

**From:** Cllr. Victoria Holliday  
**Sent:** 04 January 2024 18:43  
**To:** Annette Feeney  
**Subject:** Final written representation for Local Plan hearing

Dear Annette

Here is my final written rep for the Hearing, ref Blakeney site allocation.

Thanks v much indeed.

Vbw

Inspectors matters 5.10.3

*Does the proposal constitute a major development in the AONB and does it satisfy the test set out in NPPF 177?*

For the avoidance of doubt, I assume the test refers to paragraph 177 in the relevant previous version of the Planning Policy Framework, which states 'When considering applications for development within National Parks, the Broads and AONBs, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated the development is in the public interest. Consideration of such applications should include an assessment of

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

I will here focus on item c in paragraph 177.

Major development is classified as a residential development if 10 or more dwellings or a development of more than 0.5 hectare where the number of dwellings is unknown. The proposed Blakeney allocation is approximately 30 dwellings.

The proposed site in Blakeney is in close proximity to highly designated national and international habitat sites, being approximately 150m to the north east of the WIVETON Downs SSSI, and approximately 550m to the south of the North Norfolk Coast SAC/SPA/Ramsar/SSSI/NNR.

For the avoidance of doubt, I will continue to refer to the Norfolk Coast Area of Outstanding Natural Beauty rather than the new term of Norfolk Coast National Landscape as the former is the term used by the new Framework, and I will use the assessment of AONB well-being as a proxy for the well-being of other designated habitat sites.

Conserving, protecting and enhancing the Norfolk AONB is essential. In the Norfolk Coast AONB Management Plan (updated 2022) of the seven Key Qualities of Natural Beauty, as assessed in 2022, 5 are rated as amber (ie some grounds for concern) and only 2 as green (ie the key quality is being conserved and enhanced).

The Key Qualities rated as amber are:

- The dynamic character and geomorphology of the coast;
- Strong and distinctive links between land and sea;
- Diversity and integrity of landscape sea scape and settlement character;
- Exceptionally important, varied and distinctive biodiversity; and
- Sense of remoteness, tranquillity and wildness.

It could be argued that 4 out of these 5 Key Qualities are within developmental control; the dynamic character and geomorphology of the coast being more affected by climate change than development.

The Key Qualities rated as green are

- Nationally and internationally important geology; and
- Richness of archaeological heritage and historic environment.

It could be argued that these are less affected by development.

Two of the Key Qualities have dropped from green to amber during the period 2014-22

- The dynamic character and geomorphology of the coast; and
- Exceptionally important, varied and distinctive biodiversity, based on locally distinctive habitats.

Of these two, biodiversity is within developmental control.

The explanation for the down rating of Key Qualities of Natural Beauty is given as: 'Significant developments have adversely affected the character of the coast... These have impact on the setting of AONB as well as increasing recreational pressure. Insensitive changes to building and settlement character from building alterations/ extensions and security lighting are a concern.

Some of the most high profile, characteristic bird species are affected by pressure from coastal visitors. Turtle dove populations are decreased.

Assessment of the ecological status of the area's rivers under the Water Framework Directive suggests that 17% of their lengths are in poor condition and over 80% in moderate condition.

The population in and close to the AONB has risen significantly. Visitor numbers have increased significantly since designation and have remained high.

Archaeological damage has occurred from ploughing and there has been some loss of historic landscape patterns such as field boundaries. Coastal and offshore development has affected the setting of some coastal heritage assets.'

Potential Environmental effects of development include:

- Water resources and effects on natural features dependent on these;
- Sewage and water treatment;
- Transport and traffic;
- Light pollution; and
- The tranquillity of the area.

These have the potential to adversely affect habitats.

Depending on the ability and resources to influence and manage recreational activities, increase in housing development could have impacts on habitats through:

- Pressure in sensitive habitats and species, especially in coastal locations, through inadvertent damage and disturbance. There is already known pressure on sensitive habitats and species in some locations eg dunes and beach nesting birds, impacts on ground nesting, feeding and roosting birds from people walking dogs;
- Increased traffic levels and associated effects eg erosion of tranquillity, pressure for signage and infrastructure, increased air pollution and carbon emissions;
- Increasing noise from some recreational activities eg aircraft, jet skis; and
- Increased litter, dog fouling.

The Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy March 2021 suggests the key recreational disturbance identified for North Norfolk is from walking, and that Blakeney is one of the locations for disturbance impacts. I understand the provision of 0.08 hectares of public open space is proposed on this site. This is less than 0.2 acre and will provide little mitigation for habitat disturbance by walkers.

This above analysis demonstrates the detrimental effect of development in Blakeney on the environment, the landscape and any recreational opportunities.

**Victoria Holliday**