

Matter 5: Places & Housing Sites

NORTH NORFOLK LOCAL PLAN

PROPOSED SUBMISSION VERSION

Regulation 19 - January 2022

EXAMINATION STATEMENT

Policy W07/1 Land Adjacent Holkham Road

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Response to Examination Questions 5.9.4 Land Adjacent Holkham Road (W07/1):

I act as a resident of Wells next the Sea concerned with the proper planning of the town. I am not a neighbour of the site and have no pecuniary interest in this or other sites.

I do not oppose the principle of some development on this site but seek an appropriate site allocation and policy framework.

Responses are provided to each question as requested by the Inspector.

5.9.4 Land Adjacent Holkham Road (W07/1)

Standard Questions for each allocation:

c) Are any modifications suggested to the policy or text, or the site boundaries? If so, why, and are they justified or required for effectiveness?

The modifications sought to this policy which are set out in the Proposed Modification section below. The reasons for these modifications are set out in responses to the following questions.

d) Have the impacts and effects of development been properly taken into account?

The landscape impacts of the proposed development have not been properly taken into account.

The site is located within the Norfolk Coast Area of Outstanding Natural Beauty where national policy gives great weight to conserving and enhancing landscape and scenic beauty (Para. 182). The Housing and Economic Land Availability Assessment (HELAA) June 2017 identifies this site as having a moderate to high landscape sensitivity within the AONB.

As currently worded, the policy does not conform with Policy ENV1 of the Submission Version of the Local Plan. This gives the highest degree of protection to the designated landscape of the Norfolk Coast Area of Outstanding Natural Beauty. In accordance with this policy, development proposals should contribute positively to, and conserve and enhance, these valued landscapes and their settings through appropriate siting, scale, massing, materials, and design. Proposals located in a protected landscape must demonstrate how they respect the scenic quality and maintain an area's distinctive sense of place. They should reinforce local distinctiveness and local landscape character as defined by the North Norfolk Landscape Character Assessment SPD 2021, having particular reference to the defined key characteristics and valued features.

The North Norfolk Landscape Character Assessment SPD, 2021 identifies this site as being located within the Rolling Open Farmland Character Area. One of the key characteristics of this Character Area is its open, homogeneous character with expansive views. Typically low-cut hedgerows, high level topography, a lack of woodland, large field sizes and sloping plateau terrain combine to form a very open landscape. The undeveloped coastal surrounds of the town, and its contained setting to the south, are important to its character and appeal. As currently worded, Policy W07/1 would not reinforce this local distinctiveness and local landscape character.

The Sustainability Appraisal evaluates this Policy (with the criteria as currently worded) as having a negative impact on the landscape objective SA8 (To protect, manage and where possible enhance the special qualities of the areas' landscapes, townscapes and seascapes (designated and non-designated) and their settings, maintaining and strengthening local distinctiveness and sense of place). This alone confirms that the current policy is not consistent with national policy to conserve and enhance landscape and scenic beauty in Areas of Outstanding Natural Beauty, nor Policy ENV1 in reinforcing defined key characteristics and valued features.

The Submission Local Plan accepts that *'the site is reasonably prominent in the local landscape, particularly when viewed from the lower ground to the south. The site can also be seen from the Beach Road causeway'* (Para. 17.2.1).

The policy criteria as currently worded are not consistent with national or emerging local policy and would not achieve appropriate landscape mitigation in this sensitive location.

First, criterion 1 seeks to *'minimise the visual impact of the development on the Norfolk Coast AONB and long distance wider landscape views'*. This appears to diminish and undermine Policy ENV1 which states that proposals should contribute positively and conserve and enhance the Norfolk Coast Area of Outstanding Natural Beauty, consistent with the NPPF.

Second, text supporting Policy W/07/1 states: *'The site is bounded by some mature trees and hedgerows and these should be retained and extended with a strategic landscape buffer to the north of the housing site.'* (Para.17.2.2). Nevertheless, this is not explicitly carried forward with sufficient precision into the Policy which excludes reference to the necessary strategic landscape buffers to the north and east of the site.

Third, the landscape strategy appears to be to surround the development with a landscape screen. However, this fails to acknowledge one of the key landscape characteristics of Wells, noted in the Landscape Character Area Assessment SPD, 2021 which states: *'Mature tree cover within the urban area is also an important component in settlement character.'* The National Model Design Code Biodiversity Design Principles states the benefits of street trees and other landscape features in providing habitat, shading, cooling, air quality improvements and carbon sequestration, as well as being a vital component of attractive places. It is the government's intention that all new streets include sufficient space for mature native trees, (National Model Design Code Part 2 Guidance Para. 89).

Policy W07/1 currently includes an inappropriate and insufficient response to the sensitive and prominent site within the Norfolk Coast AONB which is located on higher ground and is visible in the wide landscapes of this area, including from the Beach Road causeway. Amendments are necessary to ensure this policy is consistent with national and emerging local policy.

e) Are the components of the proposal (number of dwellings, units of elderly care accommodation, amount of public open space etc) in the first sentence of the policy for the site justified?

Following my representations to the Regulation 18 Local Plan, minor modification PMIN/17.2/04 now allocates land for vehicular access to the site. This road bisects a field with an unimaginative straight alignment. The field is enclosed by a new cluster of development to the east, the Mill Farm complex to the north and a former railway line to the west. The road, bell mouth entrance and visibility splays will add an urban influence into the field. As a result of surrounding development and existing enclosure, development of the 'access field' itself for housing would have less adverse impact on the AONB than the site currently proposed.

In accordance with the NPPF, planning policies should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment (Para. 123). It is assumed that the 'access field' is available to provide the new access to this allocation. The field should therefore be allocated for housing development. This would also give the opportunity for a more imaginatively aligned landscaped access from Mill Lane.

Importantly, this would allow for a consequent reduction in the quantum of development of the currently allocated site.

f) What form would the public open space take?

The open space allocation could be reorientated into an east-west alignment along the northern boundary of the site to provide a well defined soft edge to development at this high point in this sensitive landscape.

g) Having regard to these components, is the estimate of site capacity justified?

A consequence of the factors set out in the response to Question d) the proposed capacity of the existing site allocation of approximately 50 dwellings (at a suburban net density of 25dph) is inappropriate. It is simply not appropriate to tack on a further suburban estate to Wells in this sensitive location. The strategic landscape buffer to the north and east as proposed in the reasoned justification and the need to enable mature native planting within the site (street trees and elsewhere through the site) would have the impact of reducing the capacity of the site in this sensitive location.

h) What is the land ownership position and is the site currently being promoted by a developer?

It is assumed that the land required for the access road from Mill Street is available.

i) Are the site-specific requirements for development of the site justified, consistent with national policy and would they be effective?

The site-specific requirements for development of the site are not justified, consistent with national policy and would not be effective.

The inadequacies of the landscape component of the policy are set out in the response to question e).

In relation to access, Policy W07/1 Land Adjacent Holkham Road requires '*provision of convenient and safe vehicular access to the site from Mill Road*', and minor modification PMIN/17.2/04 now allocates land for access to the site. However, this is contradicted by Para. 17.2.5 which states that development proposals will have to take into account: '*provision of suitable vehicle access off Mill Lane or Holkham Road*'.

Vehicular access from Holkham Road to the site would result in a wide bell mouth entrance and visibility splays to Holkham Road together with engineering works necessary to overcome the height difference between the road and the site and the removal of a length of hedge which lines this approach to Wells from Holkham. A new access road and footpaths with the inevitable signage, lighting and parked cars would urbanise the rural character of this approach to the town and have a significant adverse effect on the AONB.

The reference to vehicular access to Holkham Road may represent residual text from the HELAA, 2017 which reviewed a larger site which extended to Holkham Road. The HELAA states '*The site has direct access available from Holkham Road (C Road), which is considered could provide suitable access.*' This historic reference and ambiguous text perpetuates itself in the site name 'Land Adjacent Holkham Road' which is now misleading and inaccurate.

Finally, land is not allocated for the provision of cycle and step free pedestrian access from/to Bases Lane and Holkham Road, including footway improvements to a minimum width of 2.0m between the Holkham Road pedestrian and cycle access and the boundary of the property known as 4 Laylands Yard (as required by Policy W/07/1).

j) Given the components of the proposal and the site requirements, would development of the site be viable?

The proposed modifications would not be likely to make development of this site unviable. Fronting the access road with development may make the construction of this infrastructure more viable.

k) Overall, is the site deliverable within the plan period and is the expected timescale for the development of the site set out in the Council's updated housing trajectory realistic? Has the landowner/developer confirmed this?

It is assumed that the land required for the access road from Mill Street is available.

The site is underlain by a defined Mineral Safeguarding Area for sand and gravel and Policy W07/1 states that development on this site should address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority. This policy states that the County Council will oppose development proposals which would prevent or prejudice the use of safeguarded sites for those purposes unless suitable alternative provision is made. This accords with the NPPF which states that local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working (Para. 218). In order to demonstrate availability, the District Council should confirm that the County Council find this allocation acceptable within the terms of their adopted Minerals and Waste Core Strategy.

Extra Question l) Does the proposal constitute a major development in the AONB, and if so does it satisfy the test set out in NPPF paragraph 177?

In accordance with the NPPF (Para. 183), this is a matter of judgement taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined. As currently proposed, it could be argued that, as currently framed, Policy W07/1 represents major development given the significant adverse impact on the AONB.

Extra Question m) As part of a larger field, how has the site boundary been determined?

The current allocation does not have a well defined northern boundary and, as a result of additional land being allocated in the 'access field' should be drawn tighter to the urban edge to increase the openness of the remainder of the site. As previously proposed, the open space allocation could be reorientated into an east-west alignment along the northern boundary of the site to provide a well defined soft edge to development at this high point in this sensitive landscape.

Proposed Modifications to W07/1 Land Adjacent Holkham Road

Amend the wording of W07/1 Land Adjacent Holkham Road as follows:

Policy W07/1 Land north of Mill Lane

Land amounting to 2.6 hectares (*amend site area to include the 'access field' and other pedestrian cycle links specifies in the policy and a reduction in the northern extent of the site allocated*), as defined on the Policies Map (*similarly amend Policies Map*), is allocated for residential development of approximately 40 dwellings, 0.6 hectares public open space, and associated on and off-site infrastructure.

Planning permission will be granted subject to compliance with the policies of this Plan, and the following site specific requirements:

1. Delivery of high quality *landscape led* design that pays careful attention to site layout, building heights and materials in order to *conserve and enhance the* Norfolk Coast AONB and long distance wider landscape views and minimises any potential impacts on Holkham Hall Registered Park and Garden (Grade I) to the south and west of the site, and to the Wells Conservation Area directly adjacent to the north east and east of the site;
2. Retention and enhancement of mature hedgerows and trees around the site boundaries including provision of *strategic landscape buffers* along the northern and eastern boundaries;
3. *Provision of a substantial cover of additional mature native trees within the site to form the backdrop and setting for development and a landscaped skyline whilst enhancing biodiversity and biosecurity resilience;*
4. Provision of 0.6 ha of high quality public open space including facilities for play & informal recreation;
5. Provision of a convenient, safe *and tree-lined avenue* to provide vehicular and pedestrian access to the site from Mill Road, in accordance with the requirements of the Design Manual for Roads and Bridges (DMRB) and to the satisfaction of the Highway Authority.
6. Provision of cycle and step free pedestrian access from Mill Road through the site and public open space to both Bases Lane and Holkham Road, including footway improvements to a minimum width of 2.0m between the Holkham Road pedestrian and cycle access and the boundary of the property known as 4 Laylands Yard;
7. Submission, approval and implementation of a Surface Water Management Plan ensuring that there *are* no adverse effects on European sites and greenfield run off rates are not increased;
8. Submission, approval and implementation of a Foul Water Drainage Strategy including details of any off-site mains water reinforcement, enhancements and setting out how additional foul flows will be accommodated within the foul sewerage network; and,
9. Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS).

The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority. *(Consultation should confirm that this requirement is acceptable to NCC and the wording amended accordingly).*