

NNDC Ref: BX/23/0423
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 re-consultation for the above proposal, received by the North Norfolk District Council on 7th February 2024.

The amendments and details provided do not sufficiently address the comments previously provided by North Norfolk District Council on the 16th March 2023. Notwithstanding the additional comments provided below, the previous comments provided are still relevant and should be read alongside this response.

North Norfolk District Council has assessed the additional details and can provide the following comments

Landscape Officer response

The main revisions to the landscape proposals are set out in the Landscape and Visual Appraisal, Addendum 2 (Lanpro Jan 2024) as:

- Revision of Rain Garden layout for improved drainage management
- Additional planting to soften security fencing to the north and west boundaries
- New gabion retaining wall to basin at the east of the site
- Revised internal structures and plan

The amendments set out above do little to address the concerns raised in NNDC's previous response dated 16th March 2023 with regard to the landscape and visual impact of this large-scale development on the nationally designated landscape (Norfolk Coast National Landscape, formerly AONB). In particular, the visual impact approaching from the east along the A148 has not been satisfactorily addressed.

Planting

As highlighted previously, the proposed planting is inappropriate for the setting and is not proportionate to the scale of the development. This has not been amended to adequately address this. There are no evergreen species to provide any winter cover. *Malus sylvestris* (crab apple) is more suitable for a hedge or a domestic garden and *Cornus sanguinea* (dogwood) and *Corylus avellana* (hazel) are shrubs, not trees. Additional hedge planting is proposed which will do little to assist in accommodating this large development into the rural setting. The existing hawthorn hedgerow is young and provides little screening. The site is surrounded by Sheringwood, a mature native woodland backdrop to the west and north dominated by scots pine, silver birch and sycamore. The east site boundary requires much more robust planting to filter views of the large containers (up to 2.6m height), the security fencing (3m chain link and barbed wire) and the 2.4m height acoustic fencing and to assimilate this large, incongruous development into the designated open landscape setting. Sufficient planting to form a landscape buffer is required on this prominent east boundary.

The east boundary should be specified with many more trees that include evergreen species such as holm oak and Scot's pine in a landscape buffer of ideally 10m deep. The line or shape of the buffer should not be linear but varied to give a more naturalistic effect. The planting palette should also include silver birch, field maple, sycamore and alder to better accommodate the development into the wooded backdrop. These should be specified in a mix of stock sizes.

The selection of white willow along the north boundary in the pinched space between the acoustic fence and the security perimeter fence is an unsuitable species choice, both for the tight space and for the wider setting. This is a fast-growing species that will soon outgrow its confines and will require regular maintenance to contain it. It is not evergreen and will not provide mitigation in winter months. It will also spread readily and colonise the surrounding area. Ivy and climbers might be a more suitable choice. Additional tree planting of birch and Scott's pine should be provided to soften this aspect.

The Visual Photomontages do not give a realistic view of the efficacy of the planting in screening the development. The vegetation will not reach the height shown, all planting specified is deciduous, so the site will be very apparent in winter months.

New access

The new access will result in the removal of 7 semi-mature trees, 2 ash, 2 cherry, 2 field maple, 1 hawthorn. The plans illustrate the existing road stopped up and native species woodland mix planted in the former hardstanding of the existing junction. We have since received underground service plans illustrating high voltage powerline and gas services running through the area. This raises serious concerns about the deliverability of these proposals. If the services mean no tree planting can take place in close proximity to the underground services, a bund with wildflower mix and scrub planting , including gorse may be an acceptable alternative landscape provision in the junction area. The Biodiversity Metric would need to be adjusted to accommodate this change.

The hazel and crab apple tree planting along the southern boundary of the site is also broadly illustrated where the high voltage cable is situated. This raises concerns about the suitability of planting here too. If this is a constraint, we would urge the retention of the existing field maple trees to provide vegetation along the southern boundary of the site.

Any achievable planting should be set back from the highway edge to allow adequate sightlines to the east.

Former road area

The Construction Compound Location Plan shows that this is to be sited on the former road and the grassed verge area. This is to include a welfare unit and a diesel bowser. The Landscape Mitigation Plan (Lanpro Dwg No. 2735 00 201 Rev H) shows this area to be planted with a Native Species Woodland Mix. This area should be protected from diesel spillage and compaction if it is to be reinstated and protection measures included in an amended Arboricultural Method Statement.

There is no information as to how the ground will be prepared to receive this planting or whether this is feasible, given the number of service runs in this area. A more detailed specification for ground preparation is required to demonstrate that this can be achieved in this part of the site.

Existing site

There is no information with regard to reinstatement of the existing recycling site. Will the hard surface be lifted and this be reverted to woodland and factored into the biodiversity net gain calculations? How will this be achieved? Further information is required.

External lighting

It is understood that there will be minimal external lighting on the site, and that this is required for staff welfare purposes. Any lighting should be downward directional, shielded to avoid light spill, warm white and the wattage suitable for the purpose to avoid unnecessary light pollution on the valued dark night skies which are a defining feature of the Norfolk Coast National Landscape.

Conclusion

Amendments and clarifications are required prior to any consent to demonstrate more substantial and appropriate planting species that will provide more effective mitigation to make this development acceptable in this incongruous location.

As currently presented, NNDC maintains its objection to this proposal due to conflict with Local Plan policies EN1, EN2 and EN4. The proposals also fail to demonstrate that 'great weight' has been applied to the conservation and enhancement of the landscape and scenic beauty of the Norfolk Coast National Landscape (formerly AONB), as required by para 182 of the NPPF.

Officer Summary Section

The same concerns would largely remain as per the previous comments, 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 182 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.

Please take these comments (alongside the previous comments) into account when determining the application.

Date: 28th February 2024

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