

STIFFKEY – PF/20/1202: Conversion of former army training buildings into four holiday lets suitable for disabled persons: Former Army Buildings, Greenway, Stiffkey for L G Harrison & Son

Target Date: 10 December 2020

Case Officer: Jayne Owen

Full application

CONSTRAINTS

LDF Tourism Asset Zone

SFRA - Areas Susceptible to Groundwater Flooding

Public Right of Way

EA Risk of Flooding from Surface Water 1 in 1000

Landscape Character Area

Area of Outstanding Natural Beauty

LDF - Countryside

Undeveloped Coast

A Road

Development within 60m of Class A road

RELEVANT PLANNING HISTORY

PF/19/2122

Former Army Buildings, Greenway, Stiffkey

Conversion and alterations of former army training building to four holiday lets - Refused 4 March 2020 on the following grounds:

1. The site lies within an area designated as Undeveloped Coast where it is considered that the proposed development does not require a coastal location and would be detrimental to the distinctive open coastal character of the designated Undeveloped Coast, contrary to Policy EN 3 of the adopted Core Strategy and Paragraph 170 of the NPPF.
2. The development site is isolated from the main settlement of Stiffkey and from the campsite and surrounding buildings on Greenway. The development and access would be visible on the rise of land from the coast path and the domestication of the site through the conversion of the buildings to holiday accommodation and thereby introducing domestic features into the landscape such as cars, people and light will have an adverse impact on the special qualities of the AONB, namely that of tranquillity, sense of remoteness and wildness and the strong and distinctive links between land and sea and will have significant impacts with respect to light pollution. The development will not protect or conserve the distinct features of the local landscape character or the AONB and would therefore not comply with Policies EN 1 and EN 2 of the Core Strategy and Paragraph 172 of the NPPF.
3. The site is within the Rolling Open Farmland (ROF) landscape character type, as defined in the North Norfolk Landscape Character Assessment document (LCA) 2018. However, the site is heavily influenced by and influences on the adjacent Open Coastal Marshes (OCM) landscape character type to the north. Many of the valued features and qualities of the Rolling Open Farmland and Open Coastal Marshes landscape types are considered to positively contribute to the key qualities of the AONB. Of significant concern for the

OCM landscape type is the potential for changes in the neighbouring areas inland to affect views and character attributes in the OCM. Key to retaining the character of the ROF Type is conserving the openness, tranquillity and rurality of the landscape which has limited capacity to visually contain development. Furthermore, the LCA landscape guidelines for the OCM type require the protection and enhancement of its wild and remote character through the careful consideration of development in adjacent inland landscape types (including the consideration of lighting at night). The development will significantly detract from the valued features and qualities of both the ROF and OCM landscape character types and is not therefore compliant with Policy EN 2 of the Core Strategy and Paragraph 172 of the NPPF.

4. Policy EN 4 requires development proposals to retain existing important landscaping and natural features and include landscape enhancement schemes that are compatible with the Landscape Character Assessment and ecological network mapping. Insufficient information has been submitted to demonstrate that the application would accord with Policy EN 4 of the Core Strategy in terms of existing and proposed landscaping.
5. Policy EN 9 requires that all development proposals should protect the biodiversity value of land and buildings and minimise fragmentation of habitats; maximise opportunities for restoration, enhancement and connection of natural habitats. The application is not supported by an ecological impact assessment and therefore insufficient information has been submitted to demonstrate compliance with Policy EN 9 of the North Norfolk Core Strategy.
6. Inadequate visibility splays are provided at the junction of the access with the County highway and this would cause danger and inconvenience to users of the adjoining public highway contrary to Policy CT5 of the adopted Core Strategy.
7. As far as can be determined from the submitted plans, the Applicant does not appear to control sufficient land to provide adequate visibility at the site access. The proposed development would therefore be detrimental to highway safety contrary to Policy CT5 of the adopted Core Strategy.

THE APPLICATION

The application seeks planning permission for the conversion of former army training buildings into four holiday lets suitable for disabled persons. The application is accompanied by Design and Access Statement (DAS) and a 'Heritage Statement and AONB Assessment' in support of the application.

The DAS states the building is an ex canteen for an historic World War Two artillery training camp and that the proposal will preserve an important historical building; that the proposal represents an important farm diversification scheme and will help to boost the amount of tourist accommodation that is in great demand especially with the very reduced capacity in camping sites (whilst not specifically stated, it is assumed owing to the Covid-19 pandemic).

The report also refers to the local tourist facilities in area and includes reference to the fact that the Stiffkey Salt Marshes create an extensive habitat for a wide range of birds and plant life, one of the richest in the country with access to rich nature, wonderful walks, local facilities including a pub and a shop and access to the North Norfolk Coastal Path.

REASONS FOR REFERRAL TO COMMITTEE:

At the request of the Ward Member (Cllr Karen Ward) for the following reasons:

- There is a trade-off between landscape considerations and the diversification of a rural business.
- There are existing buildings which are already in the landscape and the intention is to renovate them, so cannot see how the resulting development is any more intrusive than the existing structures. The alternative of large scale agricultural structures would be far more intrusive in the landscape, so it should be considered under EC2 alongside EC4 and EC7.
- Given the existing beach car park, museum and camping site, the additional traffic would be marginal at best. If the site was used for agricultural storage, which is the alternative use, there would be significantly more impact with large scale agricultural vehicles visiting the site.
- The plans indicate a very low level of lighting relative to lighting that would be possible on an agricultural storage structure.
- A sensitive refurbishment of the existing structures is a preferable use of this site than risking large scale agricultural storage structures which will be very visible on the sky line - as evidenced on the other side of the road.

PARISH COUNCIL:

The Parish Council has a neutral position on the application, but supports the view that should the application be approved the light pollution be minimised by placing a condition which ensures lighting adheres to the plans as laid out in the document '*lighting impact assessment and strategy*', which forms part of the application.

The Parish Council does have some concerns about the increase in traffic, over Greenway, in order to gain access to the wider road network, via the A149, which has restricted levels of visibility in both directions. A compensatory reduction in the number of pitches/vehicular access to the neighbouring camp site/static home site, could be a way in which this is mitigated.

REPRESENTATIONS:

Two representations have been received from the same person raising the following summarised concerns. The representations are available to view in full on the Council's website.

- the proposal will have an adverse visual impact and severe impact upon the sense of open space, remoteness and tranquillity characteristics of its very sensitive location. The location and access are unsuited for the stated purposes and the claimed benefits are simply not available or achievable.
- the claimed historical merits and significance of the utilitarian buildings which were erected as temporary facilities in the second world war are questionable.

The buildings are of no value and detract from the true historic significance of this special part of the coastline which is renowned and valued for its sense of remoteness, natural beauty and tranquillity. The access and relative remoteness of the site do not make the promoted use viable or sustainable.

County Council (Highways):

Object to the proposal on highway safety grounds.

Landscape Officer:

Objects to the proposal and recommends refusal on the grounds that it is contrary to Policies EN 1, EN 2, EN 3 and EN 9 and as such is also contrary to Policy EC 2 which requires that development should be in accordance with other policies seeking to protect biodiversity, amenity and the character of an area.

Environmental Health:

No objections subject to an advisory note relating to potential contamination from the storage of oil/fuel/agrochemicals, disposal pits etc).

NCC Public Rights of Way and Green Infrastructure:

No objection in principle to the application, but highlight that some of the proposed access is coincident with a Public Right of Way, known as Stiffkey BOAT (byway open to all traffic) 9. The full legal extent of this PRow must remain open and accessible for the duration of the development and subsequent occupation.

Norfolk Coast Partnership:

Recognises the benefits of improving local tourist facilities and the survival of local heritage buildings but note the proposal is in open countryside in a relatively isolated location. Whilst there are links to nearby services there is a risk that the proposal will increase visual disturbance and will not conserve or enhance the setting of the AONB in line with Policies EN 1, EN 2 or para 172 of the NPPF.

The site lies in the Rolling Open Farmland character type of the Integrated Landscape Character Assessment for the AONB. Key forces for change in the landscape are potential farm diversification, resulting in conversion of agricultural buildings to houses and recreational facilities. Pressure for development of second or holiday homes. Increased pressure on rural roads as a result of increased second home ownership, and increased tourist activity along the North Norfolk Coast.

The guidance suggests conserving the typical long open views, this is a relatively undeveloped rural landscape with little scope for mitigating impacts of built development or tall structures. Lighting and presence of cars would add to the visual disturbance. It is stated in the Landscape Character Assessment that new farm buildings or conversions require exceptionally high standards of siting and design in order to integrate well into this landscape area. It is important that gaps are maintained between settlements to retain open views and conserve the sense of

remoteness, tranquillity and wildness which is a key quality of the AONB designation and also ensures a more sustainable approach to development.

It is noted that the new application has sought to address issues relating to visual impact by increasing planting around the periphery of the site and utilising existing access. Until the trees and hedges have established however, there will be short to medium term disturbance particularly from the north on the coast path. There will also be movement in terms of people and cars which is harder to mitigate although parking areas have also been identified for planting hedges.

Light pollution has been considered on site however, there are concerns over the parking bollards as they are not fully shielded, therefore there could be some light spillage which again would add to visual impact. Whilst it is understood some external lighting is needed it would need to be at a minimum and fully shielded downward facing.

In summary, there are still concerns that there will be increased visual disturbance on site and that the proposal conflicts with Paragraph 172 of the NPPF and Policies EN 1 and EN 2 to conserve and enhance.

Norfolk Landscape Archaeology:

No objection subject to a condition

Economic Development

Comments currently awaited. An update will be provided at the meeting.

HUMAN RIGHTS IMPLICATIONS

It is considered that the proposed development may raise issues relevant to

Article 8: The Right to respect for private and family life.

Article 1 of the First Protocol: The right to peaceful enjoyment of possessions.

Having considered the likely impact on an individual's Human Rights, and the general interest of the public, approval of this application as recommended is considered to be justified, proportionate and in accordance with planning law.

CRIME AND DISORDER ACT 1998 - SECTION 17

The application raises no significant crime and disorder issues.

POLICIES

North Norfolk Core Strategy (Adopted September 2008):

SS 1 - Spatial Strategy for North Norfolk

SS 2 - Development in the Countryside

EN 1 - Norfolk Coast Area of Outstanding Natural Beauty and The Broads

EN 2 - Protection and enhancement of landscape and settlement character

EN 3 - Undeveloped Coast

EN 4 - Design

EC 2 - The re-use of buildings in the Countryside

EC 9 - Holiday and seasonal occupancy conditions

EN 8 – Protecting and Enhancing the Historic Environment
EN 9 - Biodiversity and geology
CT 5 - The transport impact of new development
CT 6 - Parking provision

National Planning Policy Framework (NPPF):

Section 2 - Achieving sustainable development (paragraphs 7, 8, 9, 10, 11, 12)
Section 6 - Building a strong, competitive economy (paragraph 83)
Section 9 - Promoting sustainable transport (paragraphs 108, 109, 110)
Section 12 - Achieving well-designed places (paragraphs 124, 127, 128, 130)
Section 14 - Meeting the challenge of climate change, flooding and coastal change (paragraph 148)
Section 15 - Conserving and enhancing the natural environment (paragraphs 172, 173, 174, 175)
Section 16 - Conserving and enhancing the historic environment (paragraph 187)

MAIN ISSUES FOR CONSIDERATION

1. Principle
2. Design
3. Landscape/Environmental Considerations
4. Ecology
5. Highways
6. Archaeology
7. Contaminated Land

APPRAISAL

1. Principle (Policies SS 1, SS 2 and EC 2):

The proposed development is situated in the area designated as Countryside under Policy SS 1. Within the countryside development is limited to that which requires a rural location and is for one of a number of types of development set out in Policy SS 2. This includes the re-use and adaptation of buildings for appropriate purposes and recreation and tourism.

Policy EC 2 permits the re-use of buildings in the countryside for non-residential purposes where the policy's criteria are met. For economic uses (including holiday accommodation) this must be appropriate in scale and nature to the location. In addition, it must be demonstrated that the building is soundly built and suitable for the proposed use without substantial re-building or extension and the proposed alterations protect or enhance the character of the building and its setting.

In addition, the proposal must accord with other policies seeking to protect the biodiversity, amenity and the character of the area. The latter requirement is discussed under the relevant sections in the report below.

The application is accompanied by a structural report which concludes that whilst there is considerable work involved to remove the existing render, the basic masonry structure appears sound.

The application is a resubmission of a previous application which was refused under PF/20/2122.

In conclusion, Policy SS 2 permits the re-use and adaptation of buildings in the countryside including the re-use of buildings for recreation and tourism in principle.

Policy EC 2 also permits the re-use of buildings in the countryside for non-residential purposes but only where a proposal complies with its criteria. The proposal complies in part with Policy EC 2 as the scale of the building will remain unchanged and it can be converted without substantial rebuilding or extension. However, the proposal fails to accord with other policies seeking to protect the setting, biodiversity, amenity and character of the area and therefore the proposal fails to fully satisfy the requirements of Policy EC 2.

The application is contrary to both national and local plan policies for the reasons stated and is unacceptable in principle having regard to EC 2.

2. Design (EN 4)

Policy EN 4 states that all development should be designed to a high quality, reinforcing local distinctiveness. Design which fails to have regard to local context and does not preserve or enhance the character and quality of an area will not be acceptable.

The existing roof is profiled asbestos sheeting on timber purlins supported on mainly timber trusses but with a few masonry cross walls. There is a substantial high level roof vent to the longer leg wing. The floors are of concrete construction. The external footprint of the building would remain unchanged. External alterations would comprise removal of the existing render, re-rendering in through coloured render and re-roofing with corrugated fibre cement roofing (dark grey). Doors and windows would be powder coated aluminium (dark grey).

Notwithstanding, the proposed re-rendering and replacement of the roof, there are no overriding concerns in design terms as the existing footprint and form of the buildings would be largely maintained with external alterations utilising existing openings.

It is considered the proposal accords with Policy EN 4.

3. Landscape/Environmental Considerations (EN 1, EN 2, EN 3)

Area of Outstanding Natural Beauty

Policy EN 1 requires that the impact of individual proposals, and their cumulative effect, on the Norfolk Coast AONB, and its setting, will be carefully assessed. Development will be permitted where it meets the following criteria:

- is appropriate to the economic, social and environmental well-being of the area or is desirable for the understanding and enjoyment of the area;
- does not detract from the special qualities of the Norfolk Coast AONB; and
- seeks to facilitate delivery of the Norfolk Coast AONB management plan objectives

Proposals that have an adverse effect 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.

Development proposals that would be significantly detrimental to the special qualities of the Norfolk Coast AONB its setting will not be permitted.

The proposal is a re-submission of an earlier refused scheme however the same principle landscape and visual impact issues remain relevant.

The proposed re-use of these former army buildings as holiday units (now for disabled persons, which cannot reasonably be conditioned and therefore has little weight) is considered to be an inappropriate use, given the unsustainable location and the high sensitivity of the nationally designated AONB within which the site lies and the internationally designated North Norfolk Coast Special Protection Area which is located 200 metres north of the site. This is a designation specifically for the conservation of wild birds. It is important within Europe as being one of the largest areas of undeveloped coastal habitat. The saltmarsh is also a designated Site of Special Scientific Interest.

The intensification of the use of the site that would result from this development is considered to be inappropriate within this part of the Norfolk Coast AONB. This revised proposal includes for two sections of new hedge planting which it is considered would not mitigate for the increased disturbance from multiple car movements both by day and night when exacerbated by headlights, internal light spill from the new residential units, increased noise and external activity around the units.

It is stated within paragraph 2.2 of the Heritage Statement and AONB Assessment submitted with the application, that the site is not visible from the coast path. This is not the case. The site is visible from sporadic points along the coast path, particularly further west from the site. A track extends north from the site directly onto the coast path. The development would inevitably result in increased footfall onto the coast path in this location which could result in an incursion onto sensitive salt marsh resulting in increased human disturbance on a fragile habitat (North Norfolk Coast SAC) which is internationally designated both for its habitats and for its diverse summer and winter bird populations (Norfolk Coast SPA/Ramsar site).

The Norfolk Coast AONB is a national designation recognising the scenic beauty of a landscape, the conservation and enhancement of which is afforded 'great weight' within paragraph 172 of the NPPF.

Paragraph 172 states:

Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited. Planning 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. Consideration of such applications should include an assessment of:

- a) *the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*

- b) *the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
- c) *any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.*

The site is also situated within an area defined as Heritage Coast and therefore paragraph 173 of the NPPF is also relevant. Paragraph 173 requires that in these areas decisions should be consistent with the special character of the area and the importance of its conservation. Heritage Coast areas were established to conserve, protect and enhance the best stretches of undeveloped coastline in England.

Policy EN 1 of the Core Strategy requires that development should not detract from the special qualities of the AONB. This part of the Norfolk Coast AONB very much demonstrates the quality defined as *'a sense of remoteness, tranquillity and wildness.'* Domestication and intensification of the site as proposed would not reinforce this quality. Whilst there is activity from the campsite to the east of the Greenway, the application site is on land to the west of the Greenway which is quiet, undisturbed and dark at night.

The application is supported by a Lighting Impact Assessment and Strategy. This describes downward directional lighting on the sides of the building and on the end elevation, along with bollard lighting to the four parking areas. The precise location of the lighting is not shown on Plan JHA/19/20-5 Rev B, despite being referenced. The amount of external lighting that would be required, despite being downward directional, together with internal light spill from the numerous openings would have an adverse impact on the dark night skies which are a stated feature of the defined quality of *'a sense of remoteness, tranquillity and wildness'*.

For the reasons set out above, it is considered that the proposed development would not be compliant with the requirements of Policy EN 1 and nor would it conserve or enhance the scenic beauty of the designated landscape as required by paragraphs 172 and 173 of the National Planning Policy Framework.

Landscape

Policy EN 2 requires the protection and enhancement of landscape and settlement character. Proposals for development should be informed by, and be sympathetic to, the distinctive character areas identified in the North Norfolk Landscape Character Assessment and features identified in relevant settlement character studies.

The site lies within the Rolling Open Farmland (ROF) Landscape Type, as classified in the North Norfolk Landscape Character Assessment (Nov 2018), and is also very close to two other Landscape Types; Stiffkey River Valley (RV4) and Open Coastal Marshes (OCM1). Key characteristics of the ROF Type include *'an open homogenous character with expansive views'* gained from the high level topography, low cut hedgerows, lack of woodland cover and large field sizes and *'a sparse, strongly nucleated settlement pattern'*. The site is heavily influenced by and influences on the adjacent Open Coastal Marshes (OCM) landscape character type to the north. Many of the valued features and qualities of the ROF and OCM landscape types are considered to positively contribute to the key qualities of the AONB. Of significant concern for the OCM landscape type is the potential for changes in the neighbouring areas inland to affect views and character attributes in the OCM.

Stated Valued Features and Qualities of the ROF Type, which if diluted or adversely affected would detrimentally change the character of the landscape include ‘*an open expansive rural character with a sense of remoteness and tranquillity*’ and ‘*an undeveloped coastal character*’. The LCA landscape guidelines for the OCM type require the protection and enhancement of its wild and remote character through the careful consideration of development in adjacent inland landscape types (including the consideration of lighting at night).

It is considered that the development would significantly detract from the valued features and qualities of both the ROF and OCM landscape character types and is not therefore compliant with Core Strategy Policy EN 2 which requires that development proposals should demonstrate that their location, scale, design and materials will protect, conserve and where possible enhance the special qualities and local distinctiveness of the area and its nocturnal character.

Undeveloped Coast

The site also lies within Undeveloped Coast, as designated under Core Strategy Policy EN 3. This policy requires that in the Undeveloped Coast area only development that can be demonstrated to require a coastal location and that will not be significantly detrimental to the open coastal character will be permitted. The policy is intended to minimise the wider impact of general development, additional transport and to minimise light pollution on the distinctive coastal area. The submission has failed to justify that a coastal location is required and is therefore not compliant with this policy.

In summary, the application fails to accord with Core Strategy Policies EN 1, EN 2, EN 3 and paragraphs 172 and 173 of the National Planning Policy Framework.

4. Ecology/Biodiversity Considerations (EN 9)

Policy EN 9 requires that all development proposals should protect the biodiversity value of land and buildings and minimise fragmentation of habitats; maximise opportunities for restoration, enhancement and connection of natural habitats.

The absence of an ecological assessment was cited as a reason for refusal of the previous application. There is no survey information with this current application to determine the ecological baseline of the site. This is required given the site's location within an open rural setting (and less than 200m from the North Norfolk Coast SSSI and SAC/SPA/Ramsar – Habitats Sites), presence of adjacent woodland, and the dilapidated nature of the buildings.

The lack of ecological assessment does not enable the Council to fully determine the presence of protected species on the site as laid out in paragraph 99 of the Government Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System, which remains relevant under the NPPF. Para. 99 of the Circular states “*It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision*”.

Furthermore, the nature and the location of the development, tourism accommodation within an agricultural setting of rotating crop fields, and its proximity to the North Norfolk Coast Habitats Sites could result in an adverse effect on the interest features of those sites either directly or

indirectly, for example through the direct trampling of habitat or disturbance to bird species foraging on functionally linked land.

As a competent authority under the Conservation of Habitats and Species Regulations 2017 the Council has a duty to have regard to the Regulations and to determine if the development is likely to result in a significant effect on the Habitats sites. The applicant is required to provide the Council with such information as is reasonably necessary for the purposes of such an assessment.

Furthermore, the potential for disturbance to the North Norfolk coast habitat sites when considered in combination with the numbers of existing and potential visitors to the coast could result in adverse impacts on the designated sites and further consideration should be given to the significance of the impact in accordance with the best available information to date.

The application therefore fails to comply with the requirements of Policy EN 9 and paragraphs 172, 173, 174, 175 of the NPPF.

5. Highways (CT 5 and CT6)

Access to the site is proposed from Greenway to the east of the site. The applicant contends Greenway is already heavily trafficked and is shared with a number of residential and commercial premises, including static homes, a campsite, holiday lets, boat businesses repairing and building boats, a carpentry business, a farm, a museum and a National Trust car park for at least 20 cars.

Norfolk County Council Highways maintain their previous objection on highway safety grounds as follows:

The last use of this site was that of a military training establishment, exempt from planning control. Upon cessation of the military use, the land where these canteen buildings are located reverted to having nil legal use which has a minimal traffic generating capacity. In 1991 a temporary consent was granted for the siting of a caravan for use by an agricultural worker, however this consent was time limited until the 30th June 1994 and was not renewed.

As the agent indicates within the Design and Access Statement, the former army training base now operates as a camp site served from the east side of Greenway, which is a public right of way. The proposal to bring these redundant, disused buildings into use as disability focussed holiday lettings is considered to generate a minimum of 3 daily movements per unit, equating to an increase of some 12 daily movements, in addition to any increases in pedestrian footfall to and from the nearby facilities.

Pedestrian facilities are limited in Stiffkey, with an off-road provision only being partially available along the busy A149. Given the proposed use for disabled people, any increases would result in increased numbers of vulnerable road users sharing the narrow carriageway with other road users, which would not be an acceptable scenario and would be considered to be contrary to Core Strategy Policy CT 5 and the aims of the National Planning Policy Framework.

The proposed development would result in an increase in vehicular use over a substandard access track and public right of way, gaining access to the wider network via the junction with the A149, which has restricted levels of visibility to the west, permitting only 15 m of visibility from a 2.4 m setback position.

Norfolk County Council as the Local Highway Authority considers that an increased use as proposed would inevitably be detrimental to highway safety. Any use of the site outside of its use as agricultural land, would lead to increased traffic and pedestrian/vulnerable road user movements over a substandard road junction onto a 3B3 Special Route (A149) within the NCC Route Hierarchy, which should be resisted given the lack of emerging visibility onto a route of this stature.

In the light of the concerns raised by the Highways Authority, it is considered that the proposed development would be detrimental to highway safety and fail to accord with Policy CT 5.

6. Archaeology

Whilst no comments have been received from Norfolk Landscape Archaeology with respect this revised proposal, previously they provided comments as follows:

“The proposed development affects a heritage asset comprising former World War Two buildings associated with an anti-aircraft training camp at Stiffkey. The buildings were once part of a larger facility which operated until the 1950s. Structures included Nissen huts and gun emplacements. The proposed works will alter and affect the significance of the heritage asset which is worthy of recording prior to its conversion. If planning permission is granted, a condition to secure a programme of archaeological work in accordance with National Planning Policy Framework is recommended.”

There appears to be no reason why this advice would be different with respect to the current application and subject to the recommended condition, it is considered that the proposal would accord with Policy EN 8 and the NPPF with respect to archaeological impacts.

7. Contaminated Land

The Council's Environmental Health Officer has raised no objections subject to an advisory note for conversion of farm buildings and sites.

8. Other Matters

Whilst the applicant has made reference to the scheme being a ‘farm diversification’ scheme, insufficient information has been submitted in relation to the farming enterprise concerned as is required by Policy EC 1 to enable an appropriate assessment to be made in this respect. This includes full details of the nature and extent of the enterprise, its viability, income likely to be generated from the proposed development and how this would be used to contribute to sustaining the future viability of the agricultural enterprise as a whole. It is therefore considered that as submitted no weight can be given to this factor in the planning balance.

Whilst the scheme would make a modest contribution towards the tourism economy, in this instance it is not considered that this would be sufficient to outweigh the significant detrimental effect on the environment which it is also important to protect to ensure future tourism appeal.

Concerns have been raised that this proposal would be preferable to alternative large scale agricultural structures. In this respect any alternative buildings in this location would, as a minimum, be subject to a prior notification procedure and could be subject to a requirement for full planning permission if not deemed to be permitted development under the prior notification process. This application should therefore be considered on its own merits and not in terms any

fall-back position in this respect which would require consideration on submission of an application.

8. Conclusion

Policy SS 2 permits the re-use and adaptation of buildings in the countryside including the re-use of buildings for recreation and tourism in principle.

Policy EC 2 also permits the re-use of buildings in the countryside for non-residential purposes but only where a proposal complies with its criteria. These require not only that it can be demonstrated that the building is soundly built and suitable for the proposed use without substantial rebuilding or extension; that the proposed alterations protect or enhance the character of the building and its setting and that the proposal is in accordance with other policies seeking to protect biodiversity, amenity and character of the area.

In this regard, the application is contrary to both national and local plan policies for the reasons stated and is therefore unacceptable in principle having regard to EC 2 of the North Norfolk Core Strategy.

The application fails to satisfactorily demonstrate that the development requires a coastal location and would therefore also fail to comply with Policy EN 3 and paragraph 170 of the NPPF. The development would also be significantly detrimental to the special qualities of the Norfolk Coast AONB and Heritage Coast contrary to Policies EN 1 and EN 2, fails to demonstrate that the proposal would protect, conserve and enhance the special qualities and local distinctiveness of the area contrary to Policy EN 2 and paragraphs 172 and 173 of the NPPF.

In addition, the application has not been supported by an ecological impact survey. In the absence of an ecological survey, the Council cannot determine whether any significant harm to biodiversity would result from the development; whether any harmful impacts, if identified, can be adequately mitigated and what measures are appropriate to conserve and enhance biodiversity in this location. The proposal is therefore contrary to Policy EN 9 and paragraphs 174, 175, 176 and 177 of the NPPF.

Further the proposal would be detrimental to highway safety by virtue of the failure to adequately provide for pedestrians/people with disabilities and the failure to provide adequate visibility splays at the junction of the access with the County highway (A149) which would cause danger and inconvenience to users of the adjoining public highway contrary to Policy CT 5 of the North Norfolk Core Strategy.

REFUSE for the following reasons:

- 1) The site lies within an area designated as Undeveloped Coast. It is considered that the proposed development does not require a coastal location and would therefore be detrimental to the distinctive open coastal character of the designated Undeveloped Coast, contrary to Policy EN 3 of the adopted Core Strategy and Paragraph 170 of the NPPF.
- 2) The development site is isolated from the main settlement of Stiffkey and from the campsite and surrounding buildings on Greenway. The development and access would be visible on the rise of land from the coast path and the domestication of the site

through the conversion of the buildings to holiday accommodation and thereby introducing domestic features into the landscape such as cars, people and light will have an adverse impact on the special qualities of the AONB, namely that of tranquillity, sense of remoteness and wildness and the strong and distinctive links between land and sea and will have significant impacts with respect to light pollution. The development will not protect or converse the distinct features of the local landscape character or the AONB and would therefore not comply with Policies EN 1 and EN 2 of the Core Strategy and Paragraph 172 of the NPPF.

- 3) The site is within the Rolling Open Farmland (ROF) landscape character type, as defined in the North Norfolk Landscape Character Assessment document (LCA) 2018. However, the site is heavily influenced by and influences on the adjacent Open Coastal Marshes (OCM) landscape character type to the north. Many of the valued features and qualities of the Rolling Open Farmland and Open Coastal Marshes landscape types are considered to positively contribute to the key qualities of the AONB. Of significant concern for the OCM landscape type is the potential for changes in the neighbouring areas inland to affect views and character attributes in the OCM. Key to retaining the character of the ROF Type is conserving the openness, tranquillity and rurality of the landscape which has limited capacity to visually contain development. Furthermore, the LCA landscape guidelines for the OCM type require the protection and enhancement of its wild and remote character through the careful consideration of development in adjacent inland landscape types (including the consideration of lighting at night). The development will significantly detract from the valued features and qualities of both the ROF and OCM landscape character types and is not therefore compliant with Policy EN 2 of the Core Strategy and Paragraph 172 of the NPPF.
- 4) Policy EN 9 requires that all development proposals should protect the biodiversity value of land and buildings and minimise fragmentation of habitats; maximise opportunities for restoration, enhancement and connection of natural habitats. The application is not supported by an ecological impact assessment and therefore insufficient information has been submitted to demonstrate compliance with Policy EN 9 of the North Norfolk Core Strategy and paragraphs 174, 175, 176 and 177 of the National Planning Policy Framework.
- 5) The proposed development does not adequately provide for pedestrians/people with disabilities (those confined to a wheelchair or others with mobility difficulties contrary to Policy CT 5 of the North Norfolk Core Strategy.
- 6) Inadequate visibility splays are provided at the junction of the access with the County highway (A149) and this would cause danger and inconvenience to users of the adjoining public highway contrary to Policy CT 5 of the North Norfolk Core Strategy.
- 7) As far as can be determined from the submitted plans, the applicant does not appear to control sufficient land to provide adequate visibility at the site access. The proposed development would therefore be detrimental to highway safety contrary to Policy CT 5 of the North Norfolk Core Strategy.

Final wording of reasons and any others considered necessary to be delegated to the Head of Planning: