

From: Alistair Lindop
Sent: 11 March 2024 12:20 PM
To: Annette Feeney
Subject: Designation of 39 New Road, Blakeney
Attachments: Proforma of Blakeney Pastures FOI.pdf

Dear Sir

I am writing further to my attendance of the hearing addressing Matter 10 last Wednesday, at which I spoke (as my wife is ill and unable to attend).

I made reference to the Amenity Green Space Study (Examination Document G13) and the lack of designation of Local Green Space within the North Norfolk proposed plan. I asserted that almost all areas previously recognised in the old plan as open areas (designated CT1) have been designated as Open Land Areas in the new plan and their consideration, as local green spaces was dismissed because they "already benefit from open land area, designation". I believe I heard NNDC Officer Mr Withington say that this was incorrect. I explain below (referencing evidence) that I was correct and that the process failed to deliver appropriate assessment of each of the areas concerned. It just designated all the old CT1 areas as new open land areas.

Appendix C, Local Space Assessment Criteria of Local Green Spaces (p194 of Amenity Green Space Study) states "it will rarely be appropriate to designate spaces..... that are subject to existing designation". This appears to have been interpreted to mean that if an area had a designation it did not qualify as a local green space - I think this is a misinterpretation of the NPPF. Furthermore, confusion surrounds exactly what these areas were being designated as. The evidence gathering form (the "Proforma" example of blank form is provided at Appendix B of Amenity Green Space Study) asks the question "Recommendation: Designation Upheld"? What designation? I did challenge this process at the Regulation 18 Stage but my challenge was dismissed.

The consequence of this is that there were, at the Regulation 18 Stage, just seven recommended Local Green Spaces in North Norfolk, and none of these were previously recognised as open spaces under the old CT1 policy (6 of the 7 spaces are ponds and one is a staithe). Could this small number of local green spaces be because North Norfolk has so few "demonstrably special" areas? No, I believe this shows the illogical and flawed manner in which open spaces were considered for designation in the new local plan, it also goes some way to explain the inclusion of our garden in an open land area designation.

We obtained (via a Freedom of Information request) the completed "Proforma" for Blakeney Pastures (which includes our garden). The "designation upheld?" question was answered "yes" in spite of the fact that all the evidence under "justification" on the form relates to Blakeney Pastures (the publicly accessible open space known as Blakeney Pastures) and none of it relates to the garden. We addressed all of these issues in our Regulation 19 submission including the completed proforma for Blakeney Pastures. I have attached the document again to this email.

The Statement of Land Supply paper, April 2016 (examination document K9, see page 13-14 paragraph 8.1) to which I referred at the Hearing, clearly recognises that in the 1980s and 1990s areas were originally designated as open areas in order to prevent development on them, thereby restricting the oversupply of housing, rather than because they offered any particular open space value. This, also, was referenced in our Regulation 19 submission. I believe this is the reason our garden was originally designated sometime in the 1990s. Since then it's just been rolled over.

The NNDC landscape officer made reference to the Blakeney Conservation Area Appraisal. This appraisal recognised a number of important views around the village, none of which were into or across our garden. Furthermore, the landscape officer seemed very keen that you should see an aerial photograph of the area as evidence of a perceived

“composite green space“. I would politely suggest that what is important here is what is experienced on the ground and the relationships of these very different areas and what they contribute.

Thank you for your attention.

Regards

Alistair Lindop

NDC Local Plan Review 2017: AMENITY GREEN SPACE

SITE ADDRESS: Pastures, Coast Road, Blakeney			SITE REFERENCE: B1		
SETTLEMENT:	BLAKENEY		Date of Audit:	11 th October 2017	
Area (m ²)			Site Owner:		
EXISTING DESIGNATIONS:	Open Land Area (CT1) YES	Education/Recreation Area (CT1)	Public Realm (EN5)	County Wildlife Site or other statutory designation:	
	Local Nature Reserve (EN9)	Historic Park/Garden (EN2 & EN8)	Conservation Area YES	TPO's	AONB YES
PLANNING HISTORY: Blakeney Hotel owns a portion of the land and applied to use a section for car parking (CL/15/0317 R and PF/15/1540 R) Land to east subject of housing proposals (15/0483 Appeal dismissed) and 15/1898 R). Site is in guardianship of The Pastures Charitable Trust.					
1. SITE INFORMATION					
a) SITE LOCATION: e.g. centre of settlement, within housing		Centre of settlement within Blakeney Conservation Area and the Norfolk Coast AONB			
b) CURRENT USE: e.g. open space/ sports / built upon?		The majority is public amenity green space traversed by footpaths and 2 access roads. A small portion in the northern sector (approx. 12%) is fenced off and is currently used as private parking for Blakeney Hotel, but this does not detract significantly from the character of the space. A section of the designated area to the south-east is private garden land, recently planted with orchard trees and a boundary hedge. Although private, this still functions as a part of the composite green space.			
c) SUMMARY SITE DESCRIPTION: e.g. open mown grass, woodland, neighbourhood park, sports field, cemetery.		For the most part open meadow with mature parkland trees, mature hedgerow and visual links to other green space.			
d) SITE BOUNDARIES: e.g. fencing, railings, hedgerow, none		Mostly mature hedgerow			
e) TOPOGRAPHY: is the site level or sloping?		Gently sloping southwards			
2. SITE CHARACTERISTICS					
a) LANDSCAPE FEATURES: (approx % of total area)	Short mown grass	70%	Scrub		
	Meadow/long grass	3%	Planted areas		
	Trees	10%	Ponds		

NNDC Local Plan Review 2017: AMENITY GREEN SPACE

	Hedges	15	Allotments	
b) BUILT FEATURES:	Buildings		Built Play Areas	
	Toilets		Sports Pitches	
	Picnic tables		Skate Park	
	Surfaced Paths	2%	Youth Shelter	
	Benches		Signage	
3. SITE ASSESSMENT				
	COMMENTS			
a) ACCESS				
Does the site have public access?	Yes			
Are there multiple access points?	Yes			
Does the site connect to adjoining spaces?	Yes, aside from the main coast road the site connects directly with the Pastures, the Village Hall site (B2) and the field off Langham Road (B3). There is a strong visual connection.			
Is the site readily accessible by local community e.g. walking distance or by car?	Given its central location within the settlement, the site is readily accessible to most of the local community. Positioned between the public car park within the village hall site, (B2) and the Blakeney Quay, there is considerable pedestrian movement through the site.			
b) VISIBILITY				
How visible is the site from the surrounding area?	The site is highly visible from the surrounding housing which frames the space. The site is also visible from adjacent green spaces to the south, B2, Village Hall and B3, Langham Road due to the gently rising topography.			
How visible is the site within the wider settlement?	The site has a strong presence being directly adjacent to the main coast road through the village. Although visual impact is diluted due to hedge boundaries, the sense of green space and a clear break in built form is very evident passing along this road.			

NNDC Local Plan Review 2017: AMENITY GREEN SPACE

Views out of site e.g. open/closed – confined?	Open views south to the adjoining open land of the village hall and playing fields give a sense of space. Long range views of the distant saltmarsh to the west from the north section of the space give important context to the site.		
c) USE			
Is the site used by the public?	Yes, regularly		
• By dog walkers	A central village location for dog walking		
• By young children			
• By teenagers			
• By the elderly			
• Accessed by all	Used frequently by all ages		
Is the site used for public events? e.g. fetes, local sports events	Please state if not known: Not known	Description:	
Is the site used regularly by local clubs?	Please state if not known: Not known	Description:	
d) MAINTENANCE	Assess the standard of maintenance of the following: i.e. neglected / maintained		
• Horticulture (regular mown grass, pruned and managed trees, hedges and shrubs)	Regular mown grass		
• Conservation/Biodiversity (Variety of habitat)			
• Buildings & use			
• Equipment e.g. play, seating	Benches		
• Waste Management (litter & dog bins)	Litter bins and dog bins are regularly maintained		

NNDC Local Plan Review 2017: AMENITY GREEN SPACE

e) CONTEXT	
Does the site/part of site contribute to the character and appearance of the settlement?	The site plays an integral role in the form and character of the settlement, providing a significant open space within the Conservation Area. Housing frames the site to the north, west and east and marks a clear edge to the historic village core. The site forms an important setting for this strong line of built form and provides a degree of separation between the historic core and the later extension of the village to the south. A plaque on the Pastures implies that the area was mentioned in the Domesday Book of 1086.
Does the site contribute to the setting of a Listed Building?	Two Grade II listed buildings are directly adjacent to the Pastures, 19 and 23 Westgate Street. The main elevations of these former cottages do not front onto the Pastures, but the proximity of these heritage assets directly adjacent to the open space is of some merit in shaping their setting.
f) FUNCTION	
Does the site provide public benefits? Does it provide elements of beauty, tranquillity, recreational value, wildlife etc	The central location of the site within the settlement and the multiple access points provides high accessibility and as a consequence has high usage. The size and nature of the space provides opportunities for informal recreation (walking, dog walking, games). It acts as a green lung within the settlement. The trees and hedgerows provide wildlife habitat and the location of the site adjoining other green space provides beneficial ecological connectivity.
Has the extent of the site changed in any way since the 2008 Proposals Map?	A section of the site in the north portion has recently been fenced off and is used for informal car parking by Blakeney Hotel (2017). However, there is no change to the grassed surface and the area still reads as part of the wider composite green space.

NNDC Local Plan Review 2017: AMENITY GREEN SPACE

RECOMMENDATION	
	Designation upheld: Yes
	Site is de-designated:
	Designation/layer name to use on Proposals Map e.g. Education/Recreation, Amenity Green Space Amenity Green Space
JUSTIFICATION	
Access/Amount of use	A regularly used, easily accessible and highly valued amenity green space centrally located within the settlement
Function (recreation, tranquillity, biodiversity)	High value for informal recreation (dog walking, seating, paths, views) Provides a sense of tranquillity and beauty by way of its naturalistic character and the scale of the space Biodiversity value is gained through the maturity of the landscape and variety (mown grass, trees and hedgerows provide habitats for wildlife) and the notable ecological connectivity with green space to the south.
Contribution to character of the settlement	Highly significant being one of the few areas of open space within the Conservation Area. Forms a defining edge and green setting to the historic village core and gives a degree of separation from the later development to the south. There is a significant visual quality to the site and also in its visual connection with the two sites to the south. Long range contextual views from the site to the coast are noteworthy.
Additional Notes	The site is the subject of a local Charitable Trust, established in 1999 to safeguard open space within the village. It is understood that Blakeney Parish Council supports the retention of the Open Land Area designation.