

Natural England advice note in response to the Persimmon Hearing Statements



Matter 10 Hearing statement. In relation to question 10.14

Much of the wording of the policy is drawn directly from the wording about development in NPPF in relation to Heritage Coasts, which in turn reflects the national-level significance of such definitions.

Natural England is satisfied with the first paragraph of Policy N7PU as seen below:

‘New development within the vicinity of the Heritage Coast must conserve, protect and enhance the Heritage coast and its setting and take opportunities to encourage the public to enjoy and understand the area by improving public access and interpretation where possible. Developers should demonstrate that they have taken into consideration the features that contribute to the special character of the area and the importance of its conservation.’

However, Natural England does not agree with the additional text as supplied by Persimmon homes. The sentence in the retained paragraph above already adequately and appropriately covers the responsibilities of developers. Natural England considers that the additional text proposed by Persimmon should not be included.

Natural England suggests that the following additional wording to paragraph three of the policy would strengthen the meaning:

‘Inappropriate development includes that which affects views within or towards/from the Heritage Coast because a fundamental characteristic of a Heritage Coast is one which presents visually as undeveloped. Major development within the Heritage Coast is unlikely to be appropriate unless it is compatible with its special character.’

Natural England recommends removing the last clause of paragraph four about exceptional circumstances, as it could open debate about what constitutes ‘exceptional circumstances’ and goes beyond what is in NPPF, it is better to draw the line at development not being compatible with its special character.

The rest of the wording in this hearing statement matter 10 is a repeat of the text given in matter 15 which is considered below and conflates the expressed SoS view on impact on the existing HC with the specific impact on the proposed extension. It also conflates the high ridge that prevents views of the Marchon site from the existing HC with the very small change of slope in an open arable field to the west of the Wagon Way which would definitely not screen development from view.

In addition, the text also conflates impacts on the Coastal Path National Trail with impacts on the Heritage Coast extension. It is the whole of the Heritage Coast extension which has been deemed to qualify for national-level recognition by inclusion in the Heritage Coast, not just the Coastal path which is a separate feature of national level importance in the area and Persimmon Homes should not seek to minimise the degree of impact on the wider area of the proposed Heritage Coast extension by suggesting that only users of the Coastal Path should be taken into consideration.

The whole area is well used, not just the Coastal path, as evidenced by the many informal paths and desire lines visible throughout the area and it is the impacts of the proposed housing on the scenic quality of the whole open qualifying area of the proposed heritage coast extension that should be considered, not just the bit furthest away from the proposed development in the far west.

The image below shows the high ridge preventing views of Marchon in the background with the gentle slope in the arable field which is west of the wagon way in the foreground.



Natural England Comments in relation to Matter 15 Housing Allocations HS 15.5 Persimmon Homes

The Persimmon documentation is conflating impacts of the whole development on the existing Heritage Coast, with the specific and different impacts on the proposed Heritage Coast extension of extending the proposed development outside the land currently allocated for housing and into the area which has been found to qualify for inclusion in the Heritage Coast (HC). These two aspects should be disaggregated and treated separately.

It also significantly underplays the impacts of the western part of the proposed development, especially west of the Wagon Way, on the whole of the proposed extension of the Heritage Coast, concentrating solely on impacts on users of the Coastal Path National Trail which is a separate national-level designation from the Heritage Coast extension and right on the far edge of the area proposed for inclusion in the Heritage Coast extension.

The part of the application site west of the Wagon Way footpath is not part of the site allocated for housing, it is a greenfield site and the whole of the area west of (but including) the Wagon Way lies within the area assessed by Natural England and Copeland as qualifying for inclusion in an extended Heritage Coast, a national-level recognition for the country's most scenic coastlines.

Whilst the definition process is not yet fully complete, it is at a late stage with the technical assessments complete and a formal boundary produced, and the legal paperwork is underway. As such, the whole area of the proposed HC extension should be treated as being a valued landscape under NPPF paragraph 174 not just the line of the Coastal path. Proper consideration should be given to the likely impact of the proposed housing on the whole area which has been found to qualify for Heritage Coast definition (and not just the line of the Coast path) as it will be highly visible across most of the proposed Heritage Coast extension owing to the elevation of the land in the East and the totally open nature of the area proposed for definition, with the housing high above and overlooking the extension.

Persimmon suggests that the boundary of the proposed Heritage Coast is an arbitrary one as it is the only hard feature to follow in this open area. This is not the case. It follows the inland side of the wagon way not

because it is the only hard feature to follow, but because the Wagon Way is a key cultural heritage feature in its own right and important to understanding the context of the important mining and industrial cultural heritage of this stretch of coastline, from Birkham's quarry all the way to Whitehaven, therefore, warrants inclusion.

Natural England's boundary setting guidance sets out that in setting a boundary for a national-level designation, features of interest on the edge of the qualifying area are included within a designation/definition. Given its clear cultural heritage value, the Wagon Way should thus be included within the Heritage Coast extension.

The inclusion of the Wagon Way is necessary to understand the complex interrelationships of the industrial cultural heritage of this stretch of coastline (both designated and undesignated). If it were included within the middle of a housing development, its clear visual links to the wider Heritage Coast Area and the many cultural heritage features of the area (and the undoubted fine scenic views from the very well used footpath which runs along the Wagon Way towards the coast would be lost). Ideally, given the open sloping nature of the whole site, a much wider strip of land to the East of the Wagon Way would have been included in the proposed extension, to conserve its full context, but the fields to the East were already allocated in the Local Plan and allocated land on the margins of a definition is excluded.

Appreciation of the area of the proposed extension to the Heritage Coast is not as suggested by Persimmon 'primarily by users of the Coast path'. Heritage Coasts are also a valued brand in their own right with their own visitor base. The majority of the area of the proposed extension to the Heritage Coast is also an extremely well-used, valued local recreation facility on the edge of a large built-up area.

The proposed Heritage Coast extension area contains several very well used circular path routes covering the full width of the undeveloped coastal strip, which include the Wagon Way path, not just the Coastal Path, and which would all be used by visitors to the extended Heritage Coast. The importance of the

Wagon Way footpath to other significant recreation users should thus also be considered, not just users of the Coastal Path.

Contrary to what is said in paragraph 2.10, there is no clear ridge line splitting the development site, there is a clear ridge separating the existing Heritage Coast from the development site to the south, but west of the Wagon Way there is only a very small change of gradient in the open field which slopes gently down towards the sea to the west of the Wagon Way. It is not a clear break in the landscape and would not provide any screening across most of the proposed Heritage Coast extension. The description of a ridge significantly exaggerates the very slight steepening of a gentle incline in the middle of an open arable field. Effects on the Heritage Coast extension area of including land west of the Wagon Way cannot be judged, as suggested, to be slight and negative.

Persimmon suggests that only the rooflines of houses would be visible from the west of the area. The west of the area i.e. the alignment of the coastal path, is only a very small part of the qualifying area and does not reflect the importance of the whole area of the proposed HC extension or the impact of this development on it. Whilst 'in the west' on the Coastal Path, the ground floor of housing may be partially screened in places, across most of the proposed Heritage Coast extension, the development would be fully visible on high ground overlooking and dominating the whole sweep of this stretch of undeveloped coastline, particularly as by extending into the fields west of the Wagon Way the development would no longer be a straight extension of the existing urban edge, increasing its impact. Views of the development could not be screened from view in the open landscape of the proposed extension and certainly not to the roofline across most of the area which qualifies for Heritage Coast definition. Its impact is thus significantly underplayed.

The quote from the Secretary of State which Persimmon includes in relation to the St Bees Heritage Coast relates to the potential impact of the whole development on the existing Heritage Coast which is protected from view by the curve of the coast and the ridge topography. The ridge mentioned in that quote is not the same one that Persimmon suggest exists in the field to the west of the Wagon Way. Therefore, it does not relate to the area of land which has been found to qualify for inclusion in the HC West of the Wagon Way.

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