

Matter 5: Places & Housing Sites

NORTH NORFOLK LOCAL PLAN

PROPOSED SUBMISSION VERSION

Regulation 19 - January 2022

ADDITIONAL EXAMINATION STATEMENT

Policy W07/1 Land Adjacent Holkham Road

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Introduction

I respond to the additional submission made by the promoter of this site as a chartered town planner, qualified urban designer and former CABI Enabler responsible for conducting many Design Reviews of proposed schemes.

Policy Context

The most relevant policies against which to appraise the site promoter's additional submission include:

The **NPPF** which states: *'Great weight should be given to conserving and enhancing landscape and scenic beauty in ...Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues.'* (Para. 182).

Emerging **Local Plan Policy ENV 2** (Protection & Enhancement of Landscape & Settlement Character) which states that development proposals should demonstrate that their location, scale, design and materials will protect, conserve and enhance the defining qualities and local distinctiveness of the Landscape Character Type including its key characteristics, valued features and qualities and visually sensitive skylines, hillsides, seascapes and valley sides.

Emerging **Local Plan Policy ENV 3** (Heritage & Undeveloped Coast) which states that in the designated Heritage Coast and Undeveloped Coast development will only be permitted where it can be demonstrated to require a coastal location and which will not be significantly detrimental to the open coastal character.

Response to Site Promoter's Additional Submission

In an attempt to comply with emerging Policies ENV2 and ENV3, the site promoter's Landscape and Visual Impact Assessment (LVIA) correctly refers to the Landscape Character Type which applies to this site: Wells-Next-The-Sea Rolling Open Farmland (ROF7). The LVIA states:

'3.2.11 The setting of Wells is potentially sensitive to change. It is noted that "The town and harbour has a distinctive, dramatic and undeveloped coastal landscape setting," while the inherent sensitivities of the area include "The highly distinctive landscape setting of Wells, which is sited within a very undeveloped and rural coastal location, including views from approach roads and the surrounding countryside."

3.2.12 The site can be seen together with the town in views from the north from The Bank and Beech Road, and from certain points on the Norfolk Coast Path. It can be said that the site forms part of the setting of the town in these views.

3.2.14 New houses, nonetheless, have the potential to be prominent based on their elevated position.'

In addition, one of the key landscape characteristics of Wells noted in the Landscape Character Area Assessment SPD, 2021 is: 'Mature tree cover within the urban area is also an important component in settlement character.' The Inspector will have noted this characteristic from the views mentioned in Para 3.2.12 above.

The LVIA concludes that the proposed development would have an adverse impact on the landscape.

The additional submission by the promoter of the site (particularly the site layouts showing 51 and 47 units and the Sketch Landscape Strategy) serves to demonstrate that an allocation of approximately 50 dwellings on Land Adjacent Holkham Road (W07/1) with the current policy criteria is entirely inappropriate within the Norfolk Coast AONB/ National Landscape and the Wells-Next-The-Sea Rolling Open Farmland in particular.

The proposed parallel culs de sac layout seeks to replicate the narrow, enclosed streets of Wells which lead up from the coast with which they had a close relationship. The short lengths of cul de sac with built form separated by parking and turning heads do not lead up from the coast. The large dwellings with garages and parking spaces which line the spine road at the highest point of the site about well-spaced houses set in large, well landscaped gardens and are inappropriate in this context. The introduction of bungalows to overcome issues of impact and monotony is certainly not characteristic of historic Wells and is similarly inappropriate.

The proposed development would present a suburban appearance (as confirmed by the District Council's Conservation Officer). The local planning authority's pre-application response refers to an 'overly regimented arrangement' which 'created the risk that such a development would appear unduly suburban rather than reflecting the informality and rurality of the surroundings.'

There would be inadequate space for significant planting between buildings, driveways, footpath and turning heads and the submitted 'Sketch Landscape Strategy' would be wholly inadequate in mitigating the impact of development in this location. This is confirmed by the local planning authority's responses to the pre-application enquiry which states:

'Noting that trees make an important contribution to the character and quality of a site, any new streets should be tree-lined and trees should be integrated into the design. Some areas of concern can be raised now around shading and liveability; Plots 11, 10 (Elm), Plot 1 (Sycamore, Holly, Elm) possibly Plots 7& 8, (Hawthorn, Ash) retaining larger trees on site including Sycamore trees is important and may require more formal protection.'

"More trees would be encouraged where possible in the core part of the development.'

'The aim should not be to screen out the scheme, but to assimilate it into the agricultural field pattern landscape, so that it does not appear as a jarring development extending out from the town. There may be opportunities to reinforce field boundaries and add tree planting beyond the red line of the site within the wider landholding of the applicant to assist with this.' [Of course, this is not appropriate as it would not form part of a planning application or a Local Plan allocation and sufficient land must be available within the site to accommodate sufficient landscape mitigation].

The initial pre-application layout for 51 units shows the access road from Mill Road following the alignment of that included by the District Council as a proposed Modification to the Local Plan. The pre-application response from the local planning authority refers to this access road as 'a dominant main access road, the straightness of which limited the options for creating layering and visual interest.' The proposed access road shown on the revised layout prepared at the request of the local planning authority to improve the visual appearance from

Mill Road is not aligned with the proposed Modification to the site allocation. As currently proposed, the proposed Modification to the site does not appear to accord with the local planning authority's own advice to the applicant. In addition, the road crosses a Local Green Space as proposed in the Neighbourhood Plan.

The local planning authority's response to the principle of development on this site notes that development does not comply with the adopted local plan and that the emerging local plan can be given 'only very limited weight'. Nevertheless, the local planning authority is obliged to respond to a pre-application enquiry - in this case in the light of the absence of a 5-year housing land supply. The Local Plan tests are quite different. The principle of housing development on this site and, if acceptable in principle, the appropriate criteria necessary to ensure an acceptable development should be plan-led through the emerging Local Plan.

Conclusion

Given the North Norfolk Local Plan and Wells-next-the-Sea Neighbourhood Plan are evolving in parallel, Land Adjacent Holkham Road (W07/1) is referred to in the Neighbourhood Plan (but not allocated).

Wells Town Council object to this allocation. The Town Council have proposed an alternative site of similar capacity for affordable housing within the Neighbourhood Plan.

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 the landscape and scenic beauty of the Norfolk Coast Area of Outstanding Natural Beauty.

Further, the site promoter's additional submission confirms that the proposed allocation as currently framed would not comply with emerging Policy ENV2 (Protection & Enhancement of Landscape & Settlement Character) in protecting, conserving and enhancing the defining qualities and local distinctiveness of the Landscape Character Type or Policy ENV 3 (Heritage & Undeveloped Coast) in demonstrating the proposed development would not be significantly detrimental to the open coastal character. The site promoter's additional submission confirms the prominently located development proposals designed against the current policy wording would result in an adverse impact on the landscape.

The additional submission by the site promoter (particularly the site layouts illustrating 51 and 47 units and the Sketch Landscape Strategy) serves to demonstrate that an allocation for approximately 50 dwellings on Land Adjacent Holkham Road (W07/1) based on the current policy criteria is not justified as an appropriate strategy, taking into account the reasonable alternatives, or consistent with national policy.

The Inspector may conclude that a poorly located or designed scheme cannot be made acceptable through the inclusion of a high quality landscaping scheme and reject this proposed allocation. However, if the Inspector concludes that part or all of the site is suitable

for some housing development, the layouts submitted based on current Policy W07/1 and the local planning authority's own pre-application comments regarding layout, landscape and access confirm that important amendments are required to the Policy. The site capacity must be reduced (potentially even setting a maximum in this location) to allow scope for the essential additional landscape mitigation within the site and to abandon the suburban layout for a landscape-led development allowing the transition from built form to the surrounding countryside and the integrating of the proposals into the designated landscape.

I set out Proposed Modifications to Policy W07/1 criteria in my original submission.