads Authority

Application target date

5 November 2025

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1. Description of site and proposals

- 1.1. The site is located to the west of the village of Ludham, on the southern side of the River Ant. The site is within an area of marshes measuring approximately 25.6Ha and forms part of the Buttles Marsh Norfolk County Wildlife Site.
- 1.2. To the north of the site lies the environmentally designated area of How Hill Nature Reserve, which is a Broadland Special Protection Zone, a Broadland RAMSAR, part of The Broads Special Area of Conservation and the Ant Broads and Marshes SSSI.
- 1.3. The proposed location of the wind pump is in the northern part of the Buttle Marsh site in closer proximity to the grade II* listed Turf Fen Mill and How Hill House which is grade II listed.
- 1.4. To the north, east and south of the site are public footpaths Ludham FP11, Ludham FP12 and Ludham FP10 respectively. Ruther to the northwest is Barton Turf FP9.
- 1.5. The aims of the proposals are for the relocation of a single wind pump which originally gained planning permission as part of application reference BA/2023/0320/FUL, approved in November 2023. The proposal serves the same fundamental purpose, which is to facilitate the rewetting of Buttle Marsh and restore suitable peat building conditions.
- 1.6. The proposed works include the installation of a 4 metre high windpump at the north-west corner of Buttle Marsh to lift water from the adjacent IDB drain, to supply additional water to the site to achieve peat forming conditions.

- 1.7. The windpump is a Bosman windpump, and consists of a precast concrete base, and a metal tower to which the sales are attached. The precast concrete base contains the pump, which is a small Archimedes screw. This Wind Pump has been used in other developments in the Broads, including at the Calthorpe Broad Nature Reserve.
- 1.8. The base will be set into the toe of the bund, directly facing the water. An eel screen will be installed between the IDB drain and the pump, in line with the Environment Agency conditions for the abstraction licence. The top of the concrete base will be no higher than the existing bund that keeps water in buttle marsh. Pipes will be installed through the bund, to feed water into the drainage channels opposite the installation site.
- 1.9. The aim is for water to flow along this channel to the catch dyke, which runs along the toe of the adjacent hill, and disperse across the site along the old drainage channels. This will allow the water to spread evenly across the site, whilst minimising losses through the bund around the outer edge of the site.

2. Site history

- 2.1. BA/2003/1514/HISTAP. Engineering operations to create wet reed-bed habitat. Withdrawn.
- 2.2. BA/2003/1492/HISTAP. Engineering operations to create wet reed-bed habitat. Approved.
- 2.3. BA/2004/1363/HISTAP. Flood defence improvement works comprising set back and strengthening of floodbank, soke dyke excavation, temporary site compound and access. Approved.
- 2.4. BA/2014/0347/FUL. To extend the existing Scrape by excavating some of the lower areas along two edges of the Compartment which would be a mixture of peat and clay, to be used to renovate the existing track access to the site, giving essential access for vehicles and personnel, to carry out the various land management operations. Approved.
- 2.5. BA/2023/0320/FUL. Engineering works to re-wet Buttle Marsh and restore sustainable peat building conditions. Approved.

3. Consultations received

Parish Council

- 3.1. The Parish Council support this application.

To minimise light pollution, the Parish Council recommends that any outdoor lights associated with this proposed development should be:

1. fully shielded (enclosed in full glass cut-off fitments)
2. directed downwards (mounted horizontally to the ground and not tilted upwards)

3. switched on only when needed (no dusk to dawn lamps)
4. white light low energy lamps (Philips Cosmopolis or fluorescent) and not orange or pink sodium sources)

- 3.2. In order to encourage biodiversity, the Parish Council encourages a suitable planting plan to support biodiversity. In order to encourage biodiversity, the Parish Council encourages all applicants to consider sustainability, environmental impact and biodiversity when making decisions.

Environment Agency

- 3.3. No objection. The EA have reviewed the submitted Flood Risk Assessment (FRA), dated July 2023 and referenced 332511296, which has been updated from the previous submission under BA2023/0320/FUL. The current application proposes a new location for the wind pump and the revised FRA includes updated modelled data, in line with the guidance.
- 3.4. The EA are satisfied that the proposed windpump will not impact on their flood defence assets at this location, nor affect their required access for maintenance.
- 3.5. The applicant/person(s) responsible for the development should be aware that The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for several activities within 8 metres of the bank of a main river or 16 metres if it is a tidal main river. The full details of these activities are available to view online in the EA's full response. It is the responsibility of the applicant and/or person(s) responsible for the development to consult with the EA at the earliest opportunity in respect of Environmental Permits.

Natural England

- 3.6. Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes. No objection.

Broads Internal Drainage Board

- 3.7. The Board's Officers have reviewed the documents submitted in support of the above planning application. Land Drainage Consent is required to enable the proposals at this site, however the applicant has applied to the Board and been granted the necessary consent.

Biodiversity Net Gain Consultant

- 3.8. The project is needed to wet land for the success of a significant habitat restoration project. Work will involve the installation of a Bosman B4 wind water mill and formation of c. 20m of new ditch through existing reedbed. The concrete sheet piles and the base of the mill cover an area of <math><4\text{m}^2</math>.
- 3.9. Apart from a few exceptions, all planning applications are subject to the pre-commencement Biodiversity Gain planning condition. For low impact projects the "De

minimis” conditions can be applied to determine whether the proposal will be exempt from mandatory 10% gain (HMSO, 2024).

- 3.10. The first condition is that the development does not impact an onsite priority habitat. The second condition is that the development impacts; a) less than 25m² of onsite habitat that has biodiversity value greater than zero; and b) less than 5m in length of onsite linear habitat.
- 3.11. The majority of the proposed development will be confined to an area which is currently modified grassland with an approximate area of <4m². This is the only impact to habitats that have a relative value that is greater than zero.
- 3.12. With reference to The Biodiversity Gain Requirements (Exemptions) Regulations 2024, the applicant has supplied sufficient information to demonstrate that this development falls below the “De minimis” 25m² threshold and is therefore considered to be exempt from the mandatory 10% Biodiversity Net Gain Requirement.

BA Ecology

- 3.13. The site lies approximately 190m south of the Ant Broads and Marshes SSSI. The small scale of the works and short time scale is unlikely to have any significant effect on the designated site. The installation of a wind pump is planned from mid-February to mid-April, taking 2 days to erect with small scale water vole mitigation prior to the works.
- 3.14. MHE Consulting Summary Survey Report for Water Voles, states an A11 water vole licence application to Natural England for the scheme will be required. This is to be conditioned and implemented during the mitigation period for water voles, either between 15 February to 15 April or from 15 September to 31 October.
- 3.15. The bank provides potential refugia such as a hibernaculum, grass snakes are known to be active on the site. Displacement cutting is to take place outside of the hibernating season for reptiles (March-September).
- 3.16. During the works if any evidence of nesting birds is seen within the vicinity, works are to stop immediately, and advice sought from a suitably qualified independent Ecologist. All wild bird species, their eggs and nests are protected by law under the Wildlife & Countryside Act 1981.
- 3.17. Environmental Conditions - The Biosecurity protocol ‘Check, Clean, Dry’ should be observed at all times during the development.
- 3.18. A pollution prevention plan should be submitted to the LPA identifying potential pollution risks (e.g. chemical spillages, refuelling operations), how these risks will be minimized and how any emergency incidents will be dealt with and reported.
- 3.19. Biodiversity enhancements - One - A frame barn owl box to be positioned on a mature tree facing between North – East, with the base of the box 3 metres from ground level. A clear flight path to the box should be maintained. The box should be maintained in perpetuity.

- 3.20. No objection to the application if the applicant adheres to an A11 water vole licence, mitigation and enhancements forementioned.

BA Landscape

- 3.21. No objection. The information submitted together with additional details provided by the applicant has been reviewed and considered proportionate and appropriate to demonstrate the potential impacts on the landscape character of the site and the surrounding area.
- 3.22. The information demonstrates that while the wind pump may be visible in some locations including Ludham FP11 and Barton Turf FP9, it is likely the structure will be viewed as a minor component of the overall view.
- 3.23. Given the limited height of the structure and the additional measures suggested for mitigation including painting the pump to reflect traditional mill treatments, these measures will help to reduce the likely impact of the structure on views within the wider landscape, and where visible the wind pump will be viewed as a modern interpretation of traditional drainage structures seen throughout the Broads landscape.
- 3.24. While there have been no public comments made on the application and other responses have been supportive, the landscape consultant has suggested discrete public information boards explaining the structure and its purpose in relation to the scheme to re-wet the marsh would be beneficial in increasing public awareness of the relationship of these structures (both historic and contemporary) and the valued landscape of the broads.

BA Historic Environment Manager

- 3.25. The wind pump is in the northern part of the Buttles Marsh site in closer proximity to the grade II* listed Turf Fen Mill and How Hill House which is grade II listed. The impact on the setting of these designated heritage assets and how that may affect their significance therefore needs to be considered as set out in the NPPF and Local Plan policy DM11a.
- 3.26. The landscape setting is integral to the significance of both of these heritage assets. Turf Fen was built as a utilitarian structure to drain the marshes in which it sits, a predecessor to the structure now being proposed. The immediate setting of the mill will not be altered by the proposal and any impact on its wider setting should not erode this significance.
- 3.27. How Hill House was built by the wealthy Boardman family to address the landscape and take advantage of the views from the hill on which it sits. As part of the reason for its location and design was this relationship with the wider landscape the potential for changes to the wider setting to impact on this significance is greater.
- 3.28. The proposed windpump is to be no more than 6m in height (including the sails) and its location is at lower marsh level to the east of the flood bank, which is at a higher level

and along which the footpath runs. To the east of the site, a bank of trees on slightly higher ground provides a backdrop to the pump when viewed from certain directions.

- 3.29. In the tradition of Broads wind turbines, the pump is proposed to be painted black which white sails.
- 3.30. Taking account of the mitigation measures, the visual impact of the wind pump will be limited and when viewed from How Hill House, given the much greater scale and closer proximity of Turf Fen Mill, this heritage asset will continue to dominate the landscape.
- 3.31. If glimpsed views in either direction between the heritage assets and the new wind pump are present, the scale, design and position of the proposed windpump is such that it will not erode the significance of the designated heritage assets and could be said to continue the long tradition of water management in the Broads.

4. Representations

Broads Society

- 4.1. The Broads Society Fully supports this application aimed at rewetting Buttle Marsh and has no objection to the form of the proposed windpump.

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:
 - DM5 – Development and Flood Risk
 - DM11 – Heritage Assets
 - DM13 – Impact on Ecology
 - DM16 – Development and Landscape
 - DM43 – Design

6. Assessment

- 6.1. Following planning permission granted for engineering works to re-wet Buttle Marsh and restore sustainable peat building conditions including installation of a wind pump under application reference BA/2023/0320/FUL, the current application is simply seeking to re-locate the already approved wind pump to the northwest corner of Buttle Marsh without making any changes to the approved scheme in any other aspect. The main considerations in the determination of the application are the principle of the development, the impact on landscape, ecology and biodiversity, heritage assets and flood risk.

Principle of development

- 6.2. In terms of the principle of development, there are no specific policies within the Local Plan for the Broads which relate to this type of development. However, it is recognised that the marshes are nationally and internationally important wetland habitats for many species and large areas are designated as a result. It is also recognised that peat is hugely important to the environment – acting as a carbon store, wildlife habitat and as a means of flood control.
- 6.3. With this in mind and given the previously approved scheme under application reference BA/2023/0320/FUL, Strategic Policy SP6 is relevant as this requires that development protects the value and integrity of nature conservation interest and objectives of national and local nature conservation designations and should demonstrate biodiversity gains wherever possible. The principle of the development is therefore considered acceptable.

Impact upon the landscape

- 6.4. The information provided has been reviewed and considered proportionate and appropriate to assess the potential landscape and visual impacts of the proposed new location of the wind pump.
- 6.5. Overall, while the wind pump may be visible in some locations including several of the public foot paths in close proximity to the site, it is likely that the structure will be viewed as a minor component of the overall view given its restricted height and external finishes, which are seeking to reflect traditional mill treatments and provide a modern interpretation of traditional drainage structures that are seen throughout the Broads landscape.
- 6.6. Based on the information provided together with the landscape assessment the proposal is considered acceptable and complies with Policy DM16 of the Local Plan for the Broads 2019.

Impact on ecology

- 6.7. The site lies approximately 190m south of the Ant Broads and Marshes SSSI. The small scale of the works and short time scale is unlikely to have any significant effect on the designated site subject to the Biosecurity protocol 'Check, Clean, Dry' being observed at all times during the development.
- 6.8. In addition, prior to the installation of the wind pump a Pollution Prevention Plan will need to be submitted and approved in writing by the Local Planning Authority to ensure potential pollution risks (eg. chemical spillages and refuelling operations) are identified and how they will be minimized as well as how emergency incidents will be dealt with and reported. This will be conditioned accordingly.
- 6.9. Biodiversity enhancements will also be necessary, these have been identified as one A-frame barn owl box to be positioned on a mature tree facing between North – East,

with the base of the box three metres from ground level and a clear flight path to the box to be maintained in perpetuity.

- 6.10. Based on the above assessment and subject to the required conditions and biosecurity protocols being adhered to, the proposal complies with Policy DM13 of the Local Plan for the Broads 2019.

Design – impact on heritage assets

- 6.11. The wind pump is proposed in the northern part of the Buttles Marsh site in closer proximity to the grade II* listed Turf Fen Mill and How Hill House which is grade II listed. The impact on the setting of these designated heritage assets and how that may affect their significance has been considered. In addition, the landscape setting is also integral to the significance of both heritage assets.
- 6.12. The proposed windpump is to be no more than 6m in height (including the sails) and in the tradition of Broads wind turbines, the pump is proposed to be painted black with white sales.
- 6.13. Its location is at lower marsh level to the east of the flood bank, which is at a higher level and along which the footpath runs. To the east of the site, a bank of trees on slightly higher ground provides a backdrop to the pump when viewed from certain directions.
- 6.14. Given the above mitigation measures, the visual impact of the wind pump will be limited and when viewed from How Hill House, since Turf Fen Mill is much greater in scale and proximity, this heritage asset will continue to dominate the landscape.
- 6.15. Should glimpsed views in either direction be apparent between the heritage assets and the new wind pump, the scale, design and position of the proposed wind pump is such that it will not erode the significance of the designated heritage assets and therefore complies with Policy DM11 and DM43 of the Local Plan for the Broads 2019 and the overarching requirements of the NPPF.
- 6.16. Additionally, the proposal will enable the continued long tradition of water management in the Broads.

Flood Risk

- 6.17. The EA have reviewed the submitted Flood Risk Assessment (FRA) which has been updated to take account of the current application and new location for the wind pump. The revised FRA includes updated modelled data, in line with relevant guidance.
- 6.18. The EA are satisfied that the proposed windpump will not impact on their flood defence assets at this location, nor affect their required access for maintenance and therefore have no objection to the scheme. The proposed development therefore accords with Policy DM5 of the Local Plan for the Broads 2019.

Other issues

- 6.19. Outstanding discharge of Conditions 3 and 4 of the original planning permission reference BA/2023/0320/FUL are currently being considered by the Broads Authority Planning Department. As part of this application the applicant has confirmed that the wind pump previously granted permission will not be installed and that no details will be provided in respect of Condition 3, point a) of planning permission BA/2023/0320/FUL as the wind pump will be installed under the permission now sought.

7. Conclusion

- 7.1. Based on the information submitted to support this application for the proposed works, the principle of development is in accordance with all relevant planning policy, in particular DM5, DM11, DM13, DM16 & DM43. The proposal follows a previous approval to improve existing land use by creating new wetland features capable of supporting greater biodiversity and offering adaption to climate change along with continuing to provide freshwater for local farming. The design of the proposals is considered to be acceptable and it is not considered that the proposal will result in an adverse impact on, biodiversity, flood risk or have an unacceptable adverse impact on either heritage assets or landscape character. Therefore, it is recommended that planning permission is approved subject to conditions.

8. Recommendation

- 8.1. Approve subject to the following conditions:
- Time Limit
 - In accordance with plans
 - Details of Pollution Prevention Plan
 - Biodiversity Mitigation and A11 licence for water vole
 - Observe biosecurity protocol 'Check, Clean, Dry'
 - Displacement cutting outside of the hibernating season for reptiles
 - If evidence of nesting birds found works to stop immediately
 - One - A frame barn owl box.

9. Reason for recommendation

- 9.1. It is considered that the principle of development is in accordance with all relevant planning policy, in particular DM5, DM11, DM13, DM16 & DM43 of the Local Plan for the Broads.

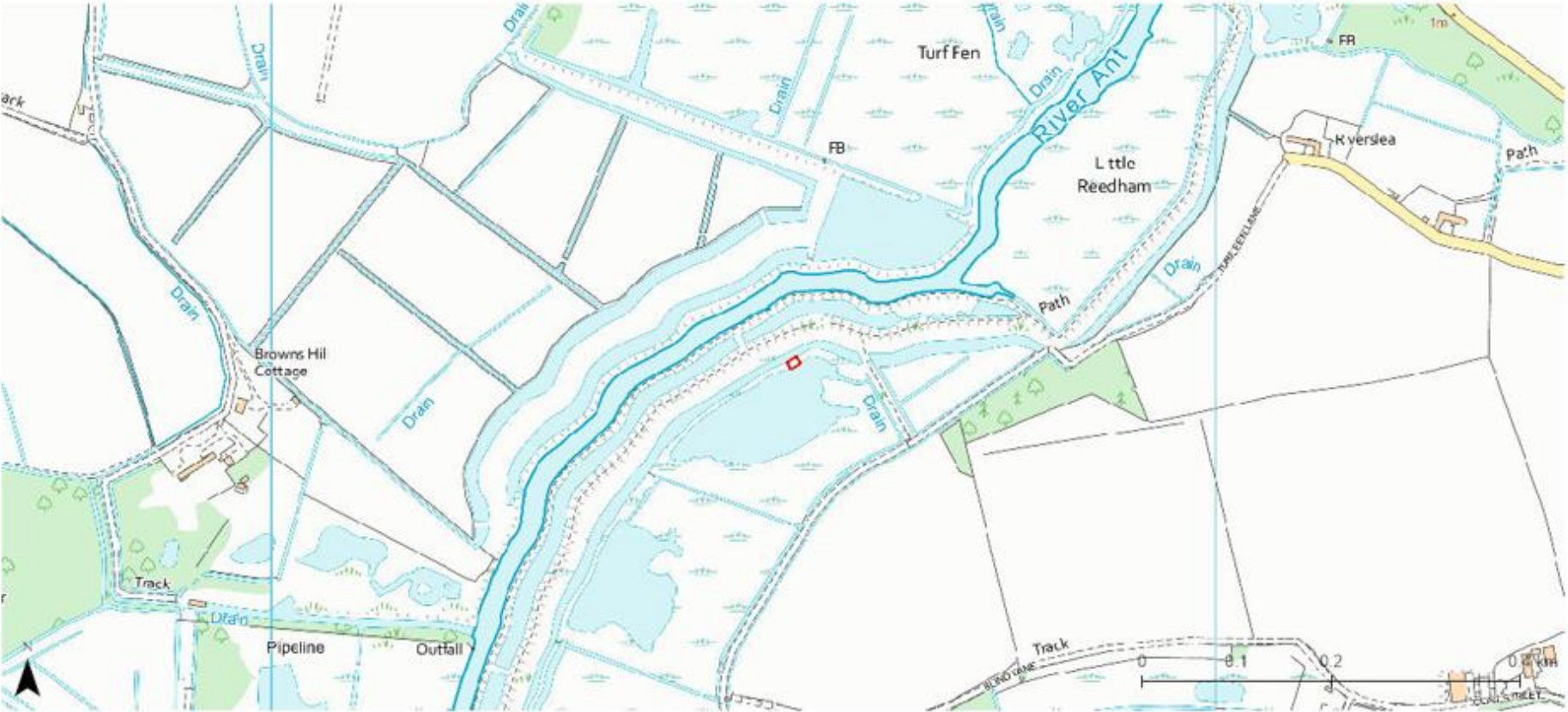
Author: Jane Fox

Date of report: 18 November 2025

Appendix 1 – [Location map](#)

Appendix 1 – Location map

BA/2025/0238/FUL - Land To West Of, Clint Street, Ludham, Norfolk



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