



The countryside charity
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Working locally and nationally to
promote, protect and enhance a
beautiful and thriving countryside
for everyone's benefit.

Submitted via NCC planning portal on 21 March 2023

FUL/2023/0005 land off Holt Road, Sheringham, NR26 8TW – creation of new recycling centre (RC) to deal with household waste and small amounts of trade waste....

Dear Madam/Sir,

CPRE Norfolk objects to this application, primarily due to the site being located within the Norfolk Coast AONB. This is disappointing as in general CPRE Norfolk supports the need for recycling waste. However, the location of recycling centres as with other major development, needs to take account of nationally important landscape designations such as in this case the Norfolk Coast AONB.

We feel that the location of the site within the Norfolk Coast AONB is not fully or satisfactorily addressed in the application documentation, notably the Planning Statement (landscape section, paras. 6.29 – 6.31.) The key NPPF paragraphs are 176 and 177. NPPF para. 176 requires that “great weight should be given to conserving and enhancing the landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty”. The application documents give no indication of how the affected parts of the AONB will be conserved or enhanced by the proposed works. Para. 177 goes on to explain: “when considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.” As the application is in part for “waste development” facilities (operational development which is designed to be used wholly or mainly for the purpose of, or material change of use to, treating, storing, processing or disposing of refuse or waste materials,) it is considered to be a “major development”. The application documentation makes no attempt to explain what these “exceptional circumstances” might be, and therefore we suggest that this application cannot be approved. Moreover, there is no clear detailed assessment of the three elements outlined in the remainder of NPPF para. 177, providing further reason why the planning authority should not grant permission, as it is unable to judge the application against these requirements.

We are concerned that the site selection criteria do not make any reference to the need to take landscape (or other) designations into consideration. This oversight means that the importance and special qualities of the AONB have not been part of the site selection process.

The inclusion of a shop in the application gives further cause for concern. This different and specific use would be particularly difficult to justify in terms of NPPF para. 177.

If, despite these objections, permission is granted, we ask that any external lighting is only activated by movement sensors, and that there is no permanent dusk to dawn lighting. Any outdoor lights should be full cut off, flat glass fitments (i.e. no glass should protrude beneath the light shield) mounted horizontally to the ground - not pointed upwards or outwards. Even a 5-degree tilt upwards increases the amount of light pollution very significantly. For this application to be considered we feel that a full lighting report needs to be submitted as part of the application.

Yours faithfully,

Michael Rayner

Planning Campaigns Consultant, CPRE Norfolk