

Landscape Character Assessment

Summary of Responses to Public Consultation
19/01/09 – 02/03/09

Section of Document	Consultee / Company / Organisation	Nature of Response	Summary of Response	Summarised NNDC Response
Whole document	Blakeney Parish Council, EERA, Go-East, Broadland District Council, EEDA, CPRE, NCC (landscape), Environment Agency	Support / observations	No specific amendments, a good and thorough document that gives a comprehensive assessment of the existing landscape. The document is in general conformity with the adopted East of England Plan. Format and approach appear to be appropriate. Document is well structured and organised with concise and informative text. Maps, pictures and figures are particularly helpful. Fits reasonably well with other published assessments.	Support & comments welcomed and noted.
Whole document	Gresham parish Council	Observations	North Norfolk already has several wind turbines and the nature of the county will be spoiled by the erection of further turbines. The weather is not suitable and could be detrimental to the efficient running of the turbines. The sea itself may be a better power to harness. Asks that further research is carried out.	Comments noted, however it is not the role of the Local Authority to carry out research into the effectiveness of efficiencies of renewable energy technologies.
Whole document	Plumstead Parish Council	Object	Objects to the suggestion that wind turbines may be absorbed into the landscape of North Norfolk. The document should not contain any suggestion that on-shore wind turbines will be tolerated.	The LCA seeks to identify and characterise the elements and features of the landscape that define it. The LCA then goes on to make judgements as to what will enhance or erode the character based on its sensitivity and condition. The LCA does not intend to make overarching statements about the ability of the entire District to accommodate Wind Turbines.

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Whole document	Mr Rose, Wells Area Partnership, Friends of the Earth UK, Renewables East	Object	<p>Too much emphasis given to preserving views and landscapes and fails to embrace the changes necessary to encourage greater sustainability. A more sustainable landscape should include views that include wind turbines. Turbines along with biomass and woodland need to be accommodated. This should also extend to the consideration of off-shore turbines. This draft LCA seriously undermines the policies in the North Norfolk Core Strategy relating to renewables and the need to deal with climate change because it effectively assesses most of the district as inappropriate for renewable development. Also contradicts national guidance. Results published in the Sustainability Appraisal reflect this. Several specific text changes suggested throughout the document in relation to wind turbines.</p>	<p>Comments noted. LCA is widely employed as a tool to help guide decisions about the allocation and management of land for different types of development. It can make an important contribution to finding solutions that allow essential development to take place while at the same time helping maintain the diverse character and valued qualities of the countryside. The NNDC LCA does not include a landscape capacity study as it is considered that these are more relevant to specific proposed changes (such as wind farms) rather than generalised development of the landscape.</p> <p>The LCA is not aimed at resisting change in the landscape; this is detailed and explained in the 'introduction' section of the document.</p> <p>NNDC recognise that conflicts will arise based on the content of the LCA. Text changes have been made to the 'Introduction' section of the document to explain how NNDC will manage these conflicts within the planning system. A further paragraph on 'wind turbines' has also been included setting out the Government's policies on Renewable Energy and Sustainable Development.</p> <p>Some text changes have not been made because the existing text suggests alternative and more positive locations for wind turbines, as well as those areas that would be less suitable.</p>

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Whole document	NCC (Landscape)	Support with conditions	Pleased that descriptions of geological and ecological character have been included along with landscape character and suggests that historical character could also be included within a future review once the information on the Counties Historic Landscape Characterisation has been published.	Comments welcomed and noted. It is anticipated that the LCA will continue to be revised and updated in the future. The Historic Landscape Characterisation could be included in future revisions.
Whole document	Norfolk Geodiversity Partnership (NGP)(RIGS) & Geological Society of Norfolk (GSN)	Observations	This format is much easier to follow and use than previously seen. It deals with geodiversity in a consistent way using the headings of Geological Character for each Landscape Character Type. There are still some missing Geological Character descriptions for each landscape type. Also suspects that we have not yet identified all the geological positive/negative factors which impact on the local landscapes.	Comments welcomed and noted. It is anticipated that the LCA will continue to be revised and updated in the future. Additional threats and opportunities for Geological character could be included in future revisions.
Whole document	BPA Limited	Observations	BPA require to be consulted on all developments with the Zone of Interest of the gas and condensate pipelines in accordance with Statute.	Applications will be assessed and consulted on according to statutory guidelines.

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Whole document	Environment Agency	Observations	<p>Encouraged that a diverse range of landscape characters and their associated ecological characters have been identified. Fully support that a number of factors to enhance/ actively contribute/ maintain the ecological character of the District have been identified. Also support reference to the importance of 'greenlinks' or 'bluelinks' in some chapters and the opportunity to develop connections which will enable biodiversity to migrate through the area. The concept of open space being a multi-functional part of the landscape appears to be well reflected throughout the SPD. The use of Sustainable Drainage (SuDS) can provide many benefits and can be designed to form part of the hard and soft landscaped areas. It may be appropriate to reference policy EN10 in paragraph 2.1.4. It would be helpful if the subsection titles were included on each page to improve the accessibility of the document.</p>	<p>Comments welcomed and noted.</p> <p>Para 2.1.4. amended to include Policy EN10.</p> <p>Unfortunately third party software restrictions prevent the labelling of the chapters in the heading, however the colour coding and chapter numbers should help with identifying which chapter the user is in.</p>
Various sections throughout document	Norfolk Homes	Observations	<p>Several suggestions made for replacement wording / definitions to be included for certain terms / provision of details of criteria used to make judgements.</p>	<p>Some text changes and additional definitions incorporated.</p>
Various sections throughout document	CPRE	Observations	<p>Fulmodeston is incorrectly spelt 'Fulmodestone' in several places. The additional 'e' at the end should be removed.</p>	<p>Comments noted. Changes made.</p>
Figure 1.1	CPRE	Observations	<p>The circle and text within Figure 1.1 are very cramped and not easy to read albeit this is a very useful diagram. Should be expanded.</p>	<p>Comments noted. Figure 1.1. to be made clearer prior to final document production.</p>

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Para. 1.2.5	CPRE	Observations	In the text opening paragraph 1.2.5 (third line) it might be useful to point out that there is such a strong overlay of the influence of man (cultural/social) on the 'natural' that apart from salt marshes and parts of the coastline the interaction is such that all landscapes are semi-natural.	Para 1.2.5. does not seek to define if a landscape is 'natural' or 'semi-natural' merely what components a landscape is made up of. It would be inappropriate in this section of the document to make assessment of the strength of influences on the landscape, as the description is only there to explain what Landscape Character Assessment is.
Para 2.1.2	Friends of the Earth UK	Observations	Best practice for LCAs would include recognition of the impact of climate change on the landscape.	Comments noted. This LCA includes some reference to the impact of climate change, such as the change expected in the coastline; however it doesn't currently have a detailed account of the potential effects of climate change on landscape character. It is expected that document will be updated in the future and these considerations could be included in future editions when further research has been undertaken in this field of study.
Para 2.1.5	(NGP)(RIGS) & (GSN)	Support with conditions	Welcomes inclusion of Geological Context in the introductory section. Suggests text for a further paragraph between the current 2.1.15 and 2.1.16.	Comments noted. Text inserted.
Para. 2.2.6	Norfolk Homes	Observations	This paragraph indicates that sensitivity is analysed at both the individual feature level and the whole landscape level. No reference in the landscape type chapters that address the sensitivity of the landscape as a whole. There is a section in each chapter that evaluates landscape condition and strength of character but not landscape sensitivity.	The issue of sensitivity at the whole landscape level can be found throughout the text of the document. Also see <i>para</i> 2.2.8. for further analysis of sensitivity with regard to the whole landscape.

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Para's. 2.2.7 & 2.2.8	Norfolk Homes	Observations	This is waffle and does not assist the document in any way. Suggest that paragraphs be deleted.	Opinion noted.
Paras 2.2.9 & 2.2.10	Norfolk Homes	Observations	No detail is given of the criteria used to assesses what makes condition good fair or bad. The process is therefore not transparent and it is not possible to test whether the judgements are valid at the site specific level. Same criticism of sensitivity.	Comments noted. Text relating to landscape condition inserted between 2.2.8 and 2.2.9
Chapter 4 Rolling Open Farmland	Capita Lovejoy	Observations	<p>Disagrees with several statements and conclusions made in the section about the landscape around Fakenham and suggests amendments to this.</p> <p>In particular the assessment of the condition and sensitivity of the 'Rolling Open Farmland' landscape (to the north of Fakenham) should be amended to distinguish between those areas that have been identified as being more eroded (i.e. around Fakenham) and those areas that are more characterful (i.e. around villages or isolated farmsteads). Consider that the assessment that 'significant numbers of new properties either sited within or outside existing settlements' would erode landscape character does not apply to the landscape to the north of Fakenham where there is significant capacity within the bypass to accommodate additional dwellings.</p> <p>Object to the specific reference in the LCA to the promotion of woodland to the north of the by-pass as a means of landscape mitigation.</p>	<p>Comments noted. The characterisation, judgement making and methodology employed during the development of this LCA is explained in detail in the 'introduction' chapters of the document. These explain the degrees of variation for defining the condition of landscape (additional text has been added to clarify this matter), and therefore go some way in explaining the judgement criteria. The issue of Green Infrastructure and landscape mitigation is likely to be dealt with during the allocation of the site specific proposals for the LDF process. The LCA does not negate the need for individual landscape character and visual assessments to be undertaken for specific developments, and it is during the planning process that the issues raised can be addressed.</p>

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Para's. 4.1.3 & 5.2.3	Kettlestone Parish Council	Observations	Perceived contradiction between these paragraphs with regard to wind turbines in this landscape (Kettlestone).	Comments noted. The NNDC LCA does not include a landscape capacity study as it is considered that these are more relevant to specific proposed changes (such as wind farms) rather than generalised development of the landscape.
Para. 4.0.13	Kettlestone Parish Council	Observations	No mention of landscape improvement in Kettlestone concerning repairing & replanting of hedgerows or fairly considerable return to meadowland from intensive arable use.	The character of Kettlestone can be assessed when the next revision of the LCA is undertaken.
Para. 4.3.4	Kettlestone Parish Council	Observations	Light pollution from Fakenham. No reference to how badly Kettlestone is affected by this or for that matter all those settlements in chapter 8.9 (SV9).	This issue can be assessed when the next revision of the LCA is undertaken.
Para's. 4.4 (ROF4) & 5.5	Breckland District Council	Observations	Highlights some differences between Breckland's assessment of this Area which extends across the Districts and this LCA.	Comments noted. Text changes made to reference the difference between the two LCAs.
Para. 6.1.1	The Open Spaces Society	Observations	Here it should be noted that a certain amount of hedgerow and woodland restoration/replacement has begun to be undertaken in recent years.	Some text changes have been made.
Para. 6.1.3	The Open Spaces Society	Object	This paragraph contains an error inasmuch as the road from North Walsham to Bacton is NOT heavily used to service the Gas Terminal. The official route to service the Gas Terminal runs via Stalham. The road from North Walsham to Bacton has in recent years been downgraded from a 'B' class road to a 'C' class road and the road retains a rural character which complements the area's landscape.	References to the Gas Terminal removed.

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Para. 6.1.4	The Open Spaces Society	Objects	Strongly disagrees with the suggestion that any parts of LP1 could accommodate some disturbance in the form of wind turbines on the basis that they would be seen in the context of the Gas Terminal. Wind turbine development located within the northern part of LP1 would undoubtedly have a significant negative impact upon this scene.	Comments noted, however no changes made. A section has been included in the 'Introduction' section of the document on Government policies on renewable energy as contained in PPS22 explain how NNDC will manage conflicts that may arise between LCA conclusions and the social and economic objectives of the Core Strategy.
Para 6.1.6	The Open Spaces Society	Observations	It is correctly recognised that the coastal area has a significant influence over adjoining sensitive coastal areas although it is not clear exactly what comprises the coastal area of LP1. It should be recognised that LP1 is adjacent to and influences part of the AONB. It is correctly recognised that prominent developments within the coastal area would have significant detrimental effects on a wide area.	Comments noted. Text changes made.
Para. 6.3 - Area (LP3), Tables 6.1 Low Plains Farmland & 9.1 Settled Fen	Mrs A Turpin	Observations	Suggests that the A1062 should be included in the 'key characteristics' of these Areas.	The A1062 does take a considerable proportion of the traffic associated with the south eastern part of the District, although it does not have as many of the improvements associated with the other main roads mentioned. Due to the busy nature of the road, it can be incorporated into the text as a 'main road'. Text changes made to <i>para</i> 9.0.9. to accommodate suggestions made and to LP3 to reflect the status of the A1062.

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Para. 8.5 (SV5)	The Open Spaces Society	Observations	Reference is made to “former common land areas at Southrepps (Lower Street) and Spa Common as well as Bradfield”. Question the appropriateness of the qualification “former” bearing in mind that existing registered common land exists at Southrepps Lower Street and at Bradfield.	The text is referring to the settlement pattern and not the land use therefore although common land is still present, some areas have seen development and been built upon. No changes made to text.
Para. 8.8	Gresham Parish Council	Observations	Considers the issues mentioned within this paragraph do not appear to be taken into account when planning applications are presented. Infill is happening where outline planning permission was granted prior to Gresham becoming 'Countryside'. Asks that the infill issue and gentrification is seriously discussed in order to retain what we have left of a quiet and undeveloped backwater, with it's important ecological features of North Norfolk.	Comments noted. Gresham no longer has a settlement boundary and therefore infill development is restricted.
Para. 8.9	Kettlestone Parish Council	Observations	Disappointing lack of reference to Kettlestone per se.	Comments noted. The character of Kettlestone can be assessed when the next revision of the LCA is undertaken.
Chapter 11 Coastal Towns & Villages	(NGP)(RIGS) & (GSN)	Observations	Suggests additional text in relation to geological character. Also suggests that issues of sea defences verses natural erosion should be addressed here.	Comments noted. Text inserted.
Chapter 11 Coastal Towns & Villages	Sheringham Town Council	Observations	Suggests removing some sites (which are non-preferred) from the Site Specific Proposals document because if developed it would conflict with the aims of the LCA.	Comments noted. A section has been included in the 'Introduction' section of the document to explain how NNDC will manage conflicts that may arise between LCA conclusions and the social and economic objectives of the Core Strategy.

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Para 11.0.1	(NGP)(RIGS) & (GSN)	Observations	There is a discrepancy between the geographical extent of this Type in the text and the extent shown on the map. The written description in 11.0.1 describes the Type reaching Sheringham in the west. The map shows it extending as far as Weybourne. Assuming Weybourne is the western endpoint. Amend as above. '... near the western edge of Weybourne without ...'	Text changed.
Para 11.0.4	(NGP)(RIGS) & (GSN)	Observations	Suggested amendment: '... seaward side of the Cromer Ridge. The soil is derived from the glacial sands gravels and clays which are highly contorted and are exposed in the eroding coastal cliffs which are a major ...' (It is safest not to put a specific manner of formation on the Cromer ridge as there is ongoing discussion on precise use of terms.)	Text changed.
Para 11.0.8	(NGP)(RIGS) & (GSN)	Observations	Add to text: The cliffs between Weybourne and Mundesley are of international importance for their geology.	Text changed.
Para's. 11.1.4 – 11.1.4	Mr C Small	Support	Agrees with these paragraphs. Suggests that there should be no further development within or adjacent to Weybourne.	Comments noted. Planning applications will be assessed according to the policies set out in the Core Strategy, including policy EN2 Protection of the Landscape and Settlement Character. A section has been included in the 'Introduction' section of the document to explain how NNDC will manage conflicts that may arise between LCA conclusions and the social and economic objectives of the Core Strategy.

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Para. 11.2 (CTV2)	Mr C Boden Smith, Ms C Boden Smith, Mrs C Ormrod	Observations	Objects to new development in the AONB at land to the rear of Sutherland Court Gardens / House.	Comments noted. The issues surrounding the Site Specific Allocations are being dealt with in a separate document. A section has been included in the 'Introduction' section of the document to explain how NNDC will manage conflicts that may arise between LCA conclusions and the social and economic objectives of the Core Strategy.
Chapters 12 WP, 13 RHA, 14 DCM, 15 OCM	(NGP)(RIGS) & (GSN)	Observations	Suggests additional text in relation to geological character.	Text inserted.
Para. 12.6 (WP6)	The Open Spaces Society	Observations	Reference is made to the B1150 road which runs through the area. The stretch of road is un-modernised in alignment and historic and contributes considerably to the surrounding landscape character. Excessive road signage or road development schemes would be harmful to the character of this landscape.	Comments noted.

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Para. 13.0.1	(NGP)(RIGS) & (GSN)	Observations	There is a discrepancy between the described extent of this Type and the extent shown on the map. The written description in 13.0.1 and 13.0.3 describes the Type extending to Sheringham. The map shows it ending at Weybourne. In the following comments I am assuming Weybourne is the eastern endpoint. 13.0.1 - Amend to something like: This type area covers the raised hinterland stretching from Blakeney to Weybourne. It largely consists of glacial sands and gravels and includes sections of the Cromer Ridge and the Blakeney Esker. The principal characteristic ... Add to the Key Characteristics: Many small historic sand and gravel pits. Some larger extraction pits still active.	Text inserted.
Para. 13.0.3	(NGP)(RIGS) & (GSN)	Observations	Suggested amendment: To the east this landscape Type ends in the soft chalk and glacial sediment cliffs near Weybourne. To the west the rolling hills are distanced from the sea by adjoining marshland.	Text inserted.
Para. 13.0.12	(NGP)(RIGS) & (GSN)	Observations	Suggested amendment: Heathland is present in significant quantities distributed along the 'sandy gravel Cromer Ridge and the Blakeney Esker'. Most ... (It is safest not to put a specific name the manner of formation of the various glacial formations as there is ongoing discussion on precise use of terms.)	Text inserted.
Para. 13.0.17	(NGP)(RIGS) & (GSN)	Observations	Add to the list b) Factors which enhance ... <ul style="list-style-type: none"> • Retention of small sand and gravel pits which add to the historic character and conserve geodiversity. 	Text inserted.

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Para. 13.1.3	(NGP)(RIGS) & (GSN)	Observations	Add to the existing text: However retention of some portion of the geological exposures on restoration of the gravel pit could have increased geological interest and provided more habitat diversity.	Comments noted.
Para. 13.2 (RHA2)	(NGP)(RIGS) & (GSN)	Observations	Add another paragraph (in ISSUES section) along the lines of: Restoration of commercial extraction pits provides the opportunity to increase geodiversity by retention of small geological faces exposed during extraction activities.	Text inserted.
Table 13.2	Wells Area Partnership	Observations	Visibility of the aurora borealis is more a factor of solar activity and northerness [sic] of the location (rather than a dark landscape) I have personally seen it from the centre of Wells as well as Cley and the edge of the saltmarshes between. Lighting within urban areas is the major problem with night sky visibility and for the casual observer only a short distance from a street light is needed for a decent view.	The reference to the Aurora Borealis has been removed; however the characterisation of the landscape as a dark landscape is retained.
Para 14.1.6	Wells Town Council	Object	The conflicts mentioned must not make life difficult for residents by forcing tourists to park cars in places that cause traffic problems. The established recreational use of the area should be recognised. Recognition should be given to the differences between undrained Marsh between Wells and Stiffkey and the drained Marsh between Wells and Holkham. Existing uses of the drained marsh can be continued and in some cases expanded with good planning.	Comments noted. Additional text inserted at Section 2.1.1. to further clarify the purpose and usage of the LCA.

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Para. 15.1 (OCM1)	Wells Harbour Commissioners	Object	<p>Does not support a number of aspects of the comments relating to Wells-next-the-Sea particularly in relation to the working port / harbour area. It does not demonstrate an understanding of the social economic and environmental use or dynamics of the area or its history. It is suggested that this section should be rewritten.</p>	<p>Comments noted. Some text changes made. The LCA recognises that Wells harbour is a working port at the very start of Chapter 15.1. The Area description acknowledges that the Area has both remoter marsh land areas as well as more 'artificial' port areas. The LCA is not aimed at resisting change in the landscape; this is detailed and explained in the 'introduction' section of the document.</p> <p>The characterisation, judgement making and methodology employed during the development of this LCA is explained in detail in the 'introduction' chapters of the document. The LCA is highlighting the issue relating to sensitivity in the existing landscape.</p> <p>NNDC recognise that conflicts will arise based on the content of the LCA. Text changes have been made to the 'Introduction' section of the document to explain how NNDC will manage these conflicts within the planning system. The document is to be used in conjunction with other Development Plan Documents and Policies, and with regard to other material considerations within the planning regime.</p> <p>The LCA does not negate the need for individual landscape character and visual assessments to be undertaken for specific developments, and it is during the planning process that the issues raised can be addressed.</p>

Section of Document	Consultee / Company / Organisation	Nature of Response	Summary of Response	Summarised NNDCC Response
LCA Sustainability Appraisal Document	(NGP)(RIGS) & (GSN)	Support with conditions	SA has arrived at the correct option for the LCA SPD in recommending production of the new Landscape Character Assessment SPD. However it is not possible to check whether geodiversity has been considered in the SA process without returning to the SA Scoping Report itself. Suggests amended wording for ENV1.	Comments noted.