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NCC Ref: FUL/2023/0005

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Proposal: Creation of a new recycling centre (RC) to deal with household waste and small amounts of trade waste. RC includes creation of a concrete pad and erection of new staff welfare office and reuse shop (with photovoltaic panels) for onsite sale of items suitable for reuse and ancillary small-scale sale of non-recycled items (Christmas trees, logs, compost bins and green waste sacks). Creation of a new access onto the A148 Holt Road with the closure of the eastern end of the existing Holt Road and reinstatement to highway verge (FUL/2023/0005)

Location: Land Off Lay-by, Holt Road (A148), East Beckham, Norwich, Norfolk, NR11 8RP

I refer to your consultation for the above proposal, received by the North Norfolk District Council on.

North Norfolk District Council has assessed the proposal and can provide the following comments:

Landscape Officer response

The Landscape section wish to raise serious concerns with regard to the potential adverse landscape and visual impact resulting from this proposal within the designated landscape of the Norfolk Coast AONB and consider that this has been significantly understated within the submitted information.

Development

The site currently forms part of an agricultural field which, together with adjacent fields either side, forms an arable setting to established woodland to the north and west. The former Holt Road extends along the south boundary and provides access to the existing recycling centre located south-west of the site set amongst woodland.

The proposal is for a change of use of land from part of an agricultural field to a large (0.34ha.) recycling centre comprising concrete pad, a large amount of vehicle hardstanding and access, a staff welfare building (3.3m height) a reuse shop (3.7m plus solar panels), numerous containers up to 2.65 m in height), CCTV, boundary fencing comprising 2.5m chain link with cranked barb wire on top and a 2.5m willow acoustic barrier on the north boundary and drainage swales. Soft landscape proposals include gapping up some newly planted hedging, a length of new hedgerow and groups of small species of tree. The submission contains no

information with regard to security lighting which has the potential for significant landscape and visual impact.

AONB

The site lies within the Norfolk Coast Area of Outstanding Natural Beauty, a national designation recognising the natural beauty of a landscape. Para 176 of the NPPF requires that 'great weight' is given within planning decisions to the conservation and enhancement of the landscape and scenic beauty of this protected landscape.

The Norfolk Coast AONB is designated for its complex and varied geomorphology and resulting diverse landscapes, both coastal and inland. The site is located in a southern part of the AONB, amongst the elevated wooded landscape of Cromer Ridge, a prominent glacial landform that influences the landscape surrounding it, to the north with steep slopes leading down to the sea, and transitions into arable farmland on the gentler southern side of the ridge. In the site area the AONB boundary extends south to encompass the arable farmland around East Beckham. The AONB Integrated Landscape Character Guidance classifies the area as Wooded with Parkland (Holt to Cromer WP2), noting the wide mix of woodland interspersed with pockets of arable land that forms a cohesive area. Key features that form the inherent sensitivity of this Type include *'the specific combinations of woodland, open farmland and heath which form the distinctive landscape setting to Sheringham and Holt'*. The area immediately around the site demonstrates exactly this, with arable land contrasting with the wooded backdrop of the 20th century plotland development of Sheringwood. Guidelines for conservation and enhancement of this distinct landscape Type include *'conservation of the character and landscape setting of the distinctive 'plotlands' settlement (High Kelling, Aylmerton and Sheringham) on the Cromer Ridge, which are unique to Norfolk and of some historic significance'*. The siting of a recycling centre with large structures, security fencing and lighting in the middle of arable fields that form the setting to Sheringwood will not conserve the landscape setting of this noted landscape feature. Increased external lighting as a result of development is noted within the Guidance as a potentially detracting feature that could harm the landscape character.

Similarly the North Norfolk Landscape Character Assessment (2021 SPD) classifies the landscape around the site as Wooded Glacial Ridge, noting the Key Characteristics of the distinctive and prominent landform and land cover and the unusual plotland developments at High Kelling and Sheringwood. Valued Features of this Type which, if adversely affected, would detrimentally change the character of the defined landscape (para 2.13) include *'a strong sense of remoteness and tranquillity and dark night skies'*, as a result of the comparative lack of settlement and extensive woodland.

Dark night skies are a stated feature of one of the defined special qualities of the Norfolk Coast AONB, namely **'A Sense of Remoteness, Tranquillity and Wildness.'** There is no other visible development in the vicinity of the site which sits in an open location amongst agricultural land. The introduction of an industrial development of this nature in the proposed open location with tall structures, security fencing and security lighting on tall columns would have a significant adverse effect on this defined special quality. It would not reinforce the prevailing landscape characteristics as set out above and would therefore also incur harm to the key quality of **'Diversity and Integrity of Landscape, Seascape and Settlement Character'**. The site is directly adjacent to the mature woodland of Sheringwood, within which residential and commercial development has been discreetly accommodated without incurring landscape and visual harm to the undeveloped wooded character of the Cromer Ridge. The existing recycling facility is well accommodated within woodland and incurs minimal, if any, landscape and visual impact. It should also be acknowledged that within 1km of the site are two quarries which are barely discernible from the main A148 road, due to their carefully selected locations.

This proposed development is located on open arable land, in a prominent location readily visible from the main road which is a busy tourist route.

Lighting

External lighting is not mentioned in the submitted information, or any details provided, but given that CCTV is proposed, it is presumed there will be a requirement for lighting. This could be one of the most significant elements of the whole development, given the highly sensitive landscape context and the valued dark night skies which are a stated feature of the special quality of the AONB. The effects of this element could be more significant than the day time impacts. The site lies within Environmental Zone E1, as defined by the Institute of Lighting Professionals, Guidance Note GN01/21 The Reduction of Obtrusive Light which sets out parameters for acceptable light levels to limit light pollution, such as minimal light intensity and zero upward sky glow.

The Landscape and Visual Appraisal makes no assessment of the impacts of the development on nocturnal character and this is a fundamental omission.

Landscape and Visual Appraisal

The submitted Landscape and Visual Appraisal (Lanpro, Jan 2023) (LVA) underestimates the sensitivity of the site and the receptors. The LVA concludes a Moderate Adverse Effect on the landscape at Year 1, reducing to Moderate-Minor Adverse at Year 15. The LVA underestimates the significant change to the baseline resource from agricultural field to hard built development which is not at all moderated by any other surrounding development.

6.2 Landscape sensitivity at the immediate context of the Site is considered to be High due its location within the AONB. Landscape sensitivity at Site level is considered to be Medium, since despite its location within the AONB there are no defining features present that contribute to the distinctive character of the designation.

7.2.3 Susceptibility to the Development is therefore considered to be low , as the relevant characteristics of the landscape are generally able to accommodate the Development with little or no undue consequences on the existing character and quality of the landscape of the Site.

As acknowledged in the LVA and set out above, it is the very interplay of the woodland of the glacial ridge with the arable farmland that is one of the inherent sensitivities of this part of the AONB. The open arable landscape around the site has little or no capacity to assimilate an industrial development of this scale with high fencing, vehicle provision, large containers and security lighting without significantly harming this key characteristic.

There is an over-reliance on existing and surrounding landscape features and the planting proposals to mitigate any adverse effects of the development

7.2.7 Despite the Site being part of a rural landscape in which arable land use predominates, its ability to be comfortably assimilated into this setting is attributed to the retention and enhancement of its boundaries and enhancement with new planting mitigation. The Site is also set in close proximity to the busy road network of the A148 that is not far from road noise and the visual intrusion of passing vehicles and so the presence of a recycling facility would not be discordant in this context.

Existing landscape features of the site include a newly planted hawthorn hedge on the east boundary. 10 semi-mature field maple trees form the south boundary and are to be removed along with a section of the mature woodland to the south to facilitate the new access

road. Mature woodland to the west and south of the site provides screening from these directions, but there is little effective intervening vegetation approaching the site from the east from Britons Lane and the A148, and from this direction the site will be very prominent.

The proposed mitigation is nowhere near of sufficient proportion to provide effective mitigation of a development of this scale in the open arable setting. Crab apple, hazel and dogwood trees and shrubs are small species more suitable for a domestic garden species than for this type or scale of development, nor are they reflective of the surrounding mature woodland. Belts of mixed native woodland with oak, pine, field maple, sycamore and wild cherry would be of a scale more proportionate to the impacts of this development and reflect the surrounding woodland mix. Supplementing a newly planted hawthorn hedge on the east boundary and adding groups of small trees will not adequately mitigate the impacts of 2.5m high security fencing, large containers and tall lighting columns. There is insufficient space given over for the quantity of planting that would be required to provide proportionate mitigation in such an open setting. Any available space within the red line is limited by the swale drainage features.

The wooded backdrop of Sheringwood and other surrounding woodland making up the Wooded Glacial Ridge would limit long range views of the site, and the main effects would be experienced within closer range of the site, as demonstrated at VP3 Britons Lane junction with the A148 and VP2 Britons Lane footpath Beeston Regis BR10P and to the south from VP4 Footpath East Beckham FP4. These effects would be significantly adverse and not effectively moderated by intervening vegetation or the presence of the A148 as is claimed in the assessment from VP4.

In relation to visual effects, road users on the A148 are assessed in VP3 as having a Low Susceptibility to Change as they would be travelling at speed. This is a main tourist route to the coast and a Medium Susceptibility would be more accurate. There is very little development either side of the A148 in this area between Aylmerton and Bodham. Arable fields and woodland are the prominent landscape features. The proposed development would be significantly incongruous in this rural context and, compounded with the increased activity of readily visible vehicle movements around the site, would be a distracting feature for road users. The A148 descends from the east towards the site, so the views of the site would be apparent for a considerable length of the road, not just in the immediate vicinity of the site. There is over-reliance on the landscape mitigation to reduce the Moderate level of effect at Year1 to Minor Negligible at Year 15. This will remain a jarring development in a rural context.

The lack of any assessment within the LVA of potential impacts of the development on the nocturnal character of the AONB and landscape character is a serious omission. It is not therefore possible to gain a complete analysis of the impact of the proposed development.

Conclusion

The scale and nature of this proposal will cause harm to the defined special qualities of the AONB and the development will not conserve or enhance the landscape and scenic beauty of the designated landscape, as required by para 176 of the NPPF. The landscape mitigation put forward is not proportionate to the identified harm which has been considerably under-assessed.

It is extremely disappointing that there appears to have been no pre-app engagement with North Norfolk District Council, the relevant planning authority within whose jurisdiction the site lies. Advice could have been given with regard to site selection and alternatives that have been considered. It is most unfortunate that remodelling of the existing site on grounds of constraints of access ease of use for the public appears to have been fairly readily dismissed. This is an extremely discreet site successfully accommodated within the

designated landscape, in stark contrast to the development now proposed. Extension of this site within its enclosed wooded setting would address concerns raised with regard to the impact on the designated AONB landscape.

Ecology Officer response

The Landscape section has reviewed the Preliminary Ecological Appraisal (PEA) and Biodiversity Net Gain (BNG) Feasibility Report submitted with the application and provides the following comments.

The Landscape section broadly agree with the assessment and recommendations made within the PEA. However, it is noted the increase in disturbance over the existing baseline (both onsite and increased traffic movements) which would occur during operation of the site do not appear to have been fully considered within the assessment of impacts. Recommendations include works to be undertaken under an Ecological Method Statement and for any lighting to be sensitively designed with regard to foraging bats. The Landscape section would recommend securing a Construction Ecological Management Plan (CEMP) to detail all mitigation measures required throughout the construction phase of the development and to act as a single 'go to' document for construction personnel to refer to onsite. Additionally, in the event the application is approved, the Landscape section would recommend an external lighting condition is secured requiring details of any external lighting to be installed to be submitted to and approved by the Council prior to installation.

The BNG Feasibility Report highlights the current scheme would result in a net loss of -24.80% habitat units at the site. Recommendations within the report are for the proposed closed section of road to be allowed to scrub over to replace scrub lost at the site which would lead to a net increase of +23.88% habitat units. A range of other biodiversity enhancements are recommended within the PEA (e.g. bat and bird boxes) which are not considered within the Biodiversity Metric, and a recommendation is also made to condition a Landscape and Ecological Management Plan (LEMP) to secure appropriate management and monitoring of habitats. The Landscape section would support a LEMP being secured by condition to ensure the proposed development delivers quantifiable BNG.

Officer Summary Section

Given the sensitive location, with the site within the Norfolk Coast Area of Outstanding Natural Beauty (AONB) the proposed development would potentially conflict with Local Policies EN 1, EN 2 that seek to ensure development proposals are sympathetic to their locations, protecting and where possible enhancing character areas and special qualities of the AONB. Additionally, where proposals would have an adverse impact to the AONB it would need to be demonstrated that such development cannot be located on alternative sites that would cause less harm and the benefits of the development clearly outweigh any adverse impacts.

Paragraph 176 of the National Planning Policy Framework (NPPF) also sets out that development within the AONB should be sensitively located and designed to avoid or minimise adverse impacts in the designated area. North Norfolk District Council Officers have concerns the proposal would harm to the character area and AONB, the existing facility is relatively well screened from the wider landscape, the new facility would not be as readily assimilated into this sensitive landscape, with insufficient screening to mitigate the impact as shown on the current scheme, and insufficient scope of the Landscape and Visual Appraisal. Regarding ecology, there are no significant concerns raised but the council's ecologist recommends

conditions be considered should the application be approved. Please take these comments into account when determining the application, and comments from our landscape and ecology officers (environmental health team are sending comments direct);

Date: 16th March 2023

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