

From: [Nick Westlake](#)
To: [Linda Yarham](#)
Subject: FW: PF/18/2051 - Woodlands Holiday Park, Cromer Road, Trimmingham - Landscape Comments
Date: 05 August 2019 12:56:23
Importance: High

2nd Response 04/06/2019

Further to the receipt of amended documents for the above application, the following additional comments are given.

In Section 3.2 of the Additional Information statement received from Parker Planning Services (PPS) in regard to the area of dispute over the assessment of the impact of the proposals in the LVIA, PPS suggests that this is a “subjective matter and open to interpretation”. This is incorrect as the purpose of an LVIA is reduce the subjectivity in landscape assessment and base this upon defined methodology. The Landscape Section’s assessment of the impact of the development as *moderate* is based on the applicant’s own methodology as defined in the LVIA, therefore the Landscape Section remain committed that the magnitude of the development will result in a *high* negative effect in the short and medium term. As such this is a significant material consideration for development within a nationally valued landscape, the AONB.

The reduction in the number of lodges and additional landscape planting and bunding will not alter the level of harm to the key characteristics of the AONB and landscape character, therefore the Landscape Section retain their position of objection to the development for the reasons as set out in their email dated 12th April 2019.

The application should be refused under policies EN1, EN2 and EC10 of the Core Strategy.

Nick Westlake
Senior Planning Officer
+441263 516313

1st Response 12/04/2019

Comments were provided by the Landscape Section regarding development proposals for Woodland’s Caravan Park site in the pre-application enquiry ref. DE21/17/0153, which included

a proposed extension to the south of the existing Holiday Park for lodge style caravans. Some of these observations remain pertinent to this current planning application.

Subsequent to the pre-application enquiry, the Local Planning Authority have published a new North Norfolk Landscape Character Assessment (November 2018) to provide an up-to-date evidence base for the emerging Local Plan. This document has been published in final form and represents the most up-to-date and accurate assessment of the District, based on current best practice and in line with the requirements of the latest NPPF. Public consultation is expected to take place in May 2019, with adoption as a Supplementary Planning Document (SPD) in Autumn 2019. The document is available on the NNDC website and it is the view of the Local Planning Authority that the baseline environment needs to take account of this new resource to help inform the management of future change and to ensure consistency with the NPPF (including paragraphs 151 and 154).

As requested in the pre-application enquiry response, a Landscape and Visual Impact Appraisal (LVIA) has been submitted as part of the application. This will be referred to in the assessment of the application, however it should be noted that the LVIA does not take account of the most up to date LCA mentioned above and where discrepancies arise these will be noted.

As stated in the Landscape Section's pre-application enquiry response the development site is located within the Norfolk Coast AONB, with policy EN1 of the Core Strategy relevant. This policy aims to ensure that development does not detract from the special qualities of the AONB. Furthermore, the policy states that *"proposals that have an adverse effect on the Norfolk Coast AONB will not be permitted unless it can be demonstrated that they cannot be located on alternative sites that would cause less harm and the benefits of the development clearly outweigh any adverse impacts"*.

Also of significant note is paragraph 172 of the NPPF, this states that great weight should be given to conserving landscape and scenic beauty in AONBs, which have the highest status of protection in relation to these issues. The Landscape Section note that within the submitted LVIA (in section 3.2 National Planning Policy) when referring to national policies relating to the development the document fails to mention paragraph 172 which deals specifically with development within the AONB.

The key characteristics of the AONB are summarised in the 2014 - 2019 Norfolk Coast AONB Management Plan and include maintaining the diversity of character types and settlement pattern, and maintaining the sense of remoteness, tranquillity and wildness leading to dark night skies.

National Planning Policy Guidance states that one of the core principles of the NPPF is that planning should recognise the intrinsic character and beauty of the countryside (Para. 001 Ref. ID:8-001-20140306). Furthermore, national guidance states that planning permission should be refused for major development in AONBs except in exceptional circumstances and where it can be demonstrated to be in the public interest (note: *major development* is to be defined by the decision taker) (Para. 005 Ref. ID: 8-005-20140306).

An assessment of the development proposed within the application with respect to the impact on the Norfolk Coast AONB and landscape character will be given by the Landscape Section in

view of national and local policy requirements:

Context/baseline situation

The National Character Area profiles prepared by Natural England and described in the LVIA provide a useful baseline on the unique character areas of the Country. The development site is located within National Character Area 78: Central North Norfolk. The area is defined as a predominantly tranquil place and an ancient countryside with a long-settled agricultural character where arable land is enclosed by winding lanes and hedgerows, interspersed with woodland and remnant heath and dissected by lush pastoral river valleys. The profile states that the main pressures for change to the area are posed by growth and a need to accommodate increased development, as well as managing ongoing visitor pressures in coastal areas. The Landscape Section consider that the development site accords well with the national character area description.

At a local level the development site is located within the boundaries of two distinct 'Character Areas'. As stated in the submitted LVIA, the site is located within both the *Mun Valley (SV6)* area and the *Sidestrand to Mundesley Coastal Town and Villages (CTV3)* area (according to the previous North Norfolk Landscape Character Assessment June 2009). While the boundaries for the character areas remain the same in the most up to date LCA (in the context of where they intersect with the development site) the character areas have been reclassified and redefined in the updated LCA (November 2018) and are now defined as *River Valleys*, of which the site is within the *Mundesley Beck Valley (RV6)* character area and the *Coastal Shelf* character area, of which there is one, the *Weybourne to Mundesley Coastal Shelf (CS1)*. It should also be noted that the boundaries of the *River Valley* character areas are blurred and should be read in context with the neighbouring landscape type.

In the baseline assessment of the landscape character, the submitted LVIA refers to the 2009 LCA which concluded that the landscape is moderately sensitive to change and would benefit from proposals to restore landscape features (pages 17 to 18). In the updated North Norfolk LCA the valued features and qualities of RV6 *Mundesley Beck* include the intimate, contained rural character, where small field sizes combine to provide intimacy and a strong sense of place on the valley floor, with an overall character of a rural, wooded, enclosed, pastoral landscape. A further valued feature and quality is the variety of landscape elements and scenic views within the landscape, where visual perception changes rapidly from containment or partial containment on the valley floors (depending on the individual valley landform and degree of screening from woodland and/or hedgerows) to extensive views from valley crests.

The CS1 (*Weybourne to Mundesley Coastal Shelf*) character area covers a coastal strip of land, around 12 miles in length but only 1 mile deep. While the some of the Districts principle settlements and historic holidays towns of Cromer, Sheringham, Overstrand and Mundesley are incorporated into the Coastal Shelf, the more undeveloped parts lie within the Norfolk Coast AONB. The valued features and qualities of CS1, in the updated North Norfolk LCA include the recreational opportunities provided by the network of footpaths, tracks and open access land; and the separate identity of coastal settlements, which provide a sense of place and historic and visual interest. The small areas of arable farmland, woodland and other semi-natural habitats are important in providing visual separation, reinforcing a settlement's sense of place and setting. Furthermore, the updated LCA notes that the valued features and qualities of the *Coastal Shelf* are considered to contribute positively to the key qualities of the Norfolk Coast

AONB, including the dynamic character and geomorphology of the coast, strong and distinctive links between land and sea, diversity and integrity of landscape, seascape and settlement character and the sense of remoteness, tranquillity and wildness.

While it is noted that the LVIA baseline assessment of the development site is based on the now superseded LCA, the Landscape Section concur with the assessment that the Woodland Holiday Park as a whole provides a “*positive contribution to the character of the area*” as defined in Table 1 of the LVIA. The LVIA goes further to conclude that the development proposal would provide a “*relatively positive contribution to the landscape of the Mun Valley*” (page 19), however the Landscape Section dispute this as this judgement has not been properly justified in the LVIA. Some elements of the development, such as the provision of woodland planting, may contribute positively to the landscape character however that is at the cost of the more considerable impact of the woodland style lodges and bases, verandas, roadways and lighting on the landscape.

In the baseline assessment of the existing visual amenity, the LVIA concludes that the site provides *good* (as defined in Table 2) visual amenity within the near to mid distance views. The LVIA recognises the development site is viewed from local footpaths on the Paston Way and from quiet lanes to the south within the Mun valley. The Landscape Section concur with this assessment.

In terms of landscape quality, while recognising the value of the landscape at a national level in terms of its designation as an Area of Outstanding Natural Beauty, the LVIA considers at a local level the quality of the landscape to be “*good/high*” (as defined in Table 3). The Landscape Section note that the definition of a *high* quality landscape in Table 3 includes designated landscapes such as the AONB, but disagree with the LIVA assessment that the existence of detracting features (quoted as being the relatively modern housing units, industrial estates and the Woodlands Holiday Park itself) make the area slightly less susceptible to change. The definitions of *good* and *high* quality landscapes include landscapes that are intact or mostly intact, therefore it is unclear how the LVIA has concluded that the “*area as a whole is moderately able to accommodate change without serious negative effect*”?

National Policy

The Landscape Section consider that, as a starting principle, the proposed development (installation of 68 static holiday lodges and associated infrastructure) is unacceptable given that it is major development within the AONB and cannot be defined as an exceptional circumstance. However, further consideration is given to para. 172 of the NPPF which, when considering applications for development in the AONB, requires an assessment of *inter alia* any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

In the assessment of the effects on the development on landscape receptors, the LVIA suggests that while the site is important (and has a *high* sensitivity) the location of the development site within the wider context of the AONB and “*wholly intact areas*”, makes the site relatively less sensitive to development. The LVIA has previously acknowledged in the baseline assessment of the site that it is in a *good* to *high* quality landscape, which by its own definition includes landscapes that are intact or mostly intact. Furthermore, the most up to date LCA states that the valued features and qualities of the local landscape character areas are considered to contribute

positively to the key qualities of the AONB. The Landscape Section considers that the landscape elements of the site positively contribute to the AONB, incorporate key qualities of the AONB and can be considered intact and therefore the sensitivity of the site should not be reduced within the assessment.

The Landscape Section suggest that the landscape elements and valued the features identified in the updated LCA, such as the variety of landscape elements and scenic views within the landscape and the recreational opportunities provided by the network of footpaths, will be adversely affected by the development, by the detracting visual elements of the scheme and disagrees with the LVIA assessment that the proposed development is relatively “*low impact*” and “*would not be thought to be damaging to the surrounding landscape receptors*”.

The Landscape Section concur with the LVIA’s assessment that the development will have a *major negative* effect in the context of the AONB prior to mitigation, but disagree with downgrading of the magnitude of effect on landscape receptors to *minor* after mitigation. The Landscape Section consider that the positive effects of the development have been overstated and that the duration of the impact over the long term suggests that the magnitude should be, at least, *moderate* as defined in Table 6 of the LVIA.

The LVIA states that the magnitude of the visual effect of the development will be *high negative* in the short term and the Landscape Section concur with this assessment but suggest that the effects of the development will go beyond the short term into the medium term (at the very least) given the time taken for the mitigation planting to establish to be effective.

With regards to para. 172 of the NPPF, the development will have a detrimental effect on the AONB and local landscape character and visual amenity, which is acknowledged in the submitted LVIA. Furthermore, the negative impact on *highly* sensitive users (recreational cyclists and ramblers) of the network of public rights of way will be *very high* in the short to medium term, although it is acknowledged that this will reduce over time. Therefore there will be an impact on the recreational opportunities in the area. The Landscape Section acknowledge the attempts to design and mitigate the impacts of the development down to an acceptable level, however it is considered that the mitigation is insufficient, and will take too long to establish, to outweigh the harm to the landscape. Therefore, having taken into consideration the great weight that should be afforded to conserving landscape and scenic beauty in the AONB, the Landscape Section conclude that the development would be contrary to national policy.

Local Policy (EN1/EN2/EC10)

The Landscape Section have highlighted why it considers that the development will have a detrimental impact on the AONB, including the key qualities, resulting in an adverse effect in the AONB. This too is acknowledged in the submitted LVIA. As such the development does not meet with the requirements of policy EN1 of the Council’s Core Strategy.

Where harm has been established, policy EN1 requires the application to demonstrate that it cannot be located on alternative sites that would cause less harm and the benefits of the development outweigh any adverse impacts. The LVIA includes a sequential testing of alternative proposal sites including referencing an assessment carried out by CJ Yardley as part of previous proposals for additional holiday accommodation development at the site. In the LVIA it states that all of the sites assessed as part of the CJ Yardley Sequential Test (April 2013) have

negative effects on the landscape. Out of the three sites in the 2013 assessment, Site 1 was considered to be the least sensitive to development and was subsequently developed and Site 2 and 3 were dismissed in the LVIA as being unsuitable for the development due to the high amenity, biodiversity and landscape character value. Site 3 is the subject of this application.

While the sequential test in the LVIA considered development within the existing areas of woodland in the current caravan park, these were mainly dismissed due to economic viability issues rather than landscape issues. However, the topography of the site was stated as a key limiting factor in dismissing the potential to incorporate the proposals into the existing Holiday Park site, suggesting large numbers of trees would need to be removed to create level areas. However, development of 11 timber holiday lodges within the existing woodland was approved in 2009 (planning ref. 09/0803), which was located on the sloping valley side, within existing woodland and did not necessitate the removal of significant numbers of trees, thus proving that it may be possible to site some number of lodges within the existing site.

With regard to the benefits of the development, the Landscape Section recognise that Woodlands Holiday Park is an important tourist facility and business in the area providing both employment and tourist accommodation, however the site has seen continued growth and expansion over several decades. The Landscape Section are concerned that moves to address the holiday market through the growth of the existing site is unsustainable with the landscape having limited capacity to absorb additional growth. Opportunities for employment and tourist accommodation in the District can be provided in less sensitive locations.

Policy EN2 requires development proposals to demonstrate that their location, scale, design and materials will protect, conserve and where possible enhance the distinctive landscape character of the District as informed by the LCA. As noted previously, while the Landscape Section acknowledge that some elements of the development will introduce features that may enhance the landscape character in the long term, the short and medium term impacts will be significant. Furthermore, other elements of the development proposal will erode the landscape character and visual amenity.

In the updated LCA, the overall vision for the *Mundesley Beck* character area (RV1) is an intimate and small scale landscape, where new development is appropriate in scale, unobtrusive and readily accommodated into its landscape setting. This development cannot be readily accommodated within the landscape (resulting in a *major negative* effect in the landscape and AONB as acknowledged in the LVIA) and requires significant and high level mitigation planting to reduce the effects over the long term. While woodlands and hedgerows are a major landscape element in the vision for the character area, and can be used to limit the visual influence of development, the use of such landscape planting to justify the adverse impacts of the development cannot be substantiated.

On balance, the Landscape Section consider that the development does not meet with the requirements of policy EN2.

Policy EC10 of the Core Strategy does not permit new sites within the AONB, and the extension or intensification of existing sites will only be permitted where there is a very high standard of design and landscaping, with minimal adverse impact on its surroundings, and when the proposal accords with other Core Strategy policies. As has been demonstrated the development

will have an adverse effect on the AONB and landscape character and does not provide adequate mitigation to reduce the effects to an acceptable level in an acceptable timeframe and does not therefore accord with local and national policies.

Arboriculture

An Arboricultural Report has been submitted with the application that states that no trees are identified for removal at this stage, however this is caveated by the expression that some trees may be required to be removed to improve access into the site. The report concludes by stating that no construction activities should take place within the RPAs except as indicated in an agreed method statement and suggests that the development can be accommodated on the site with minimal impacts on the trees.

Given that the development requires level changes, underground utilities and hard surfacing it is not clear why the development proposals have not been accurately assessed as part of the Arboricultural Report, and plotted on a Tree Protection Plan, to gain a greater level of understanding of the impact on the important trees surrounding the site. There remains a degree of uncertainty as to the impact of the development on trees surrounding the site.

Ecology

A Preliminary Ecological Appraisal Report has been submitted with the application. This suggests that the principle impact of the development on ecological receptors is at the site-level. The hedgerows on the site have been assessed as being a habitat of principle importance under the NERC Act, however in general the habitats within the development footprint are common and widespread. A number of trees are considered to support Potential Roost Features for bats and the hedgerows are considered to provide suitable foraging and commuting habitat for bats.

Standard mitigation and enhancement measures for bats and other wildlife are recommended.

The plans appear to illustrate that the woodland lodges will be constructed very close to the woodland edges, reducing the favourability of this habitat for foraging and commuting bats. The lodges should be moved further away from the woodland edge to maintain a buffer strip for commuting and foraging bats.

Conclusions

Having considered the benefits of the development, the Landscape section does not consider that these elements outweigh the landscape and visual impact of a large number of woodland style lodges and associated infrastructure in the AONB and the *River Valleys* and *Coastal Shelf* character areas.

The Landscape section concludes that the proposals are contrary to EN1, EN2 and EC10 of the Core Strategy as well as not complying with national policy.

The development proposal is therefore recommended for refusal.