

# HOLME-NEXT-THE-SEA

## NEIGHBOURHOOD PLAN 2016-2036

### CONSULTATION STATEMENT



Submission Version

September 2019

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## **1 INTRODUCTION**

- 1.1.1 This document is the Consultation Statement for the Holme-next-the-Sea Neighbourhood Development Plan. It has been prepared by Holme-next-the-Sea Parish Council (the Qualifying Body) to accompany the submission version of the Holme-next-the-Sea Neighbourhood Plan (NDP) in accordance with The Neighbourhood Planning (General) Regulations 2012, Regulation (15).
- 1.1.2 The Neighbourhood Plan covers the time period 2016-2036. It does not deal with excluded development – ie. mineral extraction, waste development, nationally significant infrastructure or any other matters set out in section 61K of the Town and Country Planning Act 1990.
- 1.1.3 The Consultation Statement accompanies a ‘Basic Conditions Statement’ which explains how the Holme-next-the-Sea Neighbourhood Plan meets the requirements of paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (required by Regulation 15 (1)(d) and it includes a map showing the area to which the proposed Neighbourhood Plan relates (required by Regulation 15 (1)(a)).
- 1.1.4 Regulation 15(2) sets out the legal requirements for a Consultation Statement and requires that it:
- “(a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;*
  - (b) explains how they were consulted;*
  - (c) summarises the main issues and concerns raised by the persons consulted; and*
  - (d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan”.*
- 1.1.5 This document contains a comprehensive account of the approach to consultation used in preparation of the Neighbourhood Plan and includes the information required by Regulation 15(2).

## **2 THE DECISION TO PROCEED WITH A NEIGHBOURHOOD PLAN**

- 2.1.1 By the start of 2016 it had become increasingly clear to the Parish Council that there were high levels of concern amongst parishioners that Holme was coming under unprecedented levels of development pressure as a result of issues surrounding the 5 year land supply in the Borough. Strong encouragement to consider developing a neighbourhood plan for Holme was given by both the Parish’s Ward Councillor and the Mayor of Hunstanton.
- 2.1.2 Neighbouring parishes, notably Brancaster, already had an NDP in place and felt that the whole process of developing the plan had been very worthwhile for the community and had encouraged people to become more actively involved in the planning process and gain a better understanding of how to respond to planning applications.
- 2.1.3 The Parish Council decided to call a meeting (2 February, 2016) to determine parishioner’s views on the issue of Holme’s future and how it might be influenced by having a neighbourhood plan. The meeting was advertised electronically on the Village Information

Network and via notices posted on the Parish Council notice boards as well as in the White Horse Public House and on the notice board at the Norfolk Wildlife Trust, Firs Visitor Centre. Thirty people attended and presentations were given by an Officer from the BCKL&WN Planning Policy Team and the leader of Brancaster's NDP team.

- 2.1.4 At the end of the meeting there was a straw poll on whether Holme should embark on a neighbourhood plan. There was overwhelming support in favour. The Neighbourhood Plan was seen as a way in which the parishioners of Holme could have a strong say in determining the future shape of the Parish and ensuring that it would continue to offer its residents a high quality of life.
- 2.1.5 At the monthly meeting of the Parish Council the following week (February, 9<sup>th</sup>) it was resolved to proceed with a Neighbourhood Plan and an extraordinary meeting was called to allow for further discussion and put in the place the arrangements. Appendix 1 contains relevant minutes from each of the aforementioned meetings and the notice advertising the public consultation meeting.

### **3 CONSULTATION ON THE NEIGHBOURHOOD AREA**

- 3.1.1 A request to designate the Civil Parish of Holme-next-the-Sea as the Neighbourhood Area was submitted to BCKL&WN on 22 February 2016. This confirmed that the Parish Council would be the qualifying body in accordance with section 61G of the Town and Country Planning 1990 Act as amended.
- 3.1.2 The application was subject to a six week consultation period running from 7 March 2016 – 18 April 2016. Details of the application, including a map of the proposed Neighbourhood Area and guidance on how to make representations was made available on the BCKL&WN website. Posters were printed by the Borough Council and these were displayed on the three Parish Council notice boards, at the Village Hall, the White Horse pub and the Firs Visitor Centre at Holme Dunes. An advertisement was placed in the local press and letters were sent potentially interested parties. The Parish Council also advertised the consultation on the VIN.
- 3.1.3 There were 14 responses offering support and advice. These included responses from residents, second home owners, a local business/landowner, statutory consultees and other interested parties. There were no objections. Offers of advice and requests for meetings were followed up later in the consultation process. The Neighbourhood Area was officially designated on the 21 April, 2016.
- 3.1.4 All of the responses, along with the map of the Designated Area and the notice of designation can be found in Appendix 2.

### **4 COMMUNICATIONS STRATEGY**

#### **4.1 Approach**

- 4.1.1 On confirmation of the Neighbourhood Area, a communications strategy was agreed with the aim of ensuring that preparing the plan was as inclusive, effective, transparent and open as possible. Given the large proportion of second home owners in the Parish it was felt particularly important to use methods that would engage this section of the community. The

different methods of engaging with the community are described in the following sub-sections.

## **4.2 A dedicated Neighbourhood Plan website**

- 4.2.1 A dedicated website was chosen as the primary means of communication for all information related to the development of the plan. The site can be accessed at [regis-solutions.co.uk](http://regis-solutions.co.uk) > [hnts](http://regis-solutions.co.uk/hnts) or via the front page of the Holme Village Website (<http://www.holme-next-the-sea.co.uk/nedevplan.php>). The site was developed and maintained by members of the neighbourhood plan team using open source tools on a 'zero cost' basis. This means that the website provides a single, easily accessed point of contact containing current information, free from the distractions of other village and parish council business.
- 4.2.2 The front page of the site contains a 'latest news' area containing a rolling account of progress, the latest developments, events and news. This provides a way for people to stay up to date 'at a glance'. It also contains pointers to other important material newly loaded onto the site.
- 4.2.3 The site has a dedicated consultation area with information and reports arising from all of the public consultation activities. These include:
- Results of the Neighbourhood Area Consultation
  - Monthly reports at Parish Council Meetings
  - Information Events held in the Village Hall
  - Exhibitions mounted in the Village Hall and St Mary's Church
  - Information and feedback on the Neighbourhood Plan Questionnaire Survey

The consultation page provides a comprehensive picture of the main consultation events and how consultation feedback has been collected to guide the evolution of the Plan.

- 4.2.4 The Downloads Area of the site contains copies of all of the Neighbourhood Plan Evidence Reports. These establish a sound basis for preparation of plan policies and are a valuable resource for people interested in the Parish. Their content provides a backcloth to the mainly subjective views expressed through the consultation exercises and provides evidence-based justification for formulating policies that closely reflect parishioners' views.
- 4.2.5 In order to ensure that anybody could comment at anytime on any aspect of the Plan's development, the website contains the contact details of the Neighbourhood Plan Coordinator who has played a key role in managing the consultation process and making sure any informal comments have been passed onto and considered by the Neighbourhood Plan Team.
- 4.2.6 Finally, the website also contains an information page on Neighbourhood Planning setting out in simple terms what a neighbourhood plan is and what it can do. The aim of this was to promote informed engagement and also to manage expectations.
- 4.2.7 The website has been designed to be as simple to use as possible from any device including tablets and mobile phones. It contains a wealth of information about the parish for people who are not familiar with the Neighbourhood Area.

### **4.3 Announcements on the Village Information Network (VIN)**

4.3.1 The VIN is an e-mail communications network. It is a major channel of communication for the community and provides a forum where:

- Members of the community can be made aware of village events
- Public notices can be circulated (eg public utilities, police, health service, voluntary organisations, charities) including those from the Parish Council
- People can raise concerns, warnings and appreciation in relation to issues as diverse as road safety, crime, lost belongings, events of local interest and wildlife.

4.3.2 The network is operated by a parishioner on behalf of the community and people can subscribe free of charge by completing a simple application to become a subscriber. There are more than 150 subscribers, many providing a single point of contact for a whole household or organisation. The membership includes residents, second home owners, parish, borough, and county councillors, land owners, developers and representatives of local businesses/wildlife organisations. There are also a number of members who are based outside the Parish. The VIN is open to all comers and no application for membership has ever been refused.

4.3.3 The VIN has been used extensively to advertise and circulate Neighbourhood Plan Information.

### **4.4 Monthly Reports at Parish Council Meetings**

4.4.1 The NDP team has reported progress to the Parish Council at almost all of their monthly meetings since work commenced. Reports have also been given at the Annual Parish Meetings. Where possible information is presented in Powerpoint Slides immediately before the public participation agenda so that interested parishioners can take the opportunity to ask questions and offer comments/suggestions.

4.4.2 Following the meetings reports are posted on the Website and there is a complete record on the Consultation page of the website at [http://regis-solutions.co.uk/hnts/?page\\_id=48](http://regis-solutions.co.uk/hnts/?page_id=48).

### **4.5 Letters, public notices and advertising in the press**

4.5.1 It has been recognised that not all members of the community have access to electronic communications and care has been taken to make sure that everybody has been included by use of more traditional methods of engagement. These include:

- Posters on Parish notice boards, in the pub, the church and on lamp posts in the village
- Door to door distribution of leaflets and brochures
- Advertisements in local magazines and the press including the local Link Magazine and Hunstanton Town and Around

4.5.2 The magazines in particular reach a wide local audience living and working in the wider area (including Hunstanton, Ringstead, Old Hunstanton, Holme, Thornham, Titchwell, Brancaster and Burnham Deepdale). They reach households, shops and most local businesses.



## **4.6 Other publicity**

- 4.6.1 Every opportunity has been taken to promote the NDP and to share experience with other Parishes. In the spirit of cooperation, copies of the Neighbourhood Questionnaire Survey have been passed on to other Parishes including Sedgford, Old Hunstanton and Thornham. Surrounding parishes have also contributed to our own NDP events.
- 4.6.2 A presentation, sharing experience of developing the Neighbourhood Plan was presented by the Chair of the Parish Council at the Annual Conference of the Norfolk Coast Partnership in July 2017. Entitled 'Meeting the Challenge for Sustainable Development in the AONB', it can be found on the website Downloads page (item 11, [http://regis-solutions.co.uk/hnts/?page\\_id=39](http://regis-solutions.co.uk/hnts/?page_id=39)). It has attracted a lot of interest and proved extremely valuable in highlighting common planning issues within the AONB Parishes.

## **5 QUESTIONNAIRE SURVEY**

### **5.1 Approach**

- 5.1.1 A first step in consulting on the neighbourhood plan was to try and gain a sound understanding of parishioners' views in order to ensure that the final plan would truly represent the opinions and wishes of the community. This was achieved by completion of a comprehensive questionnaire survey seeking people's views about planning issues in the Parish.
- 5.1.2 The questionnaire was designed in conjunction with the Borough Council and a qualified statistician and tested on a small group of parishioners before use. It was distributed by hand to every household in the Parish.
- 5.1.3 It was agreed at the outset that regardless of voting eligibility, the survey should be inclusive and attempt to capture all those with a direct connection to Holme – residents, second home and mobile/caravan owners, land owners/developers and the representatives of businesses and charity organisations operating in the Parish.
- 5.1.4 The survey was timed for three weeks from mid-May 2016 covering the half term and late spring bank holidays which are one of the busiest periods for visits by second home/caravan owners. Respondents were not required to identify themselves but were required to indicate whether they were residents, second home owners or businesses. A copy of the questionnaire can be found in Appendix 3.
- 5.1.5 The survey was publicised in advance via the VIN and via flyers included in the Link magazine. Some 500 questionnaires were then delivered by hand to all properties in the Parish including secure drop off points for the caravan sites. 206 completed survey forms were returned representing a very pleasing response rate of more than 40%.
- 5.1.6 Of the total respondents 51% indicated that their main home was in the Parish, 42% replied that they had a second home and 6% a mobile home. 12 respondents said that they were land owners. At the time of the survey 213 people were recorded on the Electoral Register. 113 of the survey respondents indicated that they were on the Electoral Register.
- 5.1.7 In order to promote informed engagement with the survey and help people respond a consultation event was organised to coincide with the Annual Parish Meeting held in the Village Hall on the 10<sup>th</sup> May 2016. This took the form of a poster display which explained the

background to the work of the NDP team and their approach. The findings of some initial evidence gathering tasks were also presented including some preliminary analysis of the socio economic profile of the Parish. More than 30 people attended this event.

- 5.1.8 The display was later moved to St Mary's Church where it remained on show for the duration of the summer. Copies of the posters and material presented can be found on the NDP website (Consultation 4, [http://regis-solutions.co.uk/hnts/?page\\_id=48](http://regis-solutions.co.uk/hnts/?page_id=48)).

## 5.2 Questionnaire Survey Findings

- 5.2.1 The questionnaire results were analysed in detail and provided the basis for a number of evidence reports summarising responses for all respondents, residents and second home owners. These are available on the website at [http://regis-solutions.co.uk/hnts/?page\\_id=39](http://regis-solutions.co.uk/hnts/?page_id=39) (Downloads 2, 3 and 4). Two further reports were produced. The first of these (Points of View) summarised individual, free text responses using word clouds to assist with interpretation. The second provided an overall analysis and explanation of all the survey results. These are also available at [http://regis-solutions.co.uk/hnts/?page\\_id=39](http://regis-solutions.co.uk/hnts/?page_id=39) (Downloads 9 and 6 respectively).

- 5.2.2 The main findings of the statistical analysis were as follows:

- There is strong agreement on most issues between main and second homeowners.
- Amongst the things most people (c80%) value most about Holme are Peace and Tranquillity, the AONB setting and the safe and secure environment.
- 85% of people are concerned about inappropriate future development, particularly possible damage to the environment, the character of the village, traffic growth and road safety.
- Looking to the future, the majority of respondents feel it would be most appropriate for Holme to continue to depend on Hunstanton / larger settlements for jobs and services; most are receptive to the idea of promoting home working and locally based craft activities.
- More than 80% respondents feel the most appropriate or acceptable location for any new homes is fronting the existing road network, reinforcing the established linear form of development. Two-thirds of respondents find backland development unacceptable.
- Single dwelling infill is the preferred scale for new housing; the majority of people feel that groups of new houses such as cul-de-sacs or a small estate would be unacceptable.
- More than 70% of respondents are not concerned about the supply of new houses. Large, tall and expensive homes, along with second homes that stand empty for long periods of time, are particularly unpopular and attract a lot of criticism.
- The need for smaller and more affordable market homes suitable for younger families and down-sizers is however recognised and 85% of respondents see at least some need for semidetached homes. The majority think there are not enough younger people in Holme.
- Most people favour traditionally designed houses constructed with local building materials.
- There are strong views about the approach to the environment and extremely strong support (80%+) for positive management of most aspects of the environment and wildlife.
- Comments highlight a need to protect more of the heritage of the Parish, including some currently undesignated assets and important views of both countryside and buildings.
- Many of the views expressed are consistent with the general approach to Holme embodied in the Local Development Framework Core Strategy (2011) and Site Allocations and Development Management Policies (SADMP, 2016-2026).

5.2.3 In addition to these findings the analysis of the free text responses revealed a number of recurrent themes which were considered to be very important in the development of the neighbourhood plan. These are grouped and summarised below.

***(i) Concerns***

- Traffic growth and road safety – especially A149 and Broadwater Road
- No pavements
- A149 is a barrier to social interaction / splits the village
- Flooding from the Sea / the River Hun
- Non-adherence to planning conditions / enforcement
- Too many expensive new houses
- Too many second homes and too many empty homes
- Occupancy conditions on new homes needed
- Residential spaces disguised as garages / outbuildings
- Growth needed to sustain the village
- Too many caravans and too many holiday homes = too many empty spaces
- Speculative development / investment = empty spaces
- Short term gain = long term pain (variety of comments)
- The Parish Council isn't up to the job of the Neighbourhood Plan
- The Borough Council doesn't listen to local views
- Poor broadband and mobile communications are hindering home-based working

***(ii) Specific issues for consideration in the Neighbourhood Plan***

- Establish a development envelope / clear boundary for the village
- Maintain the open countryside around Holme
- No more back-land development
- Buildings out of character with surrounds
- Too many large houses, over-development of plots
- No more three-storey homes
- Replacement of modest / affordable homes and bungalows by larger, expensive homes
- Not enough homes for younger families and down-sizers
- Any affordable homes should only be for people with a direct link to Holme
- Limit the size of extensions
- Extend the Conservation Area
- Lack of control over biodiversity impacts in local planning policy
- Protect agricultural and traditional grazing land
- Dark skies initiative to mitigate against light pollution
- Development buffer zones to be demarcated and controlled
- Improvements to The Hun and associated habitats
- Green Corridors

***(iii) Suggestions on development / sites that might be suitable for development***

- Sites off Main Road to the east of the village
- Off Chalkpit Lane
- Former sports / cricket pitch (several suggestions)
- Land owned by the Parish Council proposed for new homes
- Large green fields in the centre of the village
- Site (s) for c6 self-build houses 1200 to 1700 sq ft with discounted land price scheme and penalties for early sale plus 6-8 affordable 2/3 bedroom homes for rent / shared ownership

- Holme needs a scheme like the Blakeney Neighbourhood Housing Society
- PC could partner housing charity to provide new homes on Parish land

**(iv) General comments and ideas**

- Create a village nucleus
- Exploit the environment through ecosystem services
- Promote small-scale self-build opportunities
- Better car parking for beach visitors
- A day pass for those who don't use public transport / slow modes (traffic-free zone?)
- Traffic calming on Beach Road
- Provide a footpath to Drove Orchards
- Provide a footpath / cycleway along the main road to Old Hunstanton
- Access to the pub for wheelchair users
- Provide units for hire – tea rooms, crafts, art gallery, maps etc to help tourists / walkers

5.2.4 In summary, the questionnaire prompted literally hundreds of comments and ideas many of which formed common themes. Along with the wider results from the statistical analysis and the analysis of socio-economic data (drawn from independent, mainly ONS sources), the findings from the questionnaire survey were taken forward to aid formulation of draft policies for the neighbourhood plan.

## **6 MAIN CONSULTATIONS, EVENTS AND EXHIBITIONS**

### **6.1 Events programme**

6.1.1 The May consultation and questionnaire survey generated a surprisingly large amount of statistical and qualitative evidence regarding people's views and preferences. It was very encouraging to find that there was a high level of consensus in the views of residents and second home owners. Statistically, this was reflected in the fact that even for the issue on which opinion was most divided there was a 66% level of agreement in responses.

6.1.2 Following on from this exercise a number of consultation events were arranged to provide feedback, refine ideas/priorities and help formulate policies for the final plan. These are described below.

### **6.2 September 2016 Exhibition**

6.2.1 The first of these events was held after the Parish Council meeting on 6<sup>th</sup> September 2016. The specific aim of this event was to provide interim feedback on the statistical results of the questionnaire survey to the community and to gauge reactions.

6.2.2 The meeting was publicised via the VIN and the Parish notice boards.

6.2.3 The large number of free text responses to the questionnaire meant that analysis was very time consuming and the results were not available at this stage. However, it was clear that parishioners had devoted considerable thought and energy to completing the questionnaires and engaging with the planning process. It was thus felt important to make it clear that this information was central to the plan and was being carefully considered.

6.2.4 Charts and summaries of the results were presented next to each of the questions allowing people to see how their views compared to those of other parishioners. Printed reports

were also on hand and available for people to borrow. Members of the NDP team and the Parish Council were on hand to answers questions and listen to suggestions.

- 6.2.5 Despite the late evening timing, over 25 people attended and following requests from those who had heard about the exhibition but had not been able to attend, the panels were moved and put on show at St Mary's Church where they remained until December.
- 6.2.6 Details of the consultation can be found at [http://regis-solutions.co.uk/hnts/?page\\_id=39](http://regis-solutions.co.uk/hnts/?page_id=39) in Consultation 5: Initial questionnaire results.

### 6.3 Presentation Day, 2017

- 6.3.1 This event took place on 5 January 2017 in the Village Hall. Almost 400 flyers advertising the event were distributed with the December edition of the Link Magazine and delivered by hand to all of the homes and businesses in the Parish. In addition a notice was published in the January edition of Link and the event was also advertised on the website and via the Village Information Network. It was timed to capture as many second home owners as possible during the holiday period. More than 50 people signed the attendance sheet.



- 6.3.2 The aim was to bring together all of the results of the evidence gathering undertaken to date and to combine this with the interim questionnaire results to provide a picture of progress in the form of a major exhibition. It was hoped that the exhibition would prompt thoughts and ideas about how the views and aspirations expressed by the community could be taken forward by the plan in the light of the available evidence.
- 6.3.3 By this time, considerable energy had been devoted to interpreting the charts and histograms from the questionnaire results and distilling distinct themes and points of view from the free text responses. This process was carried out in parallel with detailed investigation into relevant evidence from recognised published sources.

- 6.3.4 The exhibition was divided into a number of themes. These were
- Consultation headlines – this provided a broad overview of the things people value most about the Parish and their main concerns
  - Survey results overview - summary of the key findings from the questionnaire survey
  - Parish statistics from ONS – an overview of the socio economic profile of the parish and evolving trends between 2001 and 2011
  - Built environment survey – characterising the form and pattern of buildings and their main, distinctive local characteristics
  - Environment – an overview of Holme’s Protected Sites and species
  - Concerns, comments, ideas and suggestions for new development arising from previous feedback
  - Summary of parishioners’ points of view
- 6.3.5 By linking the background evidence to parishioners’ points of view it was hoped to establish a basis for identifying planning policies that would meet community aspirations and needs for the future of Holme. Interestingly, much of the evidence presented confirmed the subjective views previously expressed by parishioners.
- 6.3.6 People were encouraged to provide feedback to the NDP team and contribute to a SWOT analysis by recording their views on the strengths, weaknesses, opportunities and threats affecting the future of the Parish. The results of this analysis are included in Appendix 4. They played an important role in policy development.
- 6.3.7 By way of follow up to the 2017 Presentation Day and in order to keep the community informed, the NDP Project Coordinator placed an information notice in the October edition of the Link Magazine. This was also placed on the Village Information Network. The notice highlighted some of the key conclusions that had emerged from the event and also described ongoing consultations with key stakeholders including the statutory consultees, landowners and the local wildlife organisations. A copy of the notice can be found in Appendix 5.

## **6.4 Response to the January 2017 consultation**

- 6.4.1 The 2017 Presentation Day resulted in a much better understanding of the questionnaire survey results and, whilst the SWOT analysis gave very clear pointers for policy priorities, the exercise raised two major complicating factors. The first related to environmental degradation and the second related to the need for housing.
- 6.4.2 With respect to the environment, concerns about declining quality and damage seemed to be at odds with expectations based on the levels of protection afforded by the Protected Sites and the AONB landscape designation.
- 6.4.3 With regard to housing, the Questionnaire Survey had suggested that the majority of the community had few or no concerns about the choice of housing available in the Parish. However, the 2017 consultation revealed a much more complex picture. There was very real concern about loss of small houses and their replacement by very large ones. Furthermore,

there was some evidence suggesting that a housing allocation of perhaps ‘four or five small houses’ suitable for residents might help address the need to strengthen the resident community.

6.4.4 The realisation that a housing allocation, combined with a carefully balanced package of housing policies might be appropriate, coincided with the results of the BCKL&WN call for sites conducted in connection with the Local Plan Review. This had resulted in proposals for two sites in Holme which the Borough Council suggested should be assessed through the NDP. Given that other sites had been suggested in the 2017 consultation, it was decided that there was a need to:

- Examine whether there was justification for an allocation given Holme’s status as a SVAH
- Give full consideration to the evaluation of the proposed allocation sites
- Assess whether an allocation would have the support of the community
- Understand its likely environmental impacts and whether they would be acceptable

6.4.5 At the same time, the provisions of the 2010 Shoreline Management Plan (SMP) for managed realignment were identified. Despite its potential impact, it appeared that very few people in the Parish were aware of its existence or its implications for Holme. The possibility that over 40% of the parish could be lost to tidal inundation at any time during the plan period obviously represented a third complicating factor.

6.4.6 In view of the above it became clear that a great deal of research would be required in order to provide the evidence to design and support policies which could address these complex and potentially conflicting issues.

6.4.7 This research, much of it original, was carried out over the following months. Ultimately, it resulted in a number of key evidence papers on topics covering the Designated Areas, Water Quality, the Economy, Heritage, Ecosystem Services, Environment, Landscape and Biodiversity, and Housing. These were all made available via the Downloads Area of the Website and updated as the work progressed up to draft submission stage..

6.4.8 As part of the evidence gathering and with a view to wider consultation, a programme of meetings was organised. These included utilities, statutory consultees, landowners, businesses and conservation organisations. A summary of the meetings held during the plan development period can be found in Appendix 6.

6.4.9 The meetings were designed to ensure that stakeholder requirements were understood and taken account of during formulation of plan policies. They also provided a means of giving face to face feedback to consultees who had offered support for or requested involvement in preparation of the plan. Many of the meetings were very productive and led to further input from the participants. For example,

- The Norfolk Coast Partnership/Norfolk Rivers Trust supported a programme of water quality testing on the Hun and Broadwater Lagoon to follow up concerns about pollution.
- The Environment Agency helped draft an agreed statement on the SMP
- Natural England provided great help and encouragement in dealing with environmental degradation issues and ecosystem services and provided significant input into the

Environmental Designations Report. They also shared information in advance of the publication of their major report on the State of the North Norfolk Coast, 2019.

- 6.4.10 With regard to housing, a list of five possible allocation sites was drawn up including the two included in responses to the BCKL&WN call for sites and the three sites emerging from the January 2017 consultation. Letters were sent to the landowners explaining that their sites could be considered for allocation and seeking their agreement to the process. The template for the letters is shown in Appendix 7. Each letter was accompanied by a map showing the outline of the site. All five landowners confirmed their agreement.
- 6.4.11 On receipt of confirmations the sites were evaluated by the NDP team under the supervision of a Chartered Town Planner. The standard HELAA assessment methodology adopted by Norfolk councils was used for the evaluation.
- 6.4.12 The two sites resulting from the BCKL&WN call received four red lights in the HELAA scoring, raising doubts over their suitability. The remaining three sites all received one red light reflecting the fact that apart from the Village Hall, the pub and the church, Holme is an SVAH with no services.
- 6.4.13 In terms of overall scoring the Eastgate Barn Site stood out with a high score (88%) followed by the other two sites proposed in the NDP Consultation (both 77%). The remaining two sites scored 54% and 65% reflecting their limitations. The sites were then ranked in terms of their suitability and the outcome was reviewed and agreed at a meeting with the BC Planning Policy Team (Appendix 6, 22/09/2017). Further information on the assessment can be found in the Housing Report on the Downloads page of the website ([http://regis-solutions.co.uk/hnts/?page\\_id=39](http://regis-solutions.co.uk/hnts/?page_id=39), Download 21).
- 6.4.14 In parallel, the research into Holme's environmental condition confirmed that parishioner's concerns about degradation and damage were well founded and this was subsequently corroborated by Natural England's State of the North Norfolk Coast study.
- 6.4.15 Addressing issues of declining population; imbalance in the housing stock; a proposed small housing allocation; second homes/holiday lets/caravans; environmental decline; impacts of the Shoreline Management Plan and extensive landscape designations posed challenges for developing an effective policy package that would meet people's expectations.
- 6.4.16 Throughout this period, in response to the research and consultation activities, an initial set of draft policies (Appendix 8) was evolving aimed at addressing these issues. These were divided into two broad types. Area-specific policies based on a zoning system indicating where different types of development could be directed and area-wide policies, broadly divided according to their economic, community or environmental focus.
- 6.4.17 The proposed policies were reviewed at a meeting with the Borough Council's planning policy team (Appendix 9, 12 December, 2017). Following this meeting and updating of the policies to reflect comments, there was agreement on the zone-based approach to the Plan and a set of draft policies which could be taken to the consultation event in January 2018. Given the nature of the proposed policies it was felt important to ensure that they met the requirements of the BCKL&WN Development Management team who would be charged with implementing them.



## 6.5 Consultation on initial draft policies and Site allocation, January 2018

- 6.5.1 The initial draft plan policies, possible site allocations and the completed evidence reports were all presented at a major consultation event held in the Village Hall on 4 January 2018. The event was advertised in late November/early December 2017 via the website, the VIN, advertisements in the Link and posters on the Parish notice boards.
- 6.5.2 Given the importance attached to the event a second round of advertising was undertaken in late December/early January via the same channels. On this occasion, a notice was also placed in the Hunstanton Town and Around Magazine and a flyer was delivered to every household and business in the Parish with the help of the Link Magazine delivery team. *In order to ensure that no landowners were excluded from offering potential development sites, the notices emphasised that there was still time for late proposals and engagement with the NDP team.*

**HOLME-NEXT-THE-SEA PARISH COUNCIL**

**NEIGHBOURHOOD PLAN CONSULTATION**  
Thursday 4th January 2018

- ✚ After extensive consultation a Vision for the future of the Parish has evolved.
- ✚ Ideas for Neighbourhood Plan policies have emerged from the information collected including suggestions for housing, green spaces and the environment.
- ✚ There is still time to put forward new ideas and proposals – so if you are a parishioner, local organisation, landowner, developer or business and you would like to meet the Working Party, please get in touch as soon as possible.
- ✚ Following this Consultation the Draft Plan will be completed and submitted to statutory consultees, before going to an appointed Examiner and then put to a Referendum.

**PLEASE COME TO THE CONSULTATION EVENT**  
**YOUR VIEWS and COMMENTS are NEEDED TO HELP FINALISE THE VISION**  
**and GUIDE THE SELECTION OF POLICIES for the**  
**NEXT, VERY IMPORTANT STEP, OF DRAFTING THE PLAN**

See the website for more information <http://www.holme-next-the-sea-plan.co.uk>  
Any queries, please contact the Project Co-ordinator, Christina Jones – Tel: 01485 535065 or  
Email: [hnts4ndp@outlook.com](mailto:hnts4ndp@outlook.com)

- 6.5.3 The consultation was centred around a set of display panels. Each of these included details of draft policy wordings together with background information including maps and graphical material to help explain the policy. Tea, coffee and cakes were on sale and people were encouraged to sit down and discuss plan issues with fellow parishioners. Parish Councillors and members of the NDP team were on hand to answer questions.
- 6.5.4 The event attracted over 85 people including residents, second home owners and local business people. All of the potential allocation site owners attended.

- 6.5.5 Visitors were asked to sign in on entry and were asked to complete a two part feedback form as they went around the exhibition (Appendix 10). The first section contained a list of the draft policies and for each one, asked respondents to make comments. It also asked whether they would support or object to the plan in its entirety and to indicate whether they were on the Electoral Roll.
- 6.5.6 The second section contained the list of potential housing allocation sites. It was linked to a display containing an explanation of the allocation process, the arguments for and against having an allocation and a map showing each site and what would be built there. It asked for comments on each site. It also asked respondents to indicate whether they would support (indicating a maximum of two sites) or not support the proposed sites. They were advised that it was not necessary to allocate any sites.



- 6.5.7 The event resulted in a busy day and consultees worked very hard to assimilate the large amount of information presented and provide feedback on the forms. 67 forms were completed with 49 indicating support for the Plan and only 5 objecting. The remaining 13 forms almost all contained positive comments and support but the respondents did not complete the box indicating overall support or objection.
- 6.5.8 A very large number of comments were received on the individual policies. Most of these contained supportive remarks. In addition a number of people suggested changes, additions and improvements. Every individual comment was reviewed by the NDP Team and recorded

in a table summarising the comment, providing a short response and indicating any action taken. This can be found in Appendix 11.

- 6.5.9 With respect to the proposed housing allocation sites, respondents expressed a clear preference for the Eastgate Barn Site with over 74% indicating they would support a small development on this site with a significant number commenting that they would want to see small homes. Given this and the HELAA results, the Eastgate Barn site was subsequently taken forward (see the Housing Report for details at [http://regis-solutions.co.uk/hnts/?page\\_id=39](http://regis-solutions.co.uk/hnts/?page_id=39), Download 21). The next closest site was the Parish Council's own land adjoining the Park Piece on Peddars Way. This did well in the HELAA assessment, however it attracted a relatively large number of objections from people who felt it would detract from the adjacent local green space (Park Piece).

## **6.6 Consultation on the emerging Neighbourhood Plan and SEA/HRA screening**

- 6.6.1 Following the January 2018 consultation a table of comments on the initial set of draft policies was received from the Borough Council's Development Management Team. These were dealt with in the same way as the community comments and the table is included in Appendix 12.
- 6.6.2 All of the comments, along with more recently collated evidence were then brought together and used to help revise the draft policies in preparation for the Regulation 14 stage of the plan.
- 6.6.3 Over the following months, a first draft of the Neighbourhood Plan was written based on the evidence library, the collated comments and the revised policies. A decision was taken to structure the Plan into three parts. Part A provided an introduction to the Plan, background to the Parish and a review of the issues and opportunities. The incorporation of a relatively large amount of background material was at the request of the Parish Council and also reflects the level of interest from the local community.
- 6.6.4 Part B presented the vision objectives and approach to the Plan followed by the individual policies. Each policy was preceded by a clear statement of purpose and included supporting text explaining and justifying the policy. This was followed by a list of relevant references to higher order policy and guidance. This was deliberately detailed with a view to helping future, non-expert users of the plan to make better informed applications for planning permission and policy-based comments on planning consultations. Photographs were included where possible to illustrate the main issues.
- 6.6.5 Part C contained a comprehensive glossary of terms and was produced in response to the many questions that had been raised at consultation events.
- 6.6.6 In May 2019, the emerging Neighbourhood Plan was passed to the Borough Council to determine whether it needed a Strategic Environmental Assessment and a Habitats Regulations Assessment as required by the Environmental Assessment of Plans and Programmes Regulations (2004).
- 6.6.7 The Borough Council formed an initial screening opinion based on the information provided by the Parish Council and Annex 11 of the SEA regulations (Directive 2001/42/EC), Article 3(5). They consulted with the Statutory Consultees (Environment Agency, Natural England and Historic England) and issued a final screening decision on 24 June 2019. The decision

was that the Neighbourhood Plan would not have a likely significant effect on Protected Sites and could proceed without SEA or HRA. The final screening report and the responses from the Statutory Consultees are included in Appendix 13.

## 6.7 Consultation on Pre-submission Draft Plan (Regulation 14), January 2019

6.7.1 The Neighbourhood Planning (General) Regulations 2012, No. 637, Part 5, Regulation 14, set out the pre-submission consultation and publicity requirements for a Neighbourhood Plan as follows:

*“Before submitting a plan proposal to the local planning authority, a qualifying body must:*

*(a) Publicise in a manner that is likely to bring it to the attention of people who live, work or carry on business in the area*

*(i) details of the proposals for a neighbourhood development plan*

*(ii) details of where and when the proposals for a neighbourhood development plan may be inspected*

*(iii) details of how to make representations; and*

*(iv) the date by which those representations must be received, being **not less than 6 weeks** from the date on which the draft proposal is publicised*

*(b) Consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood plan; and*

*(b) Send a copy of the proposals to the local planning authority”.*

6.7.2 The Regulation 14 consultation period commenced on the 26<sup>th</sup> June and ran for 6 weeks until the 7 August. Hard copies of the Plan (parts A, B and C) were placed in Hunstanton Town Library and in St Mary’s Church.

6.7.3 It was publicised using a similar approach to previous consultations. This included:

- Placing a notice on the front page of the NDP website
- Placing an advertisement in the local press (Lynn News)
- Circulating notices via the Village Information Network
- Placing posters on the three Parish notice boards and at the Village Hall
- Placing notices in prominent locations around the village
- Distributing over 400 copies of a 4 page, printed brochure explaining the Neighbourhood Plan and the consultation. This was delivered by hand to all homes, caravan sites and businesses in the Parish.
- Announcements and leaflets at the July Parish Council Meeting and at Church

6.7.4 Appendix 14 contains a copy of the notice that was placed in the press, circulated on the Village Information Network and advertised on the Parish notice boards and around the village. Appendix 15 contains the four page brochure.

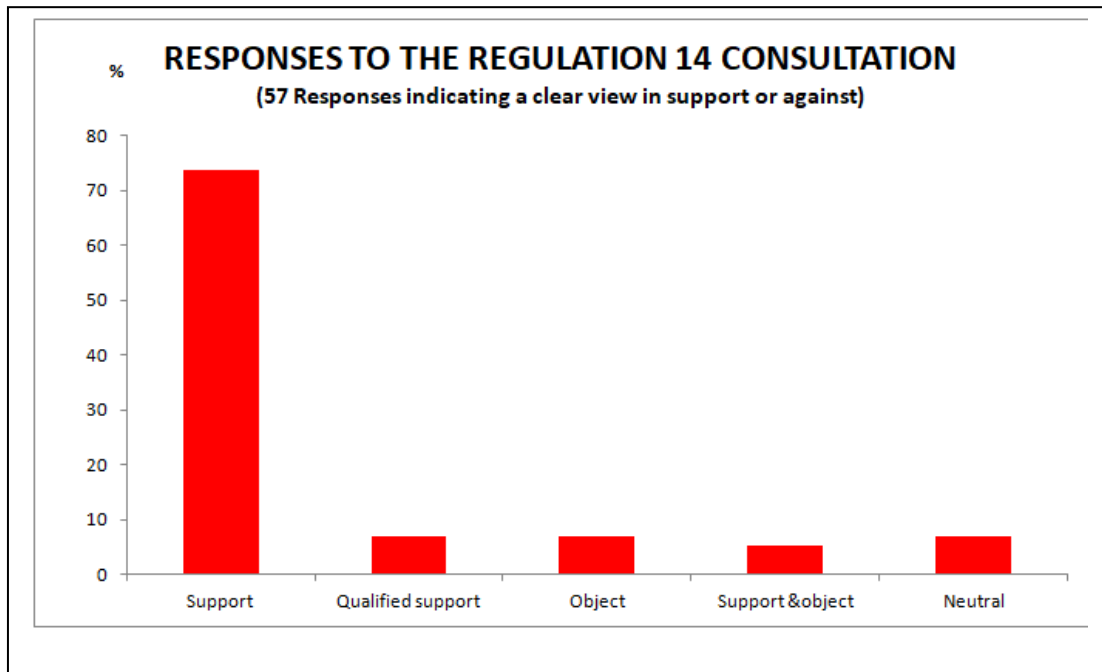
6.7.5 The Borough Council provided contact details for the organisations listed in paragraph 1, Schedule 1 of the Regulations which they deemed to be relevant to meeting the consultation requirements for the NDP. This list was supplemented with contacts identified

during development of the Plan and all of the organisations were contacted by Email containing a letter drawing the consultation to their attention and inviting them to comment. The list of contacts and the letter is included in Appendix 16. A small number of local businesses for which there was no email address were contacted by post.

- 6.7.6 Consultees were invited to comment on the Plan using a form which was available for download from the website and was also available in hard copy at all the consultation locations. It is included in Appendix 17. The form could be completed by hand or electronically and returned by post or email to the project coordinator.
- 6.7.7 In addition to the above a drop in session was held in the Village Hall on Saturday 20<sup>th</sup> July. This was advertised in all of the aforementioned publicity and also through a separate flyer (Appendix 18) that was distributed via the VIN and posted on the Parish notice boards, in the Village Hall and at other prominent locations around the village.
- 6.7.8 The event took the form of a comprehensive display containing all of the proposed policies and the supporting information. In addition reference copies of the Neighbourhood Plan and supporting documents were made available for inspection. Refreshments were offered by a local charity and people were encouraged to sit down and discuss the policies and to ask questions. The NDP team and members of the Parish Council were on hand throughout the afternoon. Despite coinciding with the worst thunder storm of the summer which brought torrential rain for much of the afternoon, more than 40 people attended. Those attending the event were asked to complete the consultation form.



- 6.7.9 In total there were over 70 responses to the consultation and those attending the consultation event in the Village Hall once again devoted considerable effort to scrutinising the policies, completing forms and contributing suggestions for the Plan.
- 6.7.10 Fourteen of those from organisations on the Schedule 1 list indicated no interest in the NDP leaving 57 responses expressing a clear view. Of these a very strong majority (74%) expressed support for the plan. A further 12% indicated either qualified support (dependent on some changes) or supported some policies and objected to others. 7% were neutral and only 5% expressed strong objections (4 respondents).



- 6.7.11 All of the comments were reviewed by the NDP Team and summarised in a table along with a response and any actions taken. The table is included in Appendix 19.
- 6.7.12 Comments provided by the Borough Council in response to the consultation are presented in a separate table (Appendix 20). These were discussed at a meeting held on 21 August 2019 (Appendix 6) along with selected responses.
- 6.7.13 The Plan subsequently was reviewed and revised in the light of the Regulation 14 comments and responses.

## 6.8 Consideration of objections

- 6.8.1 The majority of objections were dealt with by making some form of adjustment to the Plan if they proposed changes that were consistent with plan objectives, planning policy and community preferences.
- 6.8.2 However, there were three very substantial representations setting out detailed cases objecting to the NDP. All three respondents (Cruso & Wilkin, Lanpro and Ocean Breaks/Abbey Group) contended that the Plan is unsound or fails to meet the Basic Conditions.
- 6.8.3 All three organisations are developers/landowners or agents and have an interest in the allocation of sites in the Parish. Two of the sites in question were evaluated through the HELAA process and were subject to public consultation. One of these was selected for allocation (Cruso & Wilkin on behalf of Mr G. Renaut). The second achieved a very poor score in the HELAA (Ocean Breaks/Abbey Group) and the same site had previously been refused planning consent (subsequently dismissed on Appeal). The third was not put forward, either in response to the Borough Council's Call for Sites or the NDP consultation process (Lanpro on behalf of AR&V Investments LTD).

- 6.8.4 A significant part of the third site is currently the subject of an appeal against enforcement action alleging unauthorised use as a camping and caravan site/storage area for building waste and shipping containers (BCKL&WN enforcement ref 18/00319/UNAUTU; PINS ref APP/V2635/C/18/3216570)..
- 6.8.5 Two of the objections contain blocks of identical text. All are at odds with the vision and objectives of the NDP and all share some common misunderstandings of data contained in the evidence reports. Generally it was felt that the representations contained unrealistic expectations of the amount of development that could be reasonably expected in a Smaller Village and Hamlet set within an AONB and with extensive conservation designations.
- 6.8.6 In view of the length and effort devoted to these representations (one is 35 pages long) and in view of the fact that it was felt very few of the proposed changes could be accommodated, a detailed response has been made. Appendices 21 -23 (Ocean Breaks/Abbey Group, Lanpro, Cruso and Wilkin respectively) contain the responses and Appendices 24-26 contain the corresponding representations.

## **7 CONCLUSION**

- 7.1.1 This Consultation Statement has been written to meet the requirements set out in Regulation 15 of the Neighbourhood Planning (General) Regulations 2012. It provides a full account of the consultation activities carried out over the last three years. These have been extensive and have guided the preparation of the NDP.
- 7.1.2 The Parish Council is aware of the strength of the community's feelings and concerns about the future of the Parish. This is reflected in the enormous effort that parishioners have put into attending consultation events, studying evidence about the Parish and completing lengthy questionnaires to provide informed views.
- 7.1.3 From the outset the consultation strategy has aimed to be inclusive and reach all parts of the community. This has been achieved by creating a NDP website, communicating via the VIN and by more conventional methods including monthly reports at Parish Council meetings, press advertisements, posters and hand delivered flyers. Information events and exhibitions have been central to this process and have been carefully timed to encourage attendance by second home owners.
- 7.1.4 The NDP team has gone to great lengths to make sure that the Plan is evidence-based, strongly grounded in the views of the community and acceptable to the key stakeholders. Care has been taken to ensure that the views of all sections of the community – residents, second home owners, land owners, wildlife organisations, developers and businesses have been represented and given due consideration.
- 7.1.5 The Consultation Statement shows how the views of the community have been solicited and understood via an extensive questionnaire survey and how these have contributed to an initial set of draft policies. It goes on to show how these policies have evolved and subsequently been updated and refined in response to consultation feedback supported by a growing body of evidence.
- 7.1.6 The final structure of the Plan (in three parts) is possibly unusual but reflects discussions at consultation events and the Parish Council's requirement for inclusion of detailed background information. It is designed to help members of the public understand the issues

and to point future users of the Plan to relevant information to support planning applications and decisions.

- 7.1.7 Along the way there have been significant changes arising from feedback. These include new policies on the countryside, footpaths, low impact tourism, new homes and traffic and car parking. There have been numerous revisions of the zoning system including changes to the Development Envelope. In addition, policies have undergone revision and refinement to reflect feedback on the size of buildings, the impacts of new development on residential amenity and the street scene, the protection of views, the wider AONB landscape, biodiversity, pollution and water resource management.
- 7.1.8 The Borough Council have provided valuable advice and support at each stage of this process by commenting on successive policy proposals to ensure that they would be sound and fit for purpose.
- 7.1.9 All of the consultation responses have been considered in detail and a response has been provided. There is a high degree of consensus between all sections of the community. Only three substantial objections have been raised by organisations. All three have an interest in a scale of development that would not normally be expected in a Smaller Village and Hamlet in an AONB/Protected Sites setting. Detailed responses to these objections demonstrate that they have been given full consideration.
- 7.1.10 At the end of the day the Parish Council feels confident that it has met the requirements of Regulation 15 and that the resulting Submission Plan is one that will be owned by the community and is entirely consistent with the spirit of the Localism Agenda.



## 8 APPENDIX 1: PRELIMINARY MEETINGS TO DISCUSS PROPOSED NEIGHBOURHOOD PLAN

**HOLME-NEXT-THE-SEA PARISH COUNCIL**



**NEIGHBOURHOOD DEVELOPMENT  
PLAN MEETING**

**Tuesday, 2nd February 2016 at 7 pm in the Village Hall**

**Come and learn about Neighbourhood Development Plans**  
*Should your Parish Council undertake the process  
to help shape development within the Parish?*

**A representative from the Borough Council will attend  
to explain the process**

**A Councillor from a nearby Parish will be attending to share that  
Parish's experience of creating a Neighbourhood Development Plan**

## HOLME-NEXT-THE-SEA PARISH COUNCIL

### Draft Notes of the Public Information Meeting arranged by the Parish Council relating to Neighbourhood Development Plans and held in the Village Hall, Kirkgate, on Tuesday 2nd February 2016 at 7 pm

Present: Kevin Felgate (Vice Chairman) Margaret Easton  
Gillian Morley Lynn Devereux  
Robert Burton

In Attendance: Christina Jones (Clerk)

Ms Jemma March together with Mr. Brian Meredith from the Borough Council of King's Lynn and West Norfolk (BCKLWN) Planning Department and Mr. Richard Seppings from Brancaster had been invited to speak about Neighbourhood Development Plans (NDP).

There were 26 members of the public present including Borough Councillor Carol Bower and Hunstanton Mayor Andrew Murray.

Councillor Felgate welcomed everyone and thanked them for their attendance. He explained that the meeting had been arranged to explore the possibility of the village producing a NDP and obtain more information. Ms Jemma March had kindly agreed to come to provide information and answer questions and Mr. Richard Seppings had agreed to talk about his experience of the NDP in Brancaster which had just been adopted by a referendum.

Firstly, Jemma March gave general information about NDPs:

- A relatively new concept introduced by the Localism Act.
- The problem with the lack of proof of a five year land supply by BCKLWN had led to a surge of interest as communities had started to feel vulnerable.
- Can relate to whole or part of an area for development.
- Not the same as a Parish Plan and can include aspirations.
- Carries weight for planning but not highways.
- The BCKLWN Local Plan will be under pressure in the future for more strategic planning with less emphasis on specific local areas resulting in NDPs gaining in importance.
- The BCKLWN is moving away from Section 106 agreements with developments towards the Community Infrastructure Levy (CIL) which will probably be adopted by the end of the year. A parish with an NDP will receive a bigger proportion of the CIL than one without.
- It can be as simple or as complex as required.
- It is not a system for preventing any development but for directing development to suit village requirements.

She then gave the basic conditions required of an NDP which must:

- Support sustainable development and would not go forward to a referendum if it did not.
- Conform to EU regulations.
- Be consistent with the National Planning Policy Framework (NPPF).
- Be in general conformity with BCKLWN Plan ie a small village cannot be a town.
- Work out issues and talk to BCKLWN which will assist but not interfere.
- Gain more than 50% in favour in the referendum although it does not require a high turnout.

Next, she gave information on the process:

- Firstly the designated area has to be decided which is usually the whole Parish - BCKLWN will help with the plan, publish for consultation (six week period) and then a decision is made.
- Decide if a Steering Group is required - considerable input will be required for a large area.
- Funding up to £8,000. is available in support.
- Planning Aid will assist if the Parish wants to limit the input from BCKLWN.
- Decide on the issues which may, or may not, be similar to those in Brancaster - these will be informed by questionnaire.
- Issues need to be small and focused - the more complicated the issues the longer the process will take. The Parish needs to be talking to BCKLWN and / or Planning Aid at this point.
- Everything needs to be recorded - issues raised and how they were addressed.
- Some Parish Councils may have a Sustainability Assessment - impact on environment (no growth, no impact).
- Once the Plan is complete it goes to BCKLWN for a six week consultation - BCKLWN help to choose the Examiner by providing three suggestions each with personal and professional information. The Examiner / independent Inspector is paid for by BCKLWN.
- The Examiner should only make suggestions to basic requirements - BCKLWN does not have to make all the changes recommended.
- The Plan then goes to a referendum which is organised and paid for by BCKLWN.

Finally, she gave recommendations and advice:

- Most importantly, always keep in mind the reason the NDP is being completed - to safeguard what the village thinks is important.
- The government is very actively promoting more housing.
- Good areas will always be under pressure from developers.

Mr. Richard Seppings then addressed the meeting, first giving some personal information. He had had a holiday home in the area for 25 years and had lived locally for 20 years. He retired about five years ago and had been on the Parish Council in Brancaster in the past. He had become interested in the concept of NDPs at a workshop for Councillors and Clerks but did not have a background in Planning.

He gave the following information from his experiences of the NDP in Brancaster:

- It took from March 2013 to November 2015 to achieve with bursts of activity and periods of waiting but Brancaster's is a fairly simple NDP.
- It can be simple as long as it deals with issues that arise.
- Once CIL is introduced then a Parish Council gets 25% if there is an NDP but only 15% if there is not. (CIL will possibly amount to £8,500. for the average house.)
- Once the NDP is complete it cannot be altered or added to but another one can be done later - perhaps relating to business premises.
- Management consultants can be used, or the Parish Council or other group can lead process.
- There must be consistency with Planning regulations.
- BCKLWN paid for a trial examination, helped with production and was generally very helpful.
- Can look at existing NDPs for suggestions as to wording.
- Important that it is what the village wants - there can be a danger in focusing on other NDPs too much.
- The original plan can be provided by BCKLWN.
- The questionnaire only related to domestic properties, was approved by the Parish Council, some parts were tick boxes and some qualitative.
- People must be consulted and views considered - as Brancaster is a boating community, the view from the sea was an issue and no-one wanted any more big houses.
- Public meetings need to be held, and information circulated in every way possible.
- Natural England had some input to policies.
- The Examiner's alterations were fairly minor.
- At the referendum there must be in excess of 50% of the turnout in favour - in Brancaster it was 82% of a 33% turnout. The referendum is organised as for any vote by the electorate.

There was then a question and answer session:

*Question: Was it worth it for Brancaster?*

Richard Seppings thought so and there was a general feeling that it was worth it although there were those in the village who thought BCKLWN will not take notice of it.

*Question: When will CIL be effective?*

There is no CIL at the moment but BCKLWN have agreed in principle it has to go ahead, possibly by the end of the year. The impact of CIL is not yet known.

*Question: Does an NDP have any impact?*

An adopted NDP has the same weight as the Local Plan - a Parish Plan does not have the same weight.

*Question: If an NDP is not done, can one be imposed?*

No.

*Question: Can BCKLWN prevent an NDP being completed?*

Not as long as it meets the basic conditions - BCKLWN is consulted and can object but it is the Examiner who comments.

*Question: What if Holme does not have a 'village envelope' for development?*

This can be linked to an old boundary and re-instated if BCKLWN can find evidence.

*Question: Can areas be 'zoned'?*

Issues such as this need to be ironed out early on and a development boundary can be used if there has been one in the past - it has to agree with BCKLWN conditions.

*Question: Must any suggestions by the Examiner be accepted?*

Suggestions can be overruled especially if seen to be changing the basics of the NDP. If the Examiner agrees BCKLWN cannot disagree. Any recommendations made by the Examiner are taken back to the Parish.

*Question: Will CIL have any impact on a 'small village or hamlet'?*

Possibly not and major development would not be expected but every little helps and there is very little information available on CIL yet.

*Question: If the NDP fails does it all have to be done again?*

BCKLWN provides assistance and this should not happen - problems would be raised before submission. The condition statement centres on 'does it do anything illegal' and the NDP has to conform to strategic policies but it can influence events at a local level. It can be argued big houses are not sustainable.

*Question: Who are the Examiners?*

People can apply to be an Examiner and although there are no stringent conditions, there are criteria to be met, and Examiners usually have a background in Planning. They may not have local knowledge but each Examiner provides a CV giving work experience and background.

*Question: How long does an NDP last?*

Ten years although it would be expected to be updated before the ten years expires. Another part can be done at a later date. It is helpful to try to anticipate the next problems.

*Question: Does an NDP carry any weight while it is evolving?*

The further down the road the process is, the more impact it will have but it can be challenged until it is adopted.

*Question: Can two parishes work together?*

Yes, but this works best if both parishes have the same aims.

*Question: What happens when the Government changes?*

This Government is trying to focus housing on local areas and trying to do things quicker. It would be quite controversial if the process was reversed. There are more than 100 in existence now and others working through the process with big ones in areas of London and in Cumbria.

*Question: Can Management Consultants be employed?*

Yes, and funding is available but BCKLWN have a duty to advise and support and the NDP still needs to be informed by the village.

*Question: Will the Core Strategy incorporate NDPs?*

NDPs cannot be changed as they are locally led and democratically produced.

There was then some general discussion when the following points arose:

- Voters on the referendum are those on the Electoral Register.
- Issues come from the questionnaire but can be through public meetings.
- BCKLWN is increasingly under pressure for development but more at a strategic level, not the local level and is already working on the next Strategic Plan. It has also objectively assessed housing needs and the five year land supply which is currently an issue.
- CIL may be the conduit for funding in the future.
- As a village there should be concern about development but an NDP is not about stopping development, it is about shaping it.
- Employment needs can be more complex.
- There needs to be strong ownership of the NDP with a good project manager and the process needs to be driven in a way that the villagers have ownership.
- Villagers need to think about the future and then focus.
- Ownership by the village is really important.
- Management Consultants would be expensive and may not concentrate sufficiently on the village's needs.

Councillor Felgate then asked for a show of hands in support of the proposal for an NDP which was an overwhelming majority in favour.

He thanked everyone for attending and Jemma March and Richard Seppings for all their input which had been really helpful.

The meeting closed at 9.15 pm.

## Extracts from Parish Council Minutes

### Meeting held 9 Feb 2016

#### 9. Neighbourhood Development Plan Meeting (NDP).

It was agreed that the information meeting held a week previously and attended by Jemma March from BCKLWN and Richard Seppings from Brancaster had been very informative and well attended. The attendees at the meeting had overwhelmingly indicated a wish to proceed and it was **RESOLVED** (unanimously) that the Parish Council should proceed to that end. After some discussion it was agreed that an extra meeting be called to discuss the way forward and that meeting was agreed for Monday 15th February 2016 at 7pm in the Village Hall.

### Extraordinary meeting held 15 February 2016

#### 4. Neighbourhood Development Plan.

Discussion of the proposed NDP when it was agreed it was being undertaken to keep Holme-next-the-Sea alive for future generations and that local knowledge from both Councillors and villagers should be utilized wherever possible.

Discussion regarding the proposed Working Party when it was **RESOLVED** (unanimously) that:

- (i) Councillor Devereux would lead with Councillor Morley and administrative support from the Clerk.
- (ii) A standing item on the monthly Parish Council Agenda would be the NDP Working Party Report.
- (iii) Councillors and / or Parishioners should join the Working Party as their knowledge and skills dictated for varying periods of time.
- (iv) As many people as possible should be involved and make contributions as requirements dictated but not more than five at any one time.
- (v) The Borough Council should be consulted with regard to the Plan.
- (vi) The official application for a NDP should be made.

## 9 APPENDIX 2: DESIGNATION OF THE NEIGHBOURHOOD AREA AND LIST OF CONSULTEES

Borough Council of  
**King's Lynn &  
West Norfolk**



### Designation of Neighbourhood Area for Holme-next-the-Sea

#### The Town and Country Planning Act 1990 (as amended), Section 61G Neighbourhood Planning (General) Regulations 2012, Regulations 5 & 6

Holme-next-the-Sea Parish Council applied to the Borough Council on 22/02/16 for the whole of the parish to be designated a neighbourhood area. This would allow the Parish Council to prepare a neighbourhood plan for the area. As required by the regulations, the application was published and advertised. A period of 6 weeks was provided for comments on the application.

The application was advertised:

- On the Borough Council's website
- Posters were produced and made accessible at the borough councils offices in King's Lynn and Hunstanton. The posters were also displayed on Holme-next-the-Sea Parish Council noticeboard and provided to the Parish Council to display in other locations in and around the village.
- Direct notifications were sent to a list of statutory consultees whom had previously expressed an interest, or commented on the Local Plan and to organisations with an interest in the local area.
- Direct notifications were sent to neighbouring county, district and parish councils
- Direct notifications were sent to ward members for the parish.
- Direct notifications were sent to individuals, groups and organisations requested by the Parish Council.

The consultation was open from 7 March 2016 until 18 April 2016. A total of thirteen representations were received. Six representations were received from organisations with an interest in the Local Plan and neighbourhood plans. Five comments in support were received from members of the public and one with additional comments not specifically related to the application. One comment in support was received from a ward member and one comment in support was received from a local business owner.

There were no objections to the proposed neighbourhood area. Most consultees had no specific comment, either providing general advice or stating that they would like the opportunity to comment on the neighbourhood plan, if produced. Historic England provided specific advice on historical assets in the village to help inform the plan making process.

In determining the application, the Borough Council has considered the desirability of designating the whole of the parish as a neighbourhood area, and the desirability of maintaining the existing boundaries of areas already designated as neighbourhood areas. The application was for the whole parish, and there are no existing neighbourhood areas in the vicinity. No reasons were identified why a different area should be designated than that applied for. Therefore the Borough Council decided the whole of the town of Holme-next-the-Sea Parish should be designated a Neighbourhood Area with effect from today.

Executive Director

Date

# Neighbourhood Planning (General) Regulations 2012

## Neighbourhood Area Consultation

Holme next the Sea has submitted an application to the Borough Council to have a 'Neighbourhood Area' designated, which is the first stage in the process of making a Neighbourhood Plan. The whole of Holme next the Sea boundary is proposed to be included in the area. The neighbourhood Plan would relate to the area within the boundary

### Do you have any comments on the proposed area?

You can comment by:

visiting: [www.west-norfolk.gov.uk/have\\_your\\_say](http://www.west-norfolk.gov.uk/have_your_say) and click on Current Consultations

email: [ldf@west-norfolk.gov.uk](mailto:ldf@west-norfolk.gov.uk)

write to: LDF Team, King's Court, Chapel Street, King's Lynn, PE30 1EX

**Consultation period: 7 March 2016 until 18 April 2016**



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**Idf@West-Norfolk.gov.uk**

---

**From:** Venes, Tim [REDACTED]  
**Sent:** 19 April 2016 15:17  
**To:** Idf@West-Norfolk.gov.uk  
**Subject:** Holme-next-the-Sea Neighbourhood Plan

Please accept my apologies; I realise that I've missed the deadline for comment on this proposal to develop a neighbourhood plan.

If it is not too late, I simply wish to state my support for the parish council in designating the parish as an area for which a neighbourhood plan can be developed, with the aim of managing future development in the parish.

Please do keep me informed of the plan development if the designation is approved.

**Tim Venes**  
Norfolk Coast Partnership Manager

**Norfolk Coast Partnership**



**Protecting an Area of Outstanding Natural Beauty**

*Funded by Defra, Norfolk County Council, North Norfolk District Council, Borough Council of King's Lynn & West Norfolk and Great Yarmouth Borough Council*

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## Holme next the Sea

<b>Event Name</b>	Holme next the Sea
<b>Comment by</b>	Mr Anthony Foster (983059)
<b>Comment ID</b>	13
<b>Response Date</b>	31/03/16 13:45
<b>Consultation Point</b>	.0.1 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Do you support the Neighbourhood Plan?</b>	Yes

**Please enter any comments you may have on the Neighbourhood Plan in the box below.**

I think that using the Parish boundary as the area to fall under the Neighbourhood Plan is absolutely correct.

**Do you wish to be notified whether, and if so when, this neighbourhood plan is brought into force?** Yes

## Holme next the Sea

<b>Event Name</b>	Holme next the Sea
<b>Comment by</b>	Mrs Janet Foster (983061)
<b>Comment ID</b>	12
<b>Response Date</b>	31/03/16 12:52
<b>Consultation Point</b>	.0.1 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Do you support the Neighbourhood Plan?</b>	Yes

**Please enter any comments you may have on the Neighbourhood Plan in the box below.**

Very pleased to see that the Neighbourhood Plan will cover the whole of the parish.

**Do you wish to be notified whether, and if so when, this neighbourhood plan is brought into force?** Yes

## Holme next the Sea

<b>Event Name</b>	Holme next the Sea
<b>Comment by</b>	Mrs Patricia Patricia Jackson (980391)
<b>Comment ID</b>	10
<b>Response Date</b>	18/03/16 17:46
<b>Consultation Point</b>	.0.1 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.3
<b>Do you support the Neighbourhood Plan?</b>	Yes

**Please enter any comments you may have on the Neighbourhood Plan in the box below.**

I would like to know if this is a genuine consultation, likely to take account of local views. The reason that I ask is that simultaneously with this Consultation I am being asked to comment on two planning applications for development adjoining my property on land to the South of the A149 and within the envelope of the Neighbourhood Area Consultation.

Over the past two years A.R & V Investments have systematically acquired and joined up a considerable area of land behind 32-42 Main Road and extending behind the Council houses towards Peddars Way. Having built already on 32/34 Main Road they are now applying for permission to build four further houses on the 42 Main Road site. They have retained land behind their current building applications and made or applied for permission to make two roadway accesses to this land from the A149. They have also recently gained legal access to a trackway onto the land from Peddars Way/Ringstead Road.

I fear that the future of Holme-next-the-Sea may be more in the hands of a London based property developer than of the local community, which being asked to develop a Neighbourhood Plan.

It seems to me that if the villagers decide, as they may well, that they wish to restrict housing development expansion to the main village area to the North of the A149 rather than enlarge the village (by potentially 20%) towards Ringstead, their wishes will be in opposition to the plans of A.R.&V Investments who clearly have their own designs for the village and whose plans, although predictable, will no doubt only be revealed in stages over the years ahead. This drip feed "small development" strategy will make them difficult to challenge and because they are skilled in using National Government development targets and planning guidelines they are likely to be able to manipulate and undermine any locally constructed plans and aspirations.

Your reassurance that this is not inevitably the case and that King's Lynn and West Norfolk Borough Council will actively support local community views would be appreciated

**Do you wish to be notified whether, and if so when, this neighbourhood plan is brought into force?** Yes

## Holme next the Sea

<b>Event Name</b>	Holme next the Sea
<b>Comment by</b>	Historic England (Ms Debbie Mack - 56252)
<b>Comment ID</b>	6
<b>Response Date</b>	10/03/16 07:46
<b>Consultation Point</b>	.0.1 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.5
<b>Files</b>	<a href="#">006 Historic England email 10032016.pdf</a>
<b>Do you support the Neighbourhood Plan?</b>	Yes

**Please enter any comments you may have on the Neighbourhood Plan in the box below.**

No objection

Would you like to attach a file to your representation?

[006 Historic England email 10032016.pdf](#)

**Idf@West-Norfolk.gov.uk**

---

**From:** Pickles, Sebastian - [REDACTED]  
**Sent:** 10 March 2016 10:50  
**To:** Idf@West-Norfolk.gov.uk  
**Cc:** parishcouncil@holme-next-the-sea.co.uk  
**Subject:** Historic England response - Holmes-next-to-Sea Neighbourhood Plan  
**Attachments:** 16 03 10 Holme next to sea NP letter 01.pdf

Dear Sir or Madam,

Thank you for consulting Historic England on the proposed Neighbourhood Plan for Holmes-next-to-Sea. Please find attached our initial advice on the matter which will assist you in the formation of the plan.

Yours Sincerely,

Sebastian Pickles - MScCHE  
Business Officer | Historic England | East



[www.historicengland.org.uk](http://www.historicengland.org.uk)

We have launched four new, paid-for Enhanced Advisory Services, providing enhancements to our existing free planning and listing services. For more information on the new Enhanced Advisory Services as well as our free services go to our website: [HistoricEngland.org.uk/EAS](http://HistoricEngland.org.uk/EAS)



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Local Plan Tam  
Borough Council of King's Lynn and West Norfolk

By e-mail to: [ldf@west-norfolk.gov.uk](mailto:ldf@west-norfolk.gov.uk)

Our ref:  
Your ref:  
Date: 10 March 2016  
Direct Dial: 01223 582717

Dear Sir or Madam

**Ref: Holmes-next-Sea Neighbourhood Area**

Thank you for consulting Historic England about the application to designate Holmes-next-to-Sea as a Neighbourhood Area. Historic England has no objection to this designation, but we would like to take this opportunity to provide some initial advice on the matter and will send a copy to the Parish Council for their use in the event that their application is successful.

The Neighbourhood Area incorporates a number of designated heritage assets including

- Holmes-next-to-Sea Conservation Area
- The Grade I listed Church of St Mary
- 7 Grade II listed buildings (all of which lie within the Conservation Area)

It will be important that the strategy put together for this area safeguards those elements which contribute to the importance of these historic assets. This will assist in ensuring they can be enjoyed by future generations of the area and make sure it is in line with national planning policy.

The historic buildings conservation officer at Borough Council of King's Lynn and West Norfolk is the best placed person to assist the Town Council in the development of their Neighbourhood Plan and advising them to consider how the strategy might address the area's heritage assets.

We would also recommend that the Parish Council speak to the staff at Norfolk County Council Archaeology Service who look after the Historic Environment Record and give advice on archaeological matters. They should be able to provide details of not only any



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



designated heritage assets but also locally-important buildings, archaeological remains and landscapes. Some Historic Environment Records may also be available on-line via the Heritage Gateway ([www.heritagegateway.org.uk](http://www.heritagegateway.org.uk)). It may also be useful for the Town Council to involve local voluntary groups such as the local Civic Society, local history groups, building preservation trusts, etc. in the production of their Neighbourhood Plan.

Neighbourhood Plans need to include enough information about local heritage to guide planning decisions and to put broader strategic heritage policies from the local authority's local plan into action at a neighbourhood scale. If appropriate this should include enough information about local non-designated heritage assets including sites of archaeological interest to guide decisions.

Further information and guidance on how heritage can best be incorporated into Neighbourhood Plans has been produced by Historic England. This signposts a number of other documents which the Parish Council might find useful in helping to identify what it is about their area which makes it distinctive and how they might go about ensuring that the character of the area is retained. These can be found at:-

<http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely



**David Grech**  
Historic Places Adviser

cc Holmes-next-to-Sea Parish Council by e-mail to [parishcouncil@holme-next-the-sea.co.uk](mailto:parishcouncil@holme-next-the-sea.co.uk)



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



## Holme next the Sea

<b>Event Name</b>	Holme next the Sea
<b>Comment by</b>	Highways England (Mr Roger Chenery - 472975)
<b>Comment ID</b>	9
<b>Response Date</b>	14/03/16 10:07
<b>Consultation Point</b>	.0.1 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.3
<b>Files</b>	<a href="#">009 Highways England email 14032016.pdf</a>

**Please enter any comments you may have on the Neighbourhood Plan in the box below.**

I have looked at the above neighbourhood area plan for Holme-next-the-Sea, but as the area is not near to a Highways England road, I have no comments or observations to make.

Would you like to attach a file to your representation?

[009 Highways England email 14032016.pdf](#)



**Idf@West-Norfolk.gov.uk**

---

**From:** Galloway, Davina <[REDACTED]>  
**Sent:** 14 March 2016 11:53  
**To:** Idf@West-Norfolk.gov.uk  
**Subject:** Notification of application to designate a neighbourhood area for Holme-next-the-Sea

Dear Sir/Madam

I have looked at the above neighbourhood area plan for Holme-next-the-Sea, but as the area is not near to a Highways England road, I have no comments or observations to make.

Regards.

Davina Galloway

**Davina Galloway**  
Asset Delivery Manager  
Network Delivery and Development  
Highways England [REDACTED]

[REDACTED]

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[REDACTED]

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## Holme next the Sea

<b>Event Name</b>	Holme next the Sea
<b>Comment by</b>	Drove Orchards (Mr Andrew Jamieson - 979265)
<b>Comment ID</b>	8
<b>Response Date</b>	13/03/16 16:10
<b>Consultation Point</b>	.0.1 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Do you support the Neighbourhood Plan?</b>	Yes

**Please enter any comments you may have on the Neighbourhood Plan in the box below.**

Happy to support the Neighbourhood Plan and would welcome the opportunity to provide input

**Do you wish to be notified whether, and if so when, this neighbourhood plan is brought into force?** Yes

## Holme next the Sea

<b>Event Name</b>	Holme next the Sea
<b>Comment by</b>	Mrs Alison Michalska (979199)
<b>Comment ID</b>	7
<b>Response Date</b>	11/03/16 23:00
<b>Consultation Point</b>	.0.1 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Do you support the Neighbourhood Plan?</b>	Yes
<b>Do you wish to be notified whether, and if so when, this neighbourhood plan is brought into force?</b>	Yes

## Holme next the Sea

<b>Event Name</b>	Holme next the Sea
<b>Comment by</b>	Anglian Water Services Ltd ( Hannah Wilson - 285142)
<b>Comment ID</b>	5
<b>Response Date</b>	09/03/16 13:59
<b>Consultation Point</b>	.0.1 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.5
<b>Files</b>	<a href="#">005 Anglian Water Services Ltd email 09032016.pdf</a>

**Please enter any comments you may have on the Neighbourhood Plan in the box below.**

No comment

**Do you wish to be notified whether, and if so when, this neighbourhood plan is brought into force?** Yes

Would you like to attach a file to your representation?

[005 Anglian Water Services Ltd email 09032016.pdf](#)

**Idf@West-Norfolk.gov.uk**

---

**From:** Bull Sue [REDACTED]  
**Sent:** 09 March 2016 08:57  
**To:** Idf@West-Norfolk.gov.uk  
**Subject:** Holme next to the Sea Neighbourhood Designation Area

Thank you for the opportunity to comment on the above.

We have no comments to make at this time, however if the Neighbourhood Plan progresses we would welcome the opportunity to comment on later stages on any aspects relevant to Anglian Water.

Regards

**Sue Bull**  
**Planning Liaison Manager**

**Anglian Water Services Limited**



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## Holme next the Sea

<b>Event Name</b>	Holme next the Sea
<b>Comment by</b>	Natural England ( Tamara Rowson - 285466)
<b>Comment ID</b>	4
<b>Response Date</b>	08/03/16 07:31
<b>Consultation Point</b>	.0.1 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.5
<b>Files</b>	<a href="#">004 Natural England email 08032016.pdf</a>

**Please enter any comments you may have on the Neighbourhood Plan in the box below.**

Advice provided

Would you like to attach a file to your representation?

[004 Natural England email 08032016.pdf](#)

**Idf@West-Norfolk.gov.uk**

---

**From:** Consultations (NE) [mailto:consultations@naturalengland.org.uk]  
**Sent:** 08 March 2016 16:22  
**To:** Idf@West-Norfolk.gov.uk  
**Subject:** FW: Notification of application to designate a neighbourhood area for Holme-next-the-Sea - NE RESPONSE  
**Attachments:** 180174 Holme NE RESPONSE .pdf; NE Feedback Form June 2015.pdf

Dear Sir or Madam,

Please see attached our response in relation to the below consultation.

Kind Regards  
Rachel.

Rachel Bowden  
Technical Support Adviser  
Natural England



[www.gov.uk/natural-england](http://www.gov.uk/natural-england)

**We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.**

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For further information on the Discretionary Advice Service see [here](#)

For further information on the Pre-submission Screening Service see [here](#)

---

**From:** Idf@West-Norfolk.gov.uk [mailto:Idf@West-Norfolk.gov.uk]  
**Sent:** 01 March 2016 12:28  
**Subject:** Notification of application to designate a neighbourhood area for Holme-next-the-Sea

Date: 8 March 2016  
Our ref: 180174  
Your ref: Holme next the Sea



Kings Lynn and West Norfolk  
King's Court  
Chapel Street  
King's Lynn  
PE30 1EX

**BY EMAIL ONLY**

Dear Sir or Madam

Application to designate a neighbourhood area Holme-next-the-Sea

Thank you for notifying Natural England of your Neighbourhood Planning Area in your email dated 01/03/2016.

We would like to take this opportunity to provide you with information sources you may wish to use in developing your plan, and to highlight some of the potential environmental risks and opportunities that neighbourhood plans may present. We have set this out in the annex to this letter.

Natural England's role

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Your local planning authority should be able to advise you when we should be consulted further on your neighbourhood plan.

Planning policy for the natural environment

Neighbourhood plans and orders present significant opportunities, but also potential risks, for the natural environment. Your proposals should be in line with the National Planning Policy Framework. The key principles are set out in paragraph 109:

- The planning system should contribute to and enhance the natural and local environment by:
- protecting and enhancing valued landscapes, geological conservation interests and soils;
  - recognising the wider benefits of ecosystem services;
  - minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

You should also consider the natural environment policies in your area's Local Plan. Your neighbourhood plan or order should be consistent with these, and you may decide that your plan should provide more detail as to how some of these policies apply or are interpreted locally.

The attached annex sets out sources of environmental information and some natural environment issues you may wish to consider as you develop your neighbourhood plan or order.





We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely,

Miss Rachel Bowden  
Consultations Team



# Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

## Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)<sup>1</sup> website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)<sup>2</sup>.

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)<sup>3</sup>. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

**National Character Areas** (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)<sup>4</sup>.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)<sup>5</sup> website and also from the [LandIS website](http://landis.org.uk/)<sup>6</sup>, which contains more information about obtaining soil data.

## Natural environment issues to consider

The [National Planning Policy Framework](#)<sup>7</sup> sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)<sup>8</sup> sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

<sup>1</sup> <http://magic.defra.gov.uk/>

<sup>2</sup> <http://www.nbn-nfbr.org.uk/nfbr.php>

<sup>3</sup> <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>4</sup> <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

<sup>5</sup> <http://magic.defra.gov.uk/>

<sup>6</sup> <http://www.landis.org.uk/index.cfm>

<sup>7</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>8</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>



## Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

## Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)<sup>9</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>10</sup>. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

## Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)<sup>11</sup>) or protected species. To help you do this, Natural England has produced advice [here](#)<sup>12</sup> to help understand the impact of particular developments on protected species.

## Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)<sup>13</sup>.

## **Improving your natural environment**

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.

<sup>9</sup> <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>10</sup> <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

<sup>11</sup> <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>12</sup> <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

<sup>13</sup> <http://publications.naturalengland.org.uk/publication/35012>



- Adding a green roof to new buildings.

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#)<sup>14</sup>).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

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<sup>14</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>



## Holme next the Sea

<b>Event Name</b>	Holme next the Sea
<b>Comment by</b>	Sport England ( - 901280)
<b>Comment ID</b>	3
<b>Response Date</b>	02/03/16 11:39
<b>Consultation Point</b>	.0.1 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.3
<b>Files</b>	<a href="#">003 Sport England email 02032016.pdf</a>

**Please enter any comments you may have on the Neighbourhood Plan in the box below.**

Providing Planning Guidance

Would you like to attach a file to your representation?

[003 Sport England email 02032016.pdf](#)

**Idf@West-Norfolk.gov.uk**

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**From:** Zoe Hughes <[REDACTED]>  
**Sent:** 02 March 2016 10:52  
**To:** Idf@West-Norfolk.gov.uk  
**Subject:** Notification of application to designate a neighbourhood area for Holme-next-the-Sea

Thank you for consulting Sport England on the above Neighbourhood Consultation.

Planning Policy in the **National Planning Policy Framework** identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process and providing enough sports facilities of the right quality and type and in the right places is vital to achieving this aim. This means positive planning for sport, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing and employment land and community facilities provision is important.

It is important therefore that the Neighbourhood Plan reflects national policy for sport as set out in the above document with particular reference to Parts 73 and 74 to ensure proposals comply with National Planning Policy. It is also important to be aware of Sport England's role in protecting playing fields and the presumption against the loss of playing fields (see link below), as set out in our national guide, '**A Sporting Future for the Playing Fields of England – Planning Policy Statement**'.  
<http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/>

Sport England provides guidance on developing policy for sport and further information can be found following the link below:  
<http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/>

Sport England works with Local Authorities to ensure Local Plan policy is underpinned by robust and up to date assessments and strategies for indoor and outdoor sports delivery. If local authorities have prepared a Playing Pitch Strategy or other indoor/outdoor sports strategy it will be important that the Neighbourhood Plan reflects the recommendations set out in that document and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support the delivery of those recommendations.  
<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/>

If new sports facilities are being proposed Sport England recommend you ensure such facilities are fit for purpose and designed in accordance with our design guidance notes.  
<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

If you need any further advice please do not hesitate to contact Sport England using the contact details below.

Yours sincerely

Planning Administration Team  
Planning.central@sportengland.org

**Zoe Hughes**  
Senior Planning Administrator



## Holme next the Sea

<b>Event Name</b>	Holme next the Sea
<b>Comment by</b>	Ward Cllr - Hunstanton (Cllr Richard Bird - 901321)
<b>Comment ID</b>	2
<b>Response Date</b>	01/03/16 08:19
<b>Consultation Point</b>	.0.1 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.4
<b>Files</b>	<a href="#">002 Cllr Richard Bird email 01032016.pdf</a>

**Do you support the Neighbourhood Plan?** Yes

**Please enter any comments you may have on the Neighbourhood Plan in the box below.**

In support

Would you like to attach a file to your representation?

[002 Cllr Richard Bird email 01032016.pdf](#)

**ldf@West-Norfolk.gov.uk**

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**From:** Cllr Richard Bird  
**Sent:** 01 March 2016 16:23  
**To:** ldf@West-Norfolk.gov.uk  
**Subject:** RE: Notification of application to designate a neighbourhood area for Holme-next-the-Sea

Rec'd & u/stood.

I have indicated to Holme P/C that I am in favour & have offered help if required.

K.r.

Richard B.

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**From:** [ldf@West-Norfolk.gov.uk](mailto:ldf@West-Norfolk.gov.uk)  
**Sent:** 01 March 2016 12:28  
**Subject:** Notification of application to designate a neighbourhood area for Holme-next-the-Sea

The Borough Council have contacted you because you or your organisation may have an interest in the local area or you have previously requested details of future Neighbourhood Plans.

Holme-next-the-Sea Parish Council have applied to the Borough Council to designate a neighbourhood area, and for this to cover the whole of Holme-next-the-Sea Parish. Designation would enable the Parish Council to prepare a Neighbourhood Development Plan for that area.

The Neighbourhood Area application can be viewed:

- Online at [http://consult.west-norfolk.gov.uk/portal/neighbourhood\\_plan/neighbourhood\\_area/holmena/holme\\_next\\_the\\_sea](http://consult.west-norfolk.gov.uk/portal/neighbourhood_plan/neighbourhood_area/holmena/holme_next_the_sea)
- At the following Borough Council offices
  - King's Court, Chapel Street, King's Lynn, Norfolk, PE30 1EX
  - Hunstanton Council Information Centre, Valentine Road, Hunstanton, Norfolk PE36 5EF
- On Holme-next-the-Sea Parish Council notice board

Comments are invited on the proposed designation from Monday 7<sup>th</sup> March until 5pm Monday 18<sup>th</sup> April 2016.

You can comment:

- via the website at [http://consult.west-norfolk.gov.uk/portal/neighbourhood\\_plan/neighbourhood\\_area/holmena/holme\\_next\\_the\\_sea](http://consult.west-norfolk.gov.uk/portal/neighbourhood_plan/neighbourhood_area/holmena/holme_next_the_sea)
- by email: [ldf@west-norfolk.gov.uk](mailto:ldf@west-norfolk.gov.uk), or;
- by post: Local Plan Team, Borough Council of King's Lynn and West Norfolk, King's Court, Chapel Street, King's Lynn PE30 1EX

If you would not like to be notified about any future consultations regarding Holme-next-the-Sea Neighbourhood Development Plan or if you have any other queries, please email the Local Plan team [ldf@west-norfolk.gov.uk](mailto:ldf@west-norfolk.gov.uk) or telephone (01553) 616816.

**Issued by the Borough Council of King's Lynn & West Norfolk under the Neighbourhood Planning (General) Regulations 2012 and Town and Country Planning Act 1990 (as amended).**



## Holme next the Sea

<b>Event Name</b>	Holme next the Sea
<b>Comment by</b>	Norfolk County Council (Highways) (Mr Stephen Faulkner - 474720)
<b>Comment ID</b>	1
<b>Response Date</b>	01/03/16 08:15
<b>Consultation Point</b>	.0.1 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.5
<b>Files</b>	<a href="#">001 NCC Stephen Faulkner email 01032016.pdf</a>

**Do you support the Neighbourhood Plan?** Yes

**Please enter any comments you may have on the Neighbourhood Plan in the box below.**

No objection

Would you like to attach a file to your representation?

[001 NCC Stephen Faulkner email 01032016.pdf](#)

**Idf@West-Norfolk.gov.uk**

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**From:** Faulkner, Stephen [REDACTED]  
**Sent:** 01 March 2016 15:52  
**To:** Idf@West-Norfolk.gov.uk  
**Cc:** Waters, Laura  
**Subject:** RE: Notification of application to designate a neighbourhood area for Holme-next-the-Sea

Thank you for consulting the County Council on the above proposed designation.

I can confirm, under delegated officer powers, that Norfolk County Council does not have any objection to this designation.

Regards

Stephen

**Stephen Faulkner** BA (Hons), MSc, DipTP, MRTPI, CiLCA  
Principal Planner  
Community and Environmental Services



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## Holme next the Sea

<b>Event Name</b>	Holme next the Sea
<b>Comment by</b>	Mr Robert Jolly (982950)
<b>Comment ID</b>	11
<b>Response Date</b>	30/03/16 20:19
<b>Consultation Point</b>	.0.1 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Do you support the Neighbourhood Plan?</b>	Yes

**Please enter any comments you may have on the Neighbourhood Plan in the box below.**

I believe the Plan to be in the best of interests of residents.

**Do you wish to be notified whether, and if so when, this neighbourhood plan is brought into force?** Yes

## List of individual consultees for Neighbourhood Area Boundary Consultation

Full Name	Organisation Details	Category Interest - Please enter your representation interest.
Cllr Carol Bower	Ward Cllr - Hunstanton	Councillor
Cllr Paul Beal	Ward Cllr - Hunstanton	Councillor
Cllr Richard Bird	Ward Cllr - Hunstanton	Councillor
Cllr Richard Blunt	Ward Cllr Walpole Ward	Councillor
Katie Adderley	British Wind Energy Association	Information Request
Francesca Wray		Interested Party
Graham Moore	Planning Engineer Middle Level Commissioners	Interested Party
Ken Hamilton PhD FSA MCIFA	Historic Environment Service	Interested Party
MARY-JANE O'NEILL	Maddox & Associates Ltd	Interested Party
Tim Venes	Norfolk Coast Partnership	Interested Party
	Norfolk Wildlife Trust	Interested Party
	RSPB	Interested Party
	Norfolk Ornithologist Association	Interested Party
Drove Orchards Limited		Member of the Public
Lord Peter Melchett		Member of the Public
Mr M P Kelly		Member of the Public
Mr. D.M.Gorton		Member of the Public
Mrs Lucy Mountain		Member of the Public
Ms Elaine Elstone	Secretary Tetlow King Planning	Member of the Public
Oliver and Victoria O'Connor		Member of the Public
Skinner		Member of the Public
The Licensee	The White Horse	Member of the Public
	Sport England	Member of the Public
		Member of the Public
	Old Hunstanton WI	New Entry
Mr Steve Reddington	Parish Clerk Ringstead Parish Council	Parish Council
Mrs Christina Jones	Parish Clerk Holme-Next-The-Sea Parish Council	Parish Council
Ms Jennifer Shah	Parish Clerk Old Hunstanton Parish Council	Parish Council
Sarah Bristow	Parish Clerk Thornham Parish Council	Parish Council
Corinne Meakins	Green Infrastructure Advisor Forestry Commission England	Statutory Consultee
Louise Oliver	Consultation Service Natural England	Statutory Consultee
Miss Emily Crook	Planning Liaison Officer The Environment Agency	Statutory Consultee
Mr David Grech	Historic England	Statutory Consultee
Mr Roger Chenery	Highways England	Statutory Consultee
Mr Stephen Faulkner	Norfolk County Council (Highways)	Statutory Consultee
North Norfolk District Council	Head of Planning	Statutory Consultee
Rose Freeman	Planning Policy Officer Theatres Trust	Statutory Consultee
Simon Garner	National Trust	Statutory Consultee
Sue Bull	Planning Liaison Manager Anglian Water Services Ltd	Statutory Consultee
George Needham	Holme Next The Sea Village Facilitator	Village Workshop Facilitator

## 10 APPENDIX 3: QUESTIONNAIRE SURVEY FORM

### A letter from the Parish Council about the Neighbourhood Plan Survey

*Dear Resident / Homeowner,*

*As many of you will already know Holme-next-the-Sea Parish Council is working towards the development of a Neighbourhood Plan. As part of this process we want to take on board your views about the way you think the Parish should develop over the next 20 years. We will be organising consultation activities at key points throughout our programme of plan development but we want to make a start by asking some questions that will help us understand your views. This survey is designed to do just that. Your reply will be anonymous and any information provided will only be used for preparing the Neighbourhood Plan.*

*In the questionnaire enclosed you are asked to provide some basic information about yourself and your household, what you like and dislike about Holme-next-the-Sea and how you would like to see the village develop in the future. Although it is only those on the Electoral Register who will be eligible to vote in the Neighbourhood Plan Referendum, we are trying to establish the views of the whole community, including those for whom Holme-next-the-Sea is a second or holiday home.*

*District Councils and Parishes across the country are coming under enormous pressure from government to make room for new development - especially for housing. A Neighbourhood Plan will enable us to develop policies that will be used to determine planning applications and so give us more influence over future changes in the village than we have at present. Please do make your views known and spend a little time completing this questionnaire. It is very important for the future of our village.*

*Yours,*

*Christina*

Christina Jones (on behalf of Holme-next-the-Sea Parish Council)

Parish Clerk, Holme-next-the-Sea Parish Council, 27B Homefields Road, Hunstanton PE36 5HL Telephone 01485 535065

#### **What to do next**

You can find more information about Neighbourhood Planning on the back cover of the questionnaire. You may find it helpful to read this before you start answering the questions.

**We would like to have a response from every member of the Community and we are supplying two copies of the questionnaire to every household in the Parish. Please take your time to read the questions and complete the questionnaire as fully as you can.**

If you need help to complete or return the survey, if you need additional copies of the form for other members of your household, or if you would like any further information, please contact Margaret Easton (Tel 07760 379 759) who will arrange for someone from the Neighbourhood Plan Team to contact you.

**The survey must be returned by 2 June 2016. See the end of the questionnaire for details.**

**HOLME-NEXT-THE-SEA**  
**NEIGHBOURHOOD PLAN 2016-2036**  
**QUESTIONNAIRE SURVEY**



**HAVE YOUR SAY - NOW!**

**YOU have the chance to influence future development in YOUR village over the next 20 years. Please help the Parish Council to take on board YOUR views by completing this survey and returning it by 2 June 2016**

**Section 1 About you**

1-1 What is your connection with Holme-next-the-Sea? (Please tick all that apply)

Main home here	Work here	Second home here	Mobile home here	Landowner	Other (please specify)
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1-2 How long have you had a connection with Holme-next-the-Sea? (Please tick one)

Less than a year	1-5 years	6-10 years	More than 10 years
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1-3 What is your age group? (Please tick one)

Under 18	18-25	26-49	50-69	70-84	85 or over
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1-4 Please tick the box that best describes you

Full-time education	Employed	Self-employed	Retired	Other
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1-5 How many people normally live in your household? \_\_\_ adults and \_\_\_ children under 18

1-6 Are you on the electoral register and so entitled to vote in the Parish? Yes \_\_\_ No \_\_\_

**Section 2 What do you think about Holme-next-the-Sea today and in the future?**

2-1 What do you like about Holme-next-the-Sea? (Please tick one box in each line)

	1 Not important	2 Quite important	3 Important	4 Very important
Being near the sea				
Area of Outstanding Natural Beauty				
Peace and tranquillity				
Nearby nature reserves and wildlife				
Choice of houses to buy				
Choice of houses to rent				
Green and open spaces within the village				
The village community				
Safe and secure neighbourhood				
Access to local schools				
Access to local employment				
Access to health and care services				
Access to local services and shops				
Footpaths and walks				
Good public transport				
Other (please specify)				

2-2 What do you think of the age mix in Holme-next-the-Sea? (Please tick all that apply)

1 A good mix of ages	2 Too many older people	3 Not enough younger people
----------------------	-------------------------	-----------------------------

2-3 What are your concerns about future developments in the Parish? (Tick one box in each line)

	1 Not concerned	2 A little concerned	3 Very concerned
Inappropriate types of development			
Overall scale of development			
Not enough new houses			
Not enough new low-cost houses			
Size of new houses			
Density of new housing			
Damage to the village's attractive appearance			
Out of character development			
Loss of open landscape and green spaces			
Loss of peace and tranquillity			
Increasing light pollution			
Loss of wildlife and habitats			
Traffic growth and road safety			
Roadside pavements and pedestrian safety			
Inadequate car parking			

2-4 How do you see the role of the village in the future? (Please tick one box in each line)

	1 Unacceptable	2 Acceptable	3 Most appropriate
A residential village depending on Hunstanton and larger settlements for jobs and services			
More focus on tourism with better visitor facilities			
More opportunities for home-based working – for example professional practice and local crafts			
An economic centre in its own right with more services, new jobs and related infrastructure			
Similar to village we have now even if a little larger			

### Section 3 Housing

Councils are under enormous government pressure to guarantee the supply of land required to meet future housing needs and over the next twenty years the Parish will need some new homes. The Neighbourhood Plan cannot block development included in the Borough Plan but can influence its location, layout and design. Without a Neighbourhood Plan these decisions will be led by others.

3-1 If there is a need for new housing where do you think would be the best places for it to go? (Please tick one box in each line)

	1 Unacceptable	2 Acceptable	3 Most appropriate
Within the existing village built-up area			
Outside the edges of the main built-up area			
Fronting onto the existing road network			
On sites behind existing houses			
Elsewhere in the parish			



3-2 What do you think is the right scale for future housing development? (Please tick one box in each line)

	1 Unacceptable	2 Acceptable	3 Most appropriate
Single dwellings between existing houses			
1 - 3 dwellings between existing houses			
Groups of 3 – 5 dwellings on new sites			
Groups of 5 or more dwellings on new sites			
Groups of dwellings around cul-de-sacs			
Small estate			

3-3 What kind of housing do you think is needed in the future? (Please tick one box in each line)

	1 Not needed	2 Some need	3 Most needed
Owner occupied homes – occupied full time by the owner			
Second home – for exclusive use of owner and family			
Housing Association - for shared ownership			
Housing Association - for rent			
Private rented (Privately owned houses rented directly from the landlord)			
Homes suitable for retired people			
Inexpensive homes for first time buyers			
High end, expensive market homes			
Holiday lets			
Mobile homes / caravans			

3-4 Thinking about the current choice of homes in the village, what type of new houses do you think will be needed? (Please tick one box in each line)

	1 Not needed	2 Some need	3 Most needed
Detached houses			
Semi-detached houses/cottages			
Terraced houses/cottages			
Bungalows			
Houses with space for home/teleworking			
Eco-homes			
Affordable homes for sale			
Affordable homes for rent			
Sheltered accommodation for elderly people			
Flats			
Holiday accommodation			
Land for self-build			

3-5 What do you think are the right sizes and heights for any future homes in the village? (Please tick one box in each line)

	1 Not needed	2 Some need	3 Most needed
1 bedroom			
2 bedrooms			
3 bedrooms			
4 bedrooms			
5 or more bedrooms			
Single storey			
2 storeys			
3 storeys			

3-6 What do you think are the important features for any new homes in the village? (Please tick one box in each line)

	1 Not important	2 Quite important	3 Important	4 Very important
Excellent design and layout				
Variety of housing types				
Use of local building materials				
Good-sized gardens				
Plenty of car parking space				
Easy access to public transport				

3-7 What do you think the styles and building materials should be for any new housing in the village? (Please tick one box in each line)

	1 Unacceptable	2 Acceptable	3 Most appropriate
Traditional design			
Modern design			
A mixture of traditional and modern design			
Clay roof pantiles			
Slate roof pantiles			
Solar panels			
Eco-roofing			
Brick walls			
Carrstone, chalk or flint walls mixed with brick			
Timber clad walls			
Contemporary materials eg sheet glass, zinc or other metals			

**Section 4 Employment**

4-1 Should the following activities be encouraged in the Parish to promote jobs? (Please tick one box in each line)

	1 Unacceptable	2 Acceptable	3 Most appropriate
Agriculture – intensive			
Agricultural – smallholdings or pasture			
Small business on an industrial estate			
Home-based cottage industry/manufacturing			
Retail developments			
Service companies (eg servicing holiday lets)			
Home-based professional activities			
Local crafts			
A wider range of tourism attractions			
Tourism focused on the natural environment			

4-2 Will anyone in your family be seeking a local job in the next 5 years? Yes\_\_\_ No\_\_\_

**Section 5 Local environment and community facilities**

5-1 How important is it that the Neighbourhood Development Plan promotes the following (Please tick one box in each line)

	1 Not important	2 Quite important	3 Important	4 Very important
Protection of green spaces				
Protection/improvement of trees & hedgerows				
Positive management of the landscape				
Protection of natural & cultural heritage				
Positive management of local habitats & wildlife				

5-2 How do you get around? Please tick any of these that you use every week

Private car	Bus	Taxi	Motorbike	Bike	On foot
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5-3 How often do you use the bus? (Please tick one)

Most days	Every week	Every month	Occasionally	Never
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5.4 Are there any particular places, buildings or views in the Parish which you believe are important to protect? Please describe in box below:

5.5 Are there any particular community services or facilities you would like to see provided or improved in the Parish?

**Section 7** *Any other comments you wish to make about Holme-next-the-Sea including any suggestions for the Neighbourhood Plan*

**Thank you for taking the time to participate in our survey. Please return your completed questionnaire no later than 2 June by hand to any one of the following:**

**Meadow Springs - 15 Eastgate (west side of Eastgate)**

**46 Main Road (south side of Main Road)**

**Haystacks - 53 Peddars Way (south of Main Road)**

**Or post to: Parish Clerk at 27B Homefields Road, Hunstanton PE36 5HL**

## **What is a Neighbourhood Plan?**

Neighbourhood Plans will be new to many people. They were introduced through the 2011 Localism Act and Holme-next-the-Sea is just the sixth Parish in the Borough to grasp the opportunity to influence our future in this way.

The key feature of a Neighbourhood Plan is that it enables the local community to develop a shared vision for the future of their own village or town. This means:

- Choosing where new homes and other development should be built
- Influencing how development should be laid out and what buildings should look like
- Identifying and protecting valued green spaces or other locally valued or historic assets

The Neighbourhood Plan cannot block development that is already allocated through the Local Plan, but because it can shape where that development will go and what it will look like developers and local authority planners will have to take notice of it.

Once adopted our Neighbourhood Plan will be incorporated into the Local Development Framework for Kings Lynn and West Norfolk and the policies it contains can be used in the determination of planning applications. Without a Neighbourhood Plan we will have little control over any future development that takes place in Holme-next-the-Sea and the Parish Council will receive less community funds (through the new Community Infrastructure Levy) from eligible new developments.

### **How does Neighbourhood Planning work in practice?**

The local parish or town council usually takes the lead.

The Local Planning Authority (Kings Lynn & West Norfolk Borough Council in the case of Holme-next-the-Sea) must also be involved in the process in the three main ways:

- Making decisions at key stages of the process – for example in approving the area (the Neighbourhood Area) over which the Neighbourhood Development Plan will have effect.
- Arranging for an independent examination of the plan.
- Organising a community referendum. This is an important milestone at the end of the process allowing those that live in the neighbourhood area to decide whether or not the Neighbourhood Development Plan is adopted.

**The success of the whole process depends upon securing the support of our whole village community at an early stage in the process. The results of this survey will determine the underpinning principles and overall direction of our plan and so it is really important that you, your family and your neighbours take this opportunity to make your views known!**

## **11 APPENDIX 4: PARISH SWOT ANALYSIS – JANUARY 2017 CONSULTATION**

### **STRENGTHS TO BUILD ON**

- Outstanding landscape and natural environment - AONB
- Special planning designations
- Wonderful wildlife
- Small but strong and active resident community
- Common values and shared interests
- Age structure of population conducive to community involvement
- Traditional buildings and rich history
- Green residential environment
- Drove Orchards – creates jobs and attracts visitors
- The VIN – to communicate even more

### **WEAKNESSES TO OVERCOME**

- Second homeowners outnumber residents
- Too few younger residents
- Too many holiday homes
- Unbalanced housing stock
- Over-dependence on car not sustainable
- Not enough footpaths or cycleways
- No car parking for Village Hall or Church
- Poor access to community facilities and Parish shopping
- Over-dependence on retail employment
- Poor broadband / IT communications

### **OPPORTUNITIES TO GRASP**


- Village Hall available for more community activities
- Improve green infrastructure / biodiversity network
- Improve footpath network/pedestrian safety – with landowner help
- PC owns land in village & could purchase more for principal homes
- PC could purchase land for footpaths / negotiate permissive routes
- Many existing houses suitable for home-based working
- Rich heritage to protect / exploit
- Good location for a combined heritage / community centre
- Participate in Neighbourhood Plan process!

## THREATS TO BE ADDRESSED

- Falling resident population and increase in holiday homes
- Replacement dwellings – loss of traditional village homes
- Loss of agricultural land
- Poor development control
- Impact of development and visitors on protected habitats and species
- Impact of dogs on wildlife
- Developer tactics / “planning blight”?
- Too many caravans and mobile homes
- Creation of “Shopping Mall” at Drove Orchards
- Traffic volumes increasing (indirect development impact)
- Road safety - Speeding cars, parking, lack of footpaths / safe pedestrian routes
- Cars parking everywhere – especially in tourist season
- Water pollution
- Flooding

## 12 APPENDIX 5: COMMUNITY FEEDBACK - JANUARY 2017 CONSULTATION

**HOLME-NEXT-THE-SEA PARISH COUNCIL**

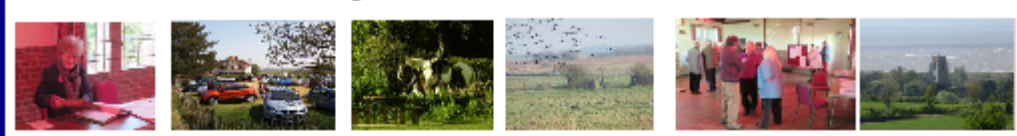


**NEIGHBOURHOOD PLAN UPDATE**

Following the results of the Questionnaire last year and the Presentation Day in January it became clear that the 'big issues' for the Holme-next-the-Sea Neighbourhood Plan were the environmental impact of *inappropriate* development as well as excessive growth in second homes and the replacement of modest homes by top end properties. Holme-next-the-Sea has an exceptional natural environment but there are issues to be addressed -

- ✦ 42% of the Parish has environmental protection under current legislation.
- ✦ The whole of the Parish is located within the boundary of the Area of Outstanding Natural Beauty.
- ✦ Ever increasing visitor numbers mostly arriving by car.
- ✦ Shoreline management and the effects of climate change.

Obtaining the evidence to deliver a Neighbourhood Plan which meets local aspirations as well as the Government's National Planning Policy Framework objectives for Sustainable Development has proved much more time consuming than originally anticipated. Meetings have been held with a number of local and national organisations including Natural England, the Environment Agency, Norfolk Coast Partnership, Norfolk Wildlife Trust and Norfolk Rivers Trust as well as Norfolk County Council and the Borough of King's Lynn and West Norfolk Planning and Housing Strategy Departments. Meetings have also been held with some of the larger landowners in the area.



Significant progress has been made over the last six months with Draft Policies for the Neighbourhood Plan now being formulated ready for comment and consideration by parishioners at the next Consultation Day. This will be held before the end of the year with details to be announced shortly. As before it will be held in the Village Hall, so do find the time to come along and .....

**HAVE YOUR SAY!!**

Any queries, please contact the Project Co-ordinator, Christina Jones – Tel: 01485 535065 or  
Email: [hnts4ndp@outlook.com](mailto:hnts4ndp@outlook.com)



### 13 APPENDIX 6: RECORD OF CONSULTATION MEETINGS

LANDOWNER / ORGANISATION	DATE	CONTACT	MEETING ATTENDANCE	OUTCOMES
BOROUGH COUNCIL OF KING'S LYNN & WEST NORFOLK ( <i>Planning Policy Team</i> ).	17.11.16.	Meeting	Alan Gomm Alex Fradley NDP Team	<ul style="list-style-type: none"> <li>▫ BCKLWN indicated it did not anticipate any significant increase in development in HNTS due to status as 'Small Village or Hamlet' and the environmental issues.</li> <li>▫ Discussion of development boundaries vs criteria-based policies.</li> <li>▫ Imbalance of housing stock partly resulting from large replacement dwellings could be controlled by policies.</li> <li>▫ Discussion of self build schemes and housing needs.</li> <li>▫ Approach to the expansion of Drove Orchards discussed.</li> <li>▫ Issues raised regarding conflicts between NDP and Local Plan.</li> <li>▫ Call for Sites implications considered.</li> <li>▫ SEA requirement responsibilities indicated.</li> <li>▫ Arrangements made for information and data sharing.</li> <li>▫ Funding support established.</li> </ul>
BOROUGH COUNCIL OF KING'S LYNN & WEST NORFOLK ( <i>Planning Policy Team</i> ).	04.07.17.	Meeting	Alan Gomm Felix Beck NDP Team	<ul style="list-style-type: none"> <li>▫ Proposed Zoning accepted as a concept for development control.</li> <li>▫ Discussion of Development Boundary including Flood Risk. Green Spaces, Backland and impact of policies DM2 and DM3.</li> <li>▫ Call for Sites applications, analysis and assessment to be included in NDP.</li> <li>▫ Safeguarding for Protected Sites.</li> <li>▫ System of control for Rural Exception Site.</li> <li>▫ Potential for 'Amenity Zone' and difficulties of Environment Centre concept.</li> <li>▫ Support for NDP direction generally.</li> <li>▫ Agreement for further meeting with draft policies before next consultation.</li> </ul>
BOROUGH COUNCIL OF KING'S LYNN & WEST NORFOLK ( <i>Planning Policy Team</i> ).	22.09.17.	Meeting	Alan Gomm Felix Beck NDP Team Margaret Easton	<ul style="list-style-type: none"> <li>▫ Feedback on proposed Zoning and Development Boundary.</li> <li>▫ SVAH boundaries and BC proposals for development adjacent to boundaries.</li> <li>▫ Proposals for housing and site assessments in HNTS.</li> <li>▫ Conservation Area Policy within NDP.</li> </ul>

BOROUGH COUNCIL OF KING'S LYNN & WEST NORFOLK ( <i>Planning Policy Team</i> ).	12.12.17.	Meeting	Alan Gomm Felix Beck NDP Team	<ul style="list-style-type: none"> <li>▫ BC feedback on proposed allocation sites and draft letter to landowners.</li> <li>▫ Review of draft policies for public consultation on 4th January 2018.</li> <li>▫ Development Management feedback on draft policies to be sought</li> </ul>
BOROUGH COUNCIL OF KING'S LYNN & WEST NORFOLK ( <i>Planning Policy Team</i> ).	30.05.18.	Meeting	Alan Gomm Felix Beck NDP Team	<ul style="list-style-type: none"> <li>▫ Update and feedback on draft policies and future requirements.</li> </ul>
BOROUGH COUNCIL OF KING'S LYNN & WEST NORFOLK ( <i>Planning Policy Team</i> ).	07.05.19	Meeting	Alan Gomm Alex Fradley NDP Team	<ul style="list-style-type: none"> <li>▫ Review changes and updates to draft plan since 2018 consultation</li> <li>▫ Including comments made by Development Management</li> <li>▫ Request from DM for Countryside Zone agreed</li> <li>▫ BC happy with new nomenclature</li> <li>▫ Request to move Vision &amp; Objectives to Part B</li> <li>▫ Review of agreed actions</li> <li>▫ SEA screening to proceed (SEA probably not needed given policy balance; views of statutory consultees crucial)</li> </ul>
BOROUGH COUNCIL OF KING'S LYNN & WEST NORFOLK ( <i>Planning Policy Team</i> ).	21.08.19	Meeting	Alan Gomm Alex Fradley Katie Evans NDP Team	<ul style="list-style-type: none"> <li>▫ Review of BC feedback on pre-submission draft plan</li> <li>▫ Discussion of site allocation</li> <li>▫ Review of Regulation 14 feedback</li> <li>▫ Agreement on approach to dealing with 3 strong developer objections</li> <li>▫ Review and support for Principal Homes Policy – Allocation won't meet plan objectives without one</li> </ul>
NORFOLK COUNTY COUNCIL	06.12.16.	Meeting	David White NDP Team	<ul style="list-style-type: none"> <li>▫ Request for recent visitor number data relating to Norfolk Wildlife Trust Reserve at Holme Dunes.</li> <li>▫ Suggestion to extend / reinforce footpath network to dissipate pressures on protected sites.</li> </ul>
NORFOLK WILDLIFE TRUST	16.12.16.	Meeting	John Hiskitt Gary Hibberd Robert Burton Maxine Hayes	<ul style="list-style-type: none"> <li>▫ Draft plans for expansion of Visitor Centre and Visitor Number Data to be forwarded by NWT.</li> <li>▫ Discussion of changes to visitor profile and increased use of car park / Visitor Centre in connection with beach proximity.</li> </ul>

			NDP Team	<ul style="list-style-type: none"> <li>▫ Air pollution statistics, Reserve access track condition and light pollution from large new developments were discussed.</li> <li>▫ Suggestion to contact Euro Marine Site Officer regarding protection of beaches.</li> <li>▫ Indication of suggested policies for inclusion in NDP.</li> </ul>
LORD PETER MELCHETT	13.01.17.	Meeting	Peter Melchett NDP Team	<ul style="list-style-type: none"> <li>▫ Clarification of Peter Melchett's land ownership.</li> <li>▫ Discussion of potential impact of Shoreline Management Plan.</li> <li>▫ Future aspiration for land as area of peace and tranquillity with only pedestrian access.</li> </ul>
ENVIRONMENT AGENCY	08.02.17.	Meeting	Gary Watson NDP Team	<ul style="list-style-type: none"> <li>▫ Discussion of potential impact of Shoreline Management Plan.</li> <li>▫ Clarification of intention of policies within the Shoreline Management Plan.</li> <li>▫ Agreement of wording for relevant section of Neighbourhood Plan for accuracy of definition.</li> </ul>
ENVIRONMENT AGENCY  (NOA, NWT, NCC, BC)	07.01.19.	Meeting	Sophie Barker Gary Hibberd Len Simmons Gary Watson Hannah Borrett Alan Gomm NDP Team	<ul style="list-style-type: none"> <li>▫ Follow-up to ENDURE Project Workshop on Dune Resilience at Sheringham in November 2018.</li> <li>▫ Site visit to 'Dragon's Tooth' sea defences. EA confirmed could do nothing further.</li> <li>▫ BD LIDAR imagery illustrated points of weakness in the West.</li> <li>▫ GW suggested geophysical assessment of changes to dunes by specialist working for NE.</li> <li>▫ ENDURE has funding for experimental and innovative resilience measures.</li> <li>▫ EA confirmed that any approach to prolong the lifetime of the dunes would be considered so long as it was consistent with SMP.</li> </ul>
NORFOLK COAST PARTNERSHIP	14.02.17.	Meeting	Estelle Hook Robert Burton NDP Team	<ul style="list-style-type: none"> <li>▫ Outline of proposed River Hun Project and agreement for support.</li> <li>▫ Co-operation on approach to NDP water quality and testing.</li> <li>▫ Discussion of potential impact of Shoreline Management Plan.</li> <li>▫ Concerns regarding increased recreational pressure agreed.</li> </ul>
NCP/EA Hunstory	07.02.18.	Meeting	Estelle Hook Sophie Barker Peter Bangs Steve Newman	<ul style="list-style-type: none"> <li>▫ EH gave background to NCP and Hunstory project. LSD provided update on NDP and water quality testing</li> <li>▫ Considerable concerns raised and discussed concerning project - proposal, map, river modelling, footpaths, biodiversity, project aim and stated outcomes, community involvement to date.</li> </ul>

			Robin Jolliffe NDP Team	<ul style="list-style-type: none"> <li>□ Environment issues explored - water quality, public access, water flow.</li> <li>□ Links to other plans queried - Shoreline Management Plan, River Hun de-maining, transfer to Internal Drainage Board, EA River Hun Water Framework Directive.</li> <li>□ Clarification of roles of project partners and legality of Partners Agreement.</li> <li>□ Agreed EH would circulate concept document and project summary by end of February.</li> <li>□ Meeting to be arrange for mid-March for outstanding issues to be aired by interested parties.</li> </ul>
NCP/EA Hunstony	23.03.18.	Meeting	Sophie Barker Steve Newman Martin Crown Robert Burton Estelle Hook David Mills Chris Strachen Gemma Clark Andrew Jamieson Charles Coker NDP Team	<ul style="list-style-type: none"> <li>□ EH gave overview of NCP, Heritage Lottery Fund application and Hunstony project including stakeholder involvement, matched funding and Partnership Agreements.</li> <li>□ NDP Team provided presentation on progress</li> <li>□ Detailed discussion of project scope including footpaths, water levels, apprenticeships, river profile, improved access and pollution.</li> <li>□ Considerable concerns were raised including lack of community involvement to date, improved access and visitor number pressures, potential link to the SMP, little importance being attached to water quality, suggestion that biodiversity is currently low, and reference to protected sites.</li> <li>□ EH gave a review of a Costing Spreadsheet.</li> <li>□ Agreed: <ul style="list-style-type: none"> <li>- application needs editing and requires background information.</li> <li>- fundamental changes required and major issues need to be addressed to secure support.</li> <li>- management of visitors is essential.</li> <li>- NOA is supportive of projects generally and would welcome an opportunity for discussion.</li> <li>- EH will arrange a community event.</li> <li>- New draft proposal to be circulated by mid-April with the possibility of a further meeting for stakeholders.</li> </ul> </li> </ul>
NCP Hunstony stakeholder	13.02.19.	Meeting	Estelle Hook	<ul style="list-style-type: none"> <li>□ JM opposed to changes to water levels on his land.</li> <li>□ NWT rejected idea of enlarge scheme routing river through Broadwater.</li> </ul>

management group			Helen Timson Jonah Tosney Nick Torry Jay Melchett NDP Team	<ul style="list-style-type: none"> <li>□ Biodiversity issues raised.</li> <li>□ BD and IDB indicated scheme would require Environmental Impact Assessment and Habitat Regulations Assessment.</li> </ul>
NORFOLK COAST PARTNERSHIP & NORFOLK RIVERS TRUST	04.02.19.	Meeting	Ursula Juta Helen Timson NDP Team	<ul style="list-style-type: none"> <li>□ Discussion of additional water sampling and possible alternatives.</li> <li>□ Information regarding UEA student projects.</li> <li>□ Aims of Feasibility Study and dune erosion.</li> <li>□ Proposed meeting on 13.02.19. with landowners and Richard Hey.</li> </ul>
GEOFFREY RENAUT	22.03.17.	Meeting	Geoffrey Renaut Kevin Felgate NDP Team	<ul style="list-style-type: none"> <li>□ Clarification of Geoffrey Renaut's land ownership and recent sales.</li> <li>□ Discussion of Wildlife Stewardship Schemes and footpath development.</li> <li>□ Indication of potential development site.</li> </ul>
GEOFFREY RENAUT	06.09.18.	Meeting A  Meeting B	NDP Team Geoffrey Renaut  <i>NDP team in the absence of Geoffrey Renaut</i>	<ul style="list-style-type: none"> <li>□ Discussion of Housing Policy.</li> <li>□ Development potential and conformity with other proposed NDP policies.</li> <li>□ Update on landscape and biodiversity report.</li> <li>□ Possible need for 'Overlooking' Policy resulting from recent Planning Application in Aslack Way.</li> <li>□ Update on BC feedback on Drove Orchards Policy.</li> <li>□ Considerable discussion of SEA and HRA requirements and potential funding.</li> <li>□ Agreed RH would construct an email to BCKLWN for LD/BD suggesting BD carry out the Assessments in order to speed the process.</li> </ul>
ANDREW JAMIESON  Drove Orchards	22.03.17.	Meeting	Andrew Jamieson NDP Team	<ul style="list-style-type: none"> <li>□ Clarification of Andrew Jamieson's land ownership.</li> <li>□ Discussion of potential impact of Shoreline Management Plan.</li> <li>□ Indication of potential future development at Drove Orchards.</li> <li>□ Already supports biodiversity networks / wildlife corridors and Wildlife Stewardship Schemes.</li> <li>□ Potential support for Environment Centre but not housing development.</li> <li>□ Indication of potential land 'exchange'.</li> </ul>

ANDREW JAMIESON Norfolk County Council	27.10.17	Meeting	Andrew Jamieson NDP Team	<ul style="list-style-type: none"> <li>▫ NDP update.</li> <li>▫ Discussions of Footpath Network, Shoreline Management Plan and Flood Risk Management. AJ to investigate timetable for review and revision of flood maps for EA.</li> <li>▫ Concerns regarding Norfolk Coast Partnership project for the River Hun raised and water sampling results discussed. AJ to find out about sewage capacity for major new developments in Hunstanton.</li> <li>▫ AJ to investigate the possibility of a meeting with significant landowners.</li> </ul>
STEPHEN BETTS	05.04.17. 30.08.17.	Letter Letter		<ul style="list-style-type: none"> <li>▫ Telephone message that he has no interest in discussing footpath to Drove Orchards and suggested speaking to Mr. Renaut regarding the north side of the road.</li> </ul>
ANDREW MARTIN-SMITH	05.04.17.			<ul style="list-style-type: none"> <li>▫ Responded would like to take part in consultation and telephone message left as to possible dates which did not lead to a meeting.</li> </ul>
	30.08.17.			<ul style="list-style-type: none"> <li>▫ Request for a meeting.</li> </ul>
	19.10.17.		NDP Team	<ul style="list-style-type: none"> <li>▫ Clarification of land ownership.</li> <li>▫ Discussion of impact of SMP.</li> <li>▫ Indication of potential footpath to link to Peddars Way National Trail.</li> <li>▫ Potential support for Environment Centre and / or possible development.</li> </ul>
DAVID GORTON	10.04.17.	Letter		<ul style="list-style-type: none"> <li>▫ No response</li> </ul>
GILL DAVIES	10.04.17.	Letter		<ul style="list-style-type: none"> <li>▫ Responded that had no knowledge of NDP and would like to meet but sometime in June at the earliest.</li> </ul>
	30.08.17.	Letter		<ul style="list-style-type: none"> <li>▫ No response.</li> </ul>
BERNIE CROWN	10.04.17.	Letter		<ul style="list-style-type: none"> <li>▫ No response.</li> </ul>
PREMCHECK	15.04.17.	Letter		<ul style="list-style-type: none"> <li>▫ No response.</li> </ul>
NATURAL ENGLAND	16.06.17.	Meeting	Tamara Rowson Victoria White NDP Team	<ul style="list-style-type: none"> <li>▫ HNTS NDP background discussed.</li> <li>▫ NE views on, and explanations of, process for development adjacent to protected sites.</li> <li>▫ Visitor pressure explored and possible Environment Centre and Amenity Zone</li> </ul>

				<p>supported.</p> <ul style="list-style-type: none"> <li>▫ Agreed exclusion of Flood Zones 2 &amp; 3 from Development Boundary.</li> <li>▫ Implications of SMP, Climate change and River Hun changes explored.</li> <li>▫ Various policies suggested for NDP.</li> </ul>
NATURAL ENGLAND	30.10.17.	Meeting	Debbie Gosman Victoria Wight NDP Team	<ul style="list-style-type: none"> <li>▫ Overview of NE structure, roles and responsibilities.</li> <li>▫ HNTS NDP drivers, community aspirations and vision / objectives.</li> <li>▫ HNTS NDP issues - Shoreline Management Plan, compensating habitat sites and flood risk.</li> <li>▫ Norfolk Coast Partnership Hun Project and water quality monitoring results.</li> <li>▫ HNTS visitor pressure and growth in visitor number concerns together with access and parking issues.</li> <li>▫ Conservation impacts and ecosystem services.</li> <li>▫ Update on HNTS NDP progress with NE very supportive.</li> </ul>
NATURAL ENGLAND and NORFOLK COAST PARTNERSHIP. (including meetings with NOA and NWT wardens)	01.12.17.	1 day Site Visit	Estelle Hook Debbie Gosman Scott Hardy NDP Team	<ul style="list-style-type: none"> <li>▫ Extensive site visit to important areas of the Parish helpful to EH, DG and SH employed by NE to do North Norfolk Coast Report.</li> <li>▫ Discussion of DG report which could be used as evidence base in support of policies.</li> <li>▫ Wide ranging discussion of recreational impacts and mitigation systems.</li> <li>▫ Mitigation Funding and NCP Hunstony Project explored.</li> <li>▫ NE offered any support available.</li> </ul>
BOROUGH COUNCIL OF KING'S LYNN & WEST NORFOLK ( <i>HOUSING STRATEGY TEAM</i> )	26.07.17.	Meeting	Nikki Patten Karl Patterson NDP Team	<ul style="list-style-type: none"> <li>▫ Discussion of approach to housing need in HNTS from BCKLWN data and developer survey.</li> <li>▫ Advice on Rural Exception Policy regulations.</li> <li>▫ Second Home calculations, Housing Stock data and future development requirements explored.</li> <li>▫ Discussion of Principal Homes Policy and impact of restrictive criteria.</li> <li>▫ Scope for, and definition of, Affordable Homes.</li> <li>▫ Confirmed minimal chance of and Affordable Housing locating in Holme due to lack of facilities. No demand.</li> <li>▫ CIL implementation outlined.</li> </ul>
NORFOLK ORNITHOLOGICAL	15.03.18.	Meeting	Sophie Barker	<ul style="list-style-type: none"> <li>▫ Discussion of relevant NDP issues - Development Envelope, Shoreline Management Plan, housing needs and capacity assessment, biodiversity and</li> </ul>

ASSOCIATION			Steve Newman Peter Bangs NDP Team	<ul style="list-style-type: none"> <li>▫ protected sites.</li> <li>▫ Discussion of NCP Hunstony Project and mutual points of concern.</li> </ul>
ANGLIAN WATER	05.12.18.	Meeting	Stewart Patience NDP Team	<ul style="list-style-type: none"> <li>▫ HNTS NDP key points explained.</li> <li>▫ River Hun catchment issues explored.</li> <li>▫ Water Quality concerns including sewage release discussed.</li> <li>▫ Impact of Shoreline Management Plan explained and Hunstony concerns raised.</li> <li>▫ SP was working on wording of NDP teams draft policies for Water Resources and Waste Water Disposal.</li> <li>▫ SP offered any support he could give - AW had already produced an NDP Planning Guide.</li> </ul>
OLD HUNSTANTON Parish Council	04.02.19.	Meeting	David McLeod Stuart Parry Lynne Butters NDP team	<ul style="list-style-type: none"> <li>▫ Discussion of OH Questionnaire and analysis.</li> <li>▫ Information of HNTS meetings, areas of concern and timescale.</li> <li>▫ OH aims - buffer zones, second homes, principle residency, house size and footprint specifically.</li> <li>▫ Hunstony project - common issues discussed</li> <li>▫ Agreed liaison had been helpful and should be continued.</li> </ul>

Neighbourhood Development Plan Team: Lynn Devereux, Bernard Devereux, Gill Morley, Bob Bowman, Christina Jones, Senior Planning Adviser

Holme-next-the-Sea Parish Councillors: Kevin Felgate, Lynn Devereux, Gill Morley, Martin Crown, Robert Burton, Geoffrey Needham, Margaret Easton.



## **14 APPENDIX 7: LETTER TO OWNERS OF PROPOSED ALLOCATION SITES**

Dear X,

### **Holme next the Sea Neighbourhood Plan Consultation Event – 4<sup>th</sup> January 2018**

I am writing to you either because you responded to the Call for Sites issued by the Borough Council in connection with the Local Plan Review or because you are believed to be the owner of a piece of land that has been proposed through the Neighbourhood Plan consultations as a possible site for development.

At the forthcoming Neighbourhood Plan consultation event we will be seeking the views of the Parish on draft policies and proposals that have come forward for development sites. In order to help people form a view we would like to provide some basic information describing the sites and if you have no objection we will include the attached description/ map of your land for these purposes.

I would be grateful if you would confirm that the information is correct and that you are happy for us to proceed. If you would like to attend the consultation event, you will be very welcome. The exhibition will be open from 2pm – 7pm and refreshments will be available in aid of the Village Hall.

Kind Regards

Yours sincerely,

Christina Jones

## 15 APPENDIX 8: INITIAL DRAFT POLICIES (JANUARY 2018)

### GEN # Principle of sustainable development in Holme-next-the-Sea

**Policy:** The Neighbourhood Plan will adopt a positive approach to sustainable development and development proposals will be supported where they are consistent with this principle and they accord with the other policies of the Neighbourhood Plan, the Local Plan and the NPPF, and in particular where they

- (i) contribute to economic and social vitality of the Parish's resident community
- (ii) respect the natural capital and ecosystem services generated by the Parish
- (iii) have due regard to the status of the AONB where great weight should be given to conserving landscape and scenic beauty (NPPF para 115, CROW Act 2000) and where the conservation of wildlife and cultural heritage are important considerations
- (iv) can demonstrate a neutral or positive impact on the designated sites taking account of the cumulative impacts of incremental development and
- (v) promote resilience to climate change, sea level rise and flood risk

Development proposals will not be supported where they fail to conserve the landscape, natural beauty, wildlife, cultural heritage and designated sites unless exceptionally the benefits of the proposed development can be demonstrated to outweigh the great weight attached to these assets.

### ZON # Settlement Zone

**Policy:** Within the Village **Development Envelope** new infill development within gaps between or adjacent to existing dwellings and fronting onto the existing road network will be permitted provided that it conforms to the other policies of the NDP and the Local Plan.

In order to protect the form and character of the settlement, neighbouring amenity and privacy, and to promote biodiversity, development will be permitted within the **Garden Land** policy area only where it is consistent with the Local Plan, other policies in this plan and existing permitted development rights.

Appropriate development will be permitted in the **Managed Coastal Change** policy area provided that it does not increase direct or indirect exposure to flood risk or impact negatively on sensitive conservation sites, protected species or the AONB setting. Appropriate development is that which facilitates adaptation and resilience to climate change and flooding against the background of The Shoreline Management Plan policies and does not impact negatively on the Protected Sites. It may include extensions to or replacement of existing dwellings subject to other policies in the NDP (Soc # Replacement Dwellings; Soc # Extensions to existing dwellings, Annexes and Outbuildings) or Local Plan and provided they satisfy EA, LPA and NPPF provisions with respect to flood risk.

Development of new infrastructure will be permitted where it is necessary to protect existing properties. Such development must demonstrate that any negative effects on protected habitats and wildlife and the AONB landscape are minimised.

## ZON # Protected Sites

**Policy:** Development will only be permitted in the Protected Sites Zone where it maintains the value of the Parish's natural capital and contributes directly to one or more of the objectives listed in this policy for conserving and improving habitats, wildlife, biodiversity and protected species, including those set out in the Zone's various designations. Priorities are:

- (i) Dissipating visitor pressure
- (ii) Retaining a sense of peace, tranquillity and wilderness
- (iii) Reducing traffic and car parking whilst facilitating access for disabled visitors
- (iv) Encouraging walking patterns that avoid sensitive habitats and conflict with wildlife
- (v) Ensuring all forms of pollution are minimised (air, water, noise and light)
- (vi) Maintaining the associated amenity for the benefit of the Parish and the wider community
- (vii) Maintaining ecosystem services for the benefit of the Parish, the local economy and the wider community

Development proposals which may impact on the Protected Sites will be subject to a Habitats Regulations Assessment to determine any potentially significant effects. Where such effects may occur they will be subject to Appropriate Assessment. Proposals that will result in any adverse effects will be refused unless there are imperative reasons of overriding public interest why the proposals should proceed and adequate compensatory provision has been secured for the benefit of the Parish.

## ZON # SMP Adaptation and Resilience Zone

**Policy:** Where it is consistent with the priorities set out in this policy and subject to other NDP policies, development related to agriculture and low-key recreation will be permitted in the Shoreline Management Plan Adaptation and Resilience Zone for:

- (i) Small buildings needed to support low intensity, sustainable agriculture
- (ii) Visitor information points, bird hides shelters and secure cycle stands
- (iii) Schemes for effective management of water resources
- (iv) Creation of water related habitats including small lakes and reservoirs
- (v) Limited car parking for disabled visitors and for drop-off purposes at access and information points on the edges of the zone

Priorities include maintaining uninterrupted views of the AONB countryside and coast, unspoiled views of the Dark Night Skies, improving biodiversity and creating a peaceful and tranquil environment that will improve Parish amenity and attract visitors thereby helping to reduce pressures on the Protected Sites. There is no public access for cars within this zone and development which would introduce additional visitor traffic will not be permitted.

## ZON # Drove Orchards – Mixed Use Zone (Agriculture / Retail / Employment / Tourism)

**Policy:** New development at Drove Orchards will be permitted where it is directly related to the agricultural use of the site or is for tourism related uses which are compatible with and related to the special characteristics of the AONB and the important habitats of the North Norfolk Coast.

Any retail uses which are permitted will be subject to a condition to restrict permitted development rights for changes to retail uses that are not directly related to the agricultural use of the site.

All proposals for new development on the site will be required to demonstrate:

- (i) that they will not be harmful to the special character of the AONB
- (ii) the scale of new buildings is such that they are not visually intrusive and that the materials used respect the character of the area
- (iii) that there will be sufficient car parking on the site and that the volume of traffic generated would not interrupt the free flow of vehicles on the A149 Corridor of Movement or impact negatively on highway safety.

## Policy ECON # Natural Capital and Ecosystem Services

**Policy:** Development proposals must have an overall positive or neutral impact on natural capital and should contribute positively to, or at least maintain, the ability of the natural environment to provide those goods and services which underpin the parish economy. A complete list of these services is set out in the National Character Area Profiles published by Natural England (NCA Profiles 76: North West Norfolk and 77: North Norfolk Coast). Of particular importance to the Parish in this respect are those described as being of national and / or regional importance including the following:

- I. Sense of place / inspiration
- II. Tranquillity
- III. Sense of history
- IV. Recreation (including health and well-being)
- V. Biodiversity
- VI. Geodiversity
- VII. Water quality, flow and availability
- VIII. Food provision
- IX. Regulating coastal erosion and flooding

In order to ensure that the environment can continue to drive a thriving economy, development proposals must demonstrate that, having regard to all of the following objectives, positive contributions outweigh or at least balance any negative effects:

- I. Preserve and enhance the sense of tranquillity and wilderness, the wide open spaces, dark skies and panoramic views of the AONB landscape and internationally important seascapes
- II. Conserve, manage and increase understanding of Holme's rich archaeological, historical and cultural heritage
- III. Reduce the pressures associated with high visitor numbers to the village, beach, Holme Dunes National Nature Reserve and the Protected Sites
- IV. Maintain and enhance the role of the parish as a place for the promotion of health and well-being
- V. Conserve and extend the parish's internationally important landforms and wildlife habitats and increase levels of biodiversity that they support
- VI. Strengthen the corridors that support the movement of wildlife and improve connections between areas of high biodiversity to enhance the overall network of wildlife habitats
- VII. Manage water resources sustainably by conserving supplies and improving quality
- VIII. Conserve and enhance soils and extend sustainable food production methods whilst taking opportunities to contribute to wildlife and conservation
- IX. Manage the risk of flooding whilst improving resilience to climate change and mitigation of the associated effects
- X. Reduce levels of air, water and noise pollution
- XI. Encourage travel by sustainable modes and reduce demand for car parking and travel by car.

Small changes in land use may appear inconsequential but through time, the cumulative effects of incremental change can have significant impacts (positive or negative) and these should be identified and assessed for all development.

## Policy ECON # Sustainable Tourism

**Policy:** Proposals for small-scale, low-key recreational facilities which provide opportunities for increased appreciation and awareness of the special features of the AONB landscape and the natural and cultural heritage of the parish will be supported provided that they:

- (i) Do not detract from the character of the area or its natural and cultural heritage assets
- (ii) Do not impact negatively on the amenity of the area or the enjoyment of residents and visitors who come to Holme to experience the peace, tranquillity and AONB landscape and / or the wildlife found throughout the Parish

And wherever possible

- (iii) Are located on the network of footpaths and bridleways
- (iv) Encourage access by sustainable modes of travel and do not substantially increase overall traffic or car parking with the exception of that required for disabled visitors
- (v) Add value to ecosystem services

**Policy:** Proposals for equestrian development should satisfy the following criteria:

- (i) Have good vehicle access from / to the existing transport network, respecting the constraints imposed by narrow village roads which are shared by pedestrians
- (ii) Are well-located in relation to existing tracks and bridleways
- (iii) Employ the highest standards of design which reflect local character and distinctiveness and blend well into the AONB landscape
- (iv) Are on a scale which in terms of both physical size and intensity of use is compatible with the setting and respects neighbouring amenity

### **Policy ENV DC # Overall Form and Pattern of Settlement**

**Policy:** With the exception of any specific allocations made through the Neighbourhood Plan, development will take the form of infill. It should follow the distinctive grain and pattern of settlement which is predominantly linear with buildings facing the road. It should also maintain the features that contribute to the characteristic form of Holme including the open spaces in the central part of the village and the far-reaching views towards and from the margins.

### **Policy ENV DC # Street Scene and Character**

**Policy:** Development proposals will be expected to satisfy all of the following requirements:

- I. Demonstrate an informed appreciation of landscape context
- II. Provide appropriate separation from plot boundaries so as to maintain gaps which provide a positive contribution to the street scene and avoid a cramped or urbanized appearance
- III. Have regard for the relationship between building size and plot size which should respect that of nearby properties
- IV. Employ design which is appropriate and sympathetic to its setting in terms of height, massing, roof form, materials, elevational and vernacular detailing
- V. Respect established building set back and arrangements of front gardens and boundary treatments including hedges, trees, walls, fences and railings
- VI. Garages must not be intrusive on the street scene, should remain subordinate to and not detract from the character and appearance of the main dwelling
- VII. The palette of building materials and external finishes should be selected to complement and enhance locally distinctive character which includes chalk, carrstone, flint, rubble and clay pantiles
- VIII. Development sites should be accessed directly from a suitable existing road on at least one boundary and access arrangements should have particular regard for the visibility and safety of pedestrians and cyclists.

### **Policy ENV HE # Conservation Area Policy**

**Policy:** Proposals for development within the Conservation Area or within the setting of the Conservation Area must respect the particular features which contribute to its character and appearance, particularly those of historic or architectural interest shown on the Heritage Map. They must have particular regard for the following:

- I. Holme-next-the-Sea Conservation Area Draft Character Statement
- II. The effect of the proposal on the significance of any designated or non-designated heritage assets shown on the NDP Heritage and Conservation Area Maps including both listed and important unlisted buildings
- III. The overall layout of settlement and its relationship to the surrounding AONB landscape including the boundaries with the Protected Sites of Holme Marsh and Redwell Marsh
- IV. The historic pattern of roads, footpaths, by-ways and open spaces that characterise the settlement and contribute to the established street scene
- V. The mix of building types, scale height and massing
- VI. Roof lines and styles and any historic elevation features including windows
- VII. The use of locally distinctive building materials, styles and techniques
- VIII. Significant landscape features including established trees and hedgerows, boundary treatments, ponds and open spaces
- IX. Existing views and vistas including views of the skyline and views into and out of the Conservation Area

All proposals should identify opportunities for enhancements to the Conservation Area and should be supported by sufficiently detailed information to allow an informed assessment of any impacts to be made. Outline planning applications will not be acceptable in the Conservation Area.

## **Policy ENV HE # Heritage Assets**

**Policy:** Development proposals should preserve and enhance the significance of heritage assets and respect their setting. The Parish has a rich natural and cultural heritage and where consistent with the conservation of heritage assets, opportunities for linking these to the significant recreational opportunities offered by the AONB landscape should be taken. Of particular value in this respect are the opportunities presented by the existing and proposed footpath network that crosses the Parish and includes the Peddars Way / National Trail as well as other historic routes, tracks and banks. These and other important local features are shown on the Heritage and Archaeology Map included in this Plan.

Prospective developers should consult this Map together with any additional information provided in the Norfolk Historic Environment Record. Where there is an indication or potential that there may be assets of heritage or archaeological interest, suitable desk-based and site investigation should be carried out following recognised professional practices and where appropriate, the historic record should be updated to reflect the result. Where historic assets are revealed or discovered, every opportunity should be taken to make them more accessible to the public.

## **Policy ENV NE # Biodiversity**

**Policy:** Development proposals will be required where appropriate to contribute to the conservation and enhancement of biodiversity as an integral part of their design scheme. This means:

- I. Identifying, protecting and enhancing key habitat features including trees, shrubs, waterbodies and corridors of movement for wildlife, especially hedges and verges.
- II. Replacing and extending the above features when they are damaged or lost as a result of development. Where this cannot be achieved on site the Parish Council will assist in identifying suitable, alternative replacement locations.
- III. Taking opportunities to improve continuity along hedgerows and between trees by appropriate planting in gaps to create safe corridors of movement with good continuity and cover for wildlife moving through the landscape.
- IV. Designing planting schemes that integrate into the existing network of hedgerows and wooded corridors in the wider landscape surrounding the site in order to reduce fragmentation of habitats for wildlife.
- V. Identifying opportunities for improving biodiversity by creating new habitat patches however small and by incorporating planting that provides sources of food for wildlife – especially migratory bird species.
- VI. Appreciating the likelihood of encountering protected and priority species in the Parish and checking for their presence. Where this is likely, getting professional advice to enable development to proceed with the necessary permissions and without damage to habitats or numbers.
- VII. Scheduling projects to avoid peak nesting and breeding times where possible.
- VIII. Having regard for the presence of invasive species and where found, taking appropriate measures for eradication or control. Taking care not to import invasive species whilst landscaping – especially when working or planting in ponds and watercourses.

### **Policy ENV NE # Pollution**

**Policy:** Development proposals that might result in increased levels of air, dust, noise, vibration, light, water, odour, chemical or other pollution will be required to demonstrate that after mitigation they do not have a significant negative effect on people, the natural environment or the ability to deliver ecosystem services now or in the foreseeable future, taking into account cumulative impacts.

Development must follow best practice methods to reduce dust and other pollutants arising from development activities. Developers will be required to ensure that all waste will be removed and disposed of safely and responsibly.

### **Policy ENV NE # Water Quality and Quantity**



**Policy:** Development proposals that affect groundwater, the River Hun, ditches and ponds throughout the Parish will only be permitted if they conserve and enhance the following:

- I. Water quality and quantity, and help meet the requirements of the European Water Framework Directive, or its replacement.
- II. The ability of groundwater, surface water features and watercourse corridors to function by natural processes taking account of seasonal variations, within the immediate vicinity, and both upstream and downstream of the site of the proposal;
- III. The ability of groundwater to meet current and projected levels of demand for abstraction and water supply
- IV. Biodiversity including fish, aquatic and other water dependent species
- V. Character, appearance, setting and historic significance
- VI. Recreational value alongside the water feature where the public have access
- VII. Suitable maintenance access to the water feature including for flood risk management

Where appropriate proposals should incorporate the following:

- I. Clear arrangements for sustainable drainage
- II. Use of permeable surfaces, rainwater harvesting and storage
- III. Methods to control and attenuate greenfield surface water runoff within the development site
- IV. Where connection to existing mains sewers is not practical, planning conditions will be imposed requiring the use of package treatment systems that offer best available processing to minimise discharges of nitrogen and phosphorous into the local water environment
- V. Proposals involving storage of slurry, agricultural fuel oil, fertilisers and other potential pollutants must clearly demonstrate compliance with all design and safety procedures necessary to prevent risk of discharge into the water environment.

## **Policy ENV NE # Tranquillity**

**Policy:** Development proposals should conserve and enhance the tranquillity of the AONB setting of the Parish and should consider the following impacts:

- (i) Direct impacts resulting from changes to the visual and aural environment in the immediate setting of the development which may intrude, distract or disturb
- (ii) Indirect or secondary impacts caused beyond the site of the proposed development such as those associated with traffic, car parking or longer distance views of the landscape
- (iii) Cumulative impacts of incremental development

## Policy ENV NE # Dark Skies

**Policy:** National Planning Policy Framework Clause 125 and Norfolk County Council's Environmental Lighting Zones Policy both recognise the importance of preserving dark landscapes and dark skies. In order to minimise light pollution any outdoor lights associated with new development or changes in land use will be specified through the following conditions appended to notices of planning approval.

Outdoor lighting should meet the following conditions:

- (i) Fully shielded (enclosed in full cut-off flat glass fitments)
- (ii) Directed downwards (mounted horizontally to the ground and not tilted upwards)
- (iii) No dusk to dawn lamps
- (iv) White light low-energy lamps (LED, metal halide or fluorescent) and not orange or pink sodium sources

## Policy ENV NE # Protection of Views

**Policy:** Development proposals will only be permitted where they preserve the visual integrity, identity and scenic quality of the Parish by conserving and enhancing the following key views:

- (i) The panoramic views from Green Bank in the South West of the parish towards the church of St Mary and beyond over the marshes and the seascape
- (ii) The views from the Coastal Path across the marshes towards the Church of St Mary and towards the south west corner of the parish towards the rising escarpment.
- (iii) The views over the beach and seascape from the Coastal Path towards the North East of the Parish

Development, including incremental development, which is in close proximity to footpaths in the Protected Sites and in the Resilience and Adaptation Zone and which negatively impacts on these views or on the feeling of tranquillity, remoteness and isolation enjoyed from these walks will not be permitted.

## Policy ENV NE # Advertising and Signage

**Policy:** Proposals for advertisements or signage should conform to the following:

- I. The siting, size, height, proportions, colour, materials and supporting structure of adverts and signs should respect the character and appearance of the setting and, where appropriate the building.
- II. They should normally be provided only at points of access to sites, and located so as to minimise their visual effect on the environment
- III. The number of signs or advertisements should be kept to a minimum in order reduce visual intrusion and to avoid any negative, cumulative impact
- IV. Illuminated signs should be avoided.

## Policy SOC # New Homes

**Policy:** Proposals for new dwellings within the development envelope will be permitted provided they are consistent with other policies in the NDP with particular reference to policies ENV DC # Overall form and pattern of settlement and ENV DC # Street scene and character AND:

(A) Constitute sensitive infilling of small gaps within an otherwise continuously built up frontage and where:

- I. There is sufficient scope within the curtilage to provide satisfactory private amenity space, landscaping, boundary treatments, external storage and car parking and they
- II. respect the established character of neighbouring properties and the local area
- III. will not fill a gap which provides a positive contribution to the street scene and
- IV. are not overbearing or of a form which would be detrimental to the amenity of neighbours by virtue of loss of light and / or privacy

In order to maintain the character of the village and the street scene and to protect neighbouring amenity, it is not anticipated that permission will be given for proposals that result in more than 30% of the curtilage of the property being covered by development.

**OR** *(to be included according to support and preferences of the local community for an allocation following consultation event on January 4<sup>th</sup> 2018)*

(B) Form part of a site-specific allocation aimed at creating the additional opportunities for first-time buyers, young families and downsizers as set out above and specified in Policy ?? *(to be defined specifically for identified allocation site(s)).*

## Policy SOC # Replacement Dwellings

**Policy:** Development proposals will be permitted provided they are consistent with other policies in the NDP with particular reference to policies ENV DC # Overall form and pattern of settlement and ENV DC # Street scene and character AND they meet the following conditions:

- (i) The structure(s) constituting all new and existing development do(es) not result in a net increase of more than 40% compared with the Gross Internal Floor Area of the existing dwelling excluding any outbuildings and
- (ii) The replacement dwelling(s) is (are) not overbearing or of a form that would be detrimental to the amenity of nearby residents by virtue of loss of light and / or privacy

Proposals to replace one dwelling by two or more will be supported where (i) and (ii) above are satisfied and the replacement dwellings are small (Gross Internal Floor Area<sup>1</sup> of less than 120sq m) with well-designed, fully functional internal accommodation.

In all cases there must be sufficient scope within the existing dwelling and its curtilage to provide satisfactory private amenity space, landscaping, boundary treatments, external storage and car parking for both the existing and replacement dwelling(s). Where the existing dwelling occupies a large proportion of the curtilage particular care must be taken to avoid any harmful impacts on the street scene or neighbouring amenity.

Where permission is granted consideration will be given to the control of future extensions by

## Policy SOC # Extensions to existing dwellings, annexes and outbuildings

**Policy:** Development proposals for extensions to existing dwellings, and the provision of annexes and outbuildings will be supported where:

- (i) The proposal does not increase the Gross Internal Floor Area of the existing dwelling by more than 40% unless there are exceptional circumstances
- (ii) The proposed development respects the established character of neighbouring properties and the local area
- (iii) The proposal is not overbearing or of a form which would be detrimental to the amenity of neighbours by virtue of loss of light and / or privacy

Proposals for annexes should demonstrate both functional and physical dependency on the host dwelling. Proposals for outbuildings should demonstrate that they are required for purposes that are incidental to the use of the host dwelling.

In all cases there must be sufficient scope within the existing dwelling and its curtilage to maintain satisfactory private amenity space, landscaping, boundary treatments, external storage and car parking. Where the existing dwelling occupies a large proportion of the curtilage particular care should be taken to avoid any harmful impacts on the street scene or neighbouring amenity.

Where permission is granted consideration will be given to the control of future extensions by removal of permitted development rights.

## Policy SOC # Principal Residences

**Policy:** Proposals for new and replacement market dwellings will only be supported when it can be demonstrated that a planning condition and supporting Section 106 legal agreement will be imposed to guarantee that they will be occupied full-time as the primary (principal) residence of those persons entitled to occupy them. This Section 106 Agreement will appear on the Register of Local Land Charges.

Occupiers of homes with a Principal Residence condition will be required to maintain proof that they are meeting the condition, and will be obliged to provide this proof as and when required by the Borough Council of Kings Lynn and West Norfolk. Registration on the local Register of Electors will not alone be sufficient for this purpose and the Parish Council will cooperate with the Borough Council to monitor compliance with the restriction and in gathering and assessing evidence of any breach that may lead to enforcement action.

## Policy Soc # Local Green Spaces

**Policy:** The Neighbourhood Plan designates the following locations as Local Green Spaces, as shown on the Proposals Map:

- I. The strip of land situated to the north of the pond on Beach Road, referred to as The Green.
- II. The area known as The Triangle, located at the end of Broadwater Road, adjoining The River Hun.
- III. The Orchard Land at the northern end of Beach Road, adjacent to the car park
- IV. Part of Park Piece between Westgate and Peddars Way dedicated as a Field in Trust.

Proposals for any development on these Local Green Spaces will be resisted other than in very special circumstances, for example, where it is essential to meet the needs of utility services infrastructure and no feasible alternative site is available.

## 16 APPENDIX 9: BCKL&WN PLANNING POLICY TEAM COMMENTS ON INITIAL DRAFT POLICIES

### Individual Comments

Note those relating to the Borough Council's officers greatest concerns are highlighted.

Title / Policy	Comments	Suggested Change	Action Taken
General	<p>FB: Numbering of the Policies</p> <p>I would also reword "development boundary" to "developed land" or something like that because of two reasons.</p> <p>1) Development boundary, development envelope and settlement boundary can be seen as synonyms. Therefore, both things in one plan with a different meaning might lead to problems</p> <p>2) A boundary (or border, borderline as synonyms) is a line. E.g. the definition of boundary is a line which marks the limits of an area; a dividing line. You are using the name for an area, particularly for the area within the boundary. Therefore, I would recommend to consider rewording it.</p>		<p>Consistent naming scheme adopted to be defined and used throughout plan.</p> <ol style="list-style-type: none"> <li>1) Settlement Zone is the settled area of Holme – i.e the village</li> <li>2) Development Envelope is the area where infill can take place</li> <li>3) Garden Land is where development is restricted to protect form. Amenity and for consistency with NPPF/Local Plan</li> </ol> <p>Boundaries of the NDP Area and the Settlement Zone are shown on the map keys for clarity – but reference to boundaries will now only be made where necessary.</p>
	<p>AG: very comprehensive plan, some repetition, wording 'must', 'will be'.. maybe change to 'seek to', certain non-land use policies in the plan</p> <p>NP does not permit, consider rewording to "support"</p> <p>Header "Land Use Policies" suggests that rest of plan are not land use policies? NP policies have to deal with land use, therefore suggest a less ambiguous header/name</p>		<p>Currently hearing conflicting views and advice. Will need to revisit vocabulary following January consultation.</p> <p>Drop term 'Land Use' from header. All policies are intended to be land use policies.</p>
Gen #			

Title / Policy	Comments	Suggested Change	Action Taken
Principle of sustainable development			
ZON # Settlement Zone	AG: Should the overall purpose be explained for NPPF 53?		Remove NPPF 53 ref – and explain overall purpose in policy intro in draft plan
Zon # Managed Coastal Change	FB: Maye rename the zone “managed coastal change zone”	e.g. a name which makes it clear that it is built up area/part of the settlement affected by flood risk/coastal change	Made clear on mapping that this is part of Settlement zone. Currently includes ‘coastal change’ but may eventually find better name
	AG: is the position that this zone = existing housing and no potential for additional infill due to flood constraint?		Yes – unless situation changes. Will clarify in policy intro in draft plan
ZON # Protected Sites	FB: Personally I would reword this policy and relate to existing legislation, etc. rather than phrase it in your own words Explain that Protected Zones are designated Special Protection Areas and Special Areas of Conservation		This will be done in the intro/policy context with cross ref to existing NDP Designations Report which explains legislation etc.
	AG: HRA compliant		Noted
ZON ? Countryside policy	FB: you could just refer to Local Plan policies for the countryside		Yes - subject to consultation feedback
Zon # Drove Orchards	FB: second par. Restricts retail use (only agricultural related retail) what about “tourism related” retail? Current retail already includes other retail uses (vintage furniture, clothes?) Could be difficult to differentiate in planning use class terms.		This policy is problematic. Points all taken – and Richard’s comments re limits to growth need full consideration. Community feedback may help steer this so leave as is for now prior to restating. Need DM input.

Title / Policy	Comments	Suggested Change	Action Taken
ECON # Natural Capital & Ecosystem Services	FB: somehow it does not match the focus “economy”, I know you mean to achieve an overall positive impact, however I personally would not see a problem if a certain development’s overall impact is just neutral		Policy changed to allow for neutral impacts. Reason for economy focus will be explained in Policy intro as will method of use for DC
	AG: Presumably all proposals, not “just” development proposals Relating to Policies ENV NE		That’s correct; So need to emphasise this in Policy intro.
ECON # Sustainable Tourism			
ECON # Equestrian Land Use			
ENV DC # Overall Form and Pattern of Development			
		Suggested at meeting substitute settlement for development in policy title	Implemented as suggested
ENV DC # Street Scene and Character	FB: III: similar to nearby properties? Unsure if that’s a good idea, risk of obligation for “uniformity” -> creation of “fake” historic buildings, etc.		Corrected as suggested at meeting using Richard High proposed wording.
	AG: Does this policy also apply for the “new homes policy”?		New homes and Replacement dwellings policies updated to address comment – ‘similar to nearby properties’ removed.
	III: similar to nearby properties? Is this always appropriate?		



Title / Policy	Comments	Suggested Change	Action Taken
ENV HE # Conservation Area Policy	<p>FB: Feedback of DC needed, is a policy like that necessary? Aren't restrictions regarding conservation areas and how to deal with them in a planning application in place? I personally cannot believe it is necessary to add a policy like that in a neighbourhood plan since conservation areas are designated at many other places too? Isn't general policy like the NPPF and Local Plan (CS12, DM15) enough?</p> <p>List of listed buildings should not be part of the policy in my opinion, more suitable in a general part of the plan about historic buildings etc. in the NP area.</p>	<p>I personally would not add additional unnecessary pages to a neighbourhood plan if the topic is already covered sufficiently in the NPPF, Local Plan, etc. But is there a particular local angle that needs to be stressed?</p>	<p>Comment refers to conservation area policy and Heritage Assets Policy.</p> <p>This policy has been included because of local concerns that the Conservation Area statement is unadopted (noted in a recent developer appeal) and to afford more protection to undesignated assets which are highly valued by parishioners. Opportunities for enhancements are being missed. A Conservation area map has now been added to the plan showing these features.</p> <p>Policy wording changed from 'due regard' to 'particular regard' to emphasise importance of Conservation Area.</p> <p>NB additional clause added – 'Outline planning applications will not be acceptable in the Conservation Area'.</p>
ENV HE # Heritage Assets	<p>AG: Does the part about the conservation area statement need to be part of the policy? But is there a particular local angle that needs to be stressed?</p>		<p>Reference to conservation area statement moved to supporting text. Local dimension introduced to policy wording and reinforced by addition of Heritage map to plan. Further strengthening/explanation to be included in supporting statement.</p>
ENV NE # Biodiversity	<p>AG: See Policy ECON # -&gt; avoid duplication</p>		<p>Supporting text will be added to draft plan to make distinction and to emphasise the economic aspects of the Natural Capital Policy.</p>

Title / Policy	Comments	Suggested Change	Action Taken
ENV NE # Pollution	FB: One thing the NP group should not forget is that every new dwelling in Holme will result in additional car use due to the rural location. However, strategies to promote buildings with more efficient heating systems etc. are welcome.		AGREED. Plan is weak on this and maybe we can get advice/ideas next time we meet. In meantime we'll think about sustainable mitigation ideas and also Car Parking which is a major headache we haven't really addressed. Any ideas really welcome.
ENV NE # Water Quality and Quantity			
ENV NE # Tranquillity	FB: I think this could be joined up with the pollution policy, e.g. you already refer to noise pollution at that policy		Will consider doing this following outcome of current consultation round.
ENV NE # Dark Skies	FB: currently light pollution is one aspect of many which is taken into account within planning applications. Implementation in the NP since Holme is within the AONB seems to be a more suitable approach compared to a policy in the NP; "switched on only when needed" -> enforcement? (besides notifications by neighbours or PC complaints)		Wording changed to 'no dusk to dawn' lamps.
	AG: changes in land use -> some do not require planning permission. Could be over onerous for the BC to monitor and enforce.		Would only expect enforcement in extreme cases. This policy responds to parishioner views and it sets a tone and approach which we can hope people will respect. Many second home owners do not appreciate the impact of unnecessary external lighting on dark rural skies which are a feature of the AONB.

Title / Policy	Comments	Suggested Change	Action Taken
ENV NE # Protection of Views	FB: I think a map showing the visual axis/corridors of these views useful.		AGREED: Maps and photos will be produced
ENV NE # Advertising and Signage	FB: unsure if that's possible in a NP, since I would not see it as a traditional "land use policy"		None at present – note recent planning application for more signs at Drove Orchards – which was refused. Maybe leave for Examiner to decide?
SOC # New Homes	AG: NCP guidance -> advise for additional guidance – not part of the policy		Taken out of policy
SOC # Replacement Dwellings	FB: I would not word it as "infill or allocation" since as far as I am aware it should be infill and allocation if you decide to allocate land? Since I personally would not remove options for infill, replacement just because land is allocated somewhere		No circumstance will lead to removal or restriction of infill policy.  If Parishioners vote for an allocation will restructure this policy.
SOC # Extensions to existing dwellings, annexes and outbuildings	AG: partially repetition (I – IV)		Agree: Will review when situation re Allocations is resolved early Jan.
SOC # Principal Residences			
SOC # Principal Residences	FB: Council Tax Data (10/2017): 227 properties, 103 second homes (45.4%), as pointed out in the policy it just applies to replacement and new dwellings, therefore it does not reduce the current number of second homes.		Noted. Figures differ from those provided by Housing Strategy Team which are consistent with our own analysis of Census data. Currently doing survey based on local knowledge to find final, defensible figure. Second home owners no longer have CT incentive to register as such. Council Tax data is not reliable for this purpose.

Title / Policy	Comments	Suggested Change	Action Taken
SOC # Local Green Spaces			

**HOLME-NEXT-THE-SEA NEIGHBOURHOOD PLAN**

**FEEDBACK ON POSSIBLE DRAFT POLICIES**

*All your comments are welcome and will be taken into account in the final preparation of the Draft Neighbourhood Plan. There will be another Public Consultation when it is complete.*

<b>Are you on the Electoral Roll for Holme-next-the-Sea?</b>	<i>Please answer Yes or No</i>
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<b>Would you support a Neighbourhood Development Plan with the Draft Policies that have been suggested?</b>	<i>Please answer Yes or No</i>
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SUBJECT	COMMENTS
<b>VISION and OBJECTIVES</b>	
SUGGESTED POLICIES	COMMENTS
<b>GENERAL</b> Sustainable Development	
<b>PROPOSED ZONING SYSTEM:</b> Settlement Zone Development Envelope Garden Land Managed Coastal Change Zone Protected Sites Drove Orchards SMP Adaptation & Resilience Zone	
<b>ECONOMY</b> Natural Capital & Ecosystem Services Sustainable Tourism Equestrian Land Uses	

<p><b>BUILT ENVIRONMENT</b></p> <p><b>Design &amp; Character</b>  Pattern of Development  Street Scene and Character</p> <p><b>Heritage</b>  Conservation Area  Heritage Assets</p>	
<p><b>NATURAL ENVIRONMENT</b></p> <p>Protection of Views  Advertising and Signage  Tranquillity  Dark Skies  Pollution  Water Quality  Biodiversity</p>	
<p><b>SOCIETY</b></p> <p>New Homes  Principle Residences  Replacement Dwellings  Extensions  Local Green Spaces</p>	
<p><b>ANY OTHER COMMENTS</b></p>	

***PLEASE PUT YOUR COMPLETED FORM IN THE  
BOX BY THE DOOR BEFORE YOU LEAVE***

## HOLME-NEXT-THE-SEA NEIGHBOURHOOD PLAN

### FEEDBACK ON POSSIBLE FUTURE DEVELOPMENT

*All your comments are welcome and will be taken into account in the final preparation of the Draft Neighbourhood Plan. There will be another Public Consultation when it is complete.*

<b>Are you on the Electoral Roll for Holme-next-the-Sea?</b>	<i>Please answer Yes or No</i>
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**PLEASE INDICATE SUPPORT FOR A MAXIMUM OF TWO SITES.  
YOU DO NOT HAVE TO SUPPORT ANY.**

SUGGESTED SITE	WOULD SUPPORT	WOULD <u>NOT</u> SUPPORT	COMMENTS
<b>A</b> - Land on Peddars Way at the edge of Park Piece.			
<b>B</b> - Land at the end of Eastgate behind The Old Smithy.			
<b>C</b> - Land to the West of Eastgate and north of Main Road.			
<b>D</b> - Land to the East of Eastgate near Main Road (currently the site of agricultural barns).			
<b>E</b> - Land to the East of Chalkpit Lane (the site of the old cricket pitch).			

**PLEASE PUT YOUR COMPLETED FORM IN THE  
BOX BY THE DOOR BEFORE YOU LEAVE**

## 18 APPENDIX 11: JANUARY 2018 CONSULTATION: FEEDBACK & RESPONSES TABLE

Form	Title / Policy	Comments	Action Taken
1	Development Envelope	Development Envelope/Garden Land Boundaries need straightening/evening up (especially S of A149)	Adjusted based on BC recommendations. Extent of rear gardens reduced as per SADMP (C2.5)
1	Economy	Village shop won't be viable	Acknowledged – no action
1	Conservation Area	Extend to include whole village	NDP doesn't determine Conservation Area
1	Protection of Views	Include view from Peddars Way/National Trail across Wash	Included in revised approach to views
1	New Homes & Replacement Dwellings	Should be based on traditional style/character/materials	Included in streetscene/character/new dwellings policies
1	Local Green Spaces	No more required	Policy aims to protect existing spaces of community value without defining more
1	Other	Need more pavements & permissive paths to Thornham, Drove & Ringstead	Sustainable Travel & Tourism Policy introduced to include footpaths.
1	Biodiversity	Already adequate provision/protection for wildlife from existing conservation organisations	Evidence reports show worrying decline in biodiversity
2	Vision & Objectives	Emphasise organic growth and Sustainable Infill	Included in Holme Village Zone Policy
2	Sustainable development	Agree	Acknowledged
2	Development Envelope	Agree – but small site S of Broadwater Rd not permanent dwelling so should be removed	Site Removed
2	General	Supports all policies in NDP	Acknowledged
3	Vision & Objectives	Vision fine. Objectives need to be demonstrably achievable.	Noted
3	Built environment	Footpaths needed alongside A149	Included in new policy
3	General	Need to allow for home working	Annexes Policy wording strengthened
3	Development Envelope	Need flexible boundary for infill and extension of garden land behind or alongside properties	Infill included in existing policy Backland development discourage by SADMP policy and substantially disliked by community
3	Built environment	More footpaths needed	Included in new policy
3	Street Scene and character	New Homes/Replacement dwelling should not fill sites	Limits included in policies
3	Views	High Fences obscuring views of countryside should be subject to	New AONB landscape policy introduced.



Form	Title / Policy	Comments	Action Taken
		planning controls	
3	Dark skies	External Lighting should be subject to planning consent	New AONB landscape policy introduced.
3	Replacement Dwellings	Must be like for like – especially relevant to demolition of small dwellings. Need to retain affordable housing mix	Policies to control size of new and replacement dwellings reviewed – following BC advice changed to 40%
6	Vision & Objectives	Approve comprehensive approach	Acknowledged
6	Sustainable Development	Agree	Noted
6	Zoning system	Sensible given nature of village	Noted
6	Drove Orchards	Development rather piecemeal	Policy modified in close consultation with BC
6	Economy	Agreed	Noted
6	Built Environment	Agreed	Noted
6	Natural Environment	Agreed	Noted
6	Society	Agreed	Noted
7	Vision & Objectives	Approve	Noted
7	Sustainable Development	Approve	Noted
7	Drove	Should become visitor/shopping attraction for food/plants	Policy re-focused on farm related produce and tourist related development
7	Economy	Approve	
7	Built Environment	Agreed	Noted
7	Natural Environment	Agreed	Noted
7	New Homes	Would prefer more small houses for young and downsizers	Size limits included in policy
8	Vision & Objectives	Must control huge houses out of reach of 90% population	Size limits included in policies
8	Zoning system	Employment opportunities should be supported	Drove policy revised. Need for Home working now acknowledged in extensions policy
8	New Homes	Full occupancy to be a condition of planning consent	Principal Homes Policy in package
8	Principal Homes Policy	Agree with Policy	Noted
9	Housing/New Homes	No more development of housing except for permanent occupation.	Principal Homes policy included
9	General Comment	Holme is becoming a theme park for the Middle Classes	Noted

Form	Title / Policy	Comments	Action Taken
10	Vision & Objectives	Agreed. Out of character development undesirable. Encourage organic growth.	Noted – Street scene policy to be enhanced
10	Sustainable Development	Agreed	Noted
10	Zoning system	Agreed	Noted
10	Economy	Home business should be supported	Noted – Annexes and Outbuildings policy supporting text modified
10	Built Environment	Agreed	Noted
10	Natural Environment	Fed up with inconsiderate developers; too much noise; pollution & loss of tranquillity.	Pollution policy New comprehensive AONB policy introduced
10	New Homes	Agreed – but should allow single storey homes to be converted to 2/3 storey	Noted – but comment expresses minority view
10	Principal Residences	Agreed – must allow for people who want to build and extend in village and maintain organic development	New Homes/replacement dwellings/infill/allocation/Extensions allows this
11	Built Environment	Half Marathon run at Village Hall was inappropriate	Noted – beyond scope of Plan
11	Natural Environment	Increasing dogs and walkers will impact on bird life and wader roosts. Staffing at reserves inadequate to protect.	Biodiversity and Natural Capital policies included in Plan
11	Society	Footpath maintenance will become an issue in time	Agreed – Parish Council, not a Plan issue
12	Vision and Objectives	Keep footprints of original house when replacing dwellings	Replacements Dwellings policy restricts increase in size
13	Vision and Objectives	Agree with Plan	Acknowledged
13	Built Environment	Need to maintain street scene and character of the village Conservation Area	Noted - Street Scene and Conservation Area policies support this
13	Natural Environment	Strong agreement with all policies	Acknowledged
13	Society	Agree with Principal Homes, Replacement Dwellings at 40%. Local Green Spaces must be preserved	Acknowledged
14	Proposed Zoning System	No backland development	Noted – Form and Pattern of Settlement policy supports this
14	Economy	Supports employment creation, especially self employment	Noted – Drove, Natural Capital and Extensions policies support this
14	Built Environment	Prefer traditional materials and styles	Noted – Street Scene and New Homes support this
14	Natural Environment	Preserve as much as possible, views, tranquillity and dark skies	Noted – AONB Landscape policy introduced

Form	Title / Policy	Comments	Action Taken
		highlighted	
14	Society	100% support Principal Residence policy with S 106	Noted – Principal Residence Policy with Section 106 added to the policy
14	Other	Too many cars using Broadwater for beach and café, not bird watching	Noted – difficult but Traffic and Car Parking policy introduced, Visitor Management Plan to be investigated
15	Vision and Objectives	Agree	Acknowledged
15	Built Environment	Keep to local design and culture	Noted – Street Scene and Character policy extended
15	Natural Environment	Strong support, especially advertising and signage	Noted – strong policy package including Advertising Policy
15	Society	No new homes. Yes to Principal Residences, replacement dwellings and extensions within reason, support Local Green Spaces	Some agreement – Principal Homes, Local Green Spaces and upper limit included in Extensions policy
15	Other	The delight of Holme is that it is a typical Norfolk village and must be maintained. Large builds on small plots look out of kilter	Noted – combination of policies aimed at this outcome with limits on plot ratios
16	Natural Environment	Protect views. All new houses are lit up at night	Noted – Views policy revised and included along with Dark Skies considerations in new AONB Landscape policy
16	Society	Principal Residences a good idea	Noted – Principal Homes policy included
17	Vision and Objectives	Agree	Acknowledged
17	Economy	Agree	Acknowledged
17	Built Environment	Traditional design	Noted – reflected in Street Scene and Character policy
17	Natural Environment	Protect	Noted – reflected in strong policy package
17	Society	Support for Principal Homes, related policies and Local Green Spaces	Acknowledged
18	Vision and Objectives	Agree	Acknowledged
18	Proposed Zoning System	Good idea	Acknowledged
18	Economy	Might this include toilets	Public toilets are an issue – Pollution and Water policies recognise this, possibly investigate in Visitor Management Plan.
18	Built Environment	Support	Acknowledged
18	Society	Strong support Principal Residences, Extensions and Replacement Dwellings.	Noted – covered by strong policy package

Form	Title / Policy	Comments	Action Taken
19	Other	Support Plan	Acknowledged
20	Vision and Objectives	Support	Acknowledged
20	Proposed Zoning System	All areas need protected status	Protected status acknowledged through policy where appropriate
20	Built Environment	Need to clean up after builders' vehicles	Noted – now reflected through Pollution policy
20	Natural Environment	Must protect what is there	Noted – reflected through strong policy package
20	Society	Limit number of large dwellings to encourage local families to afford property	Noted – reflected in Dwellings policies and Principal Homes policy
21	Proposed Zoning System	Absolutely no backland planning	Development Envelopment tightened to reflect this
21	Drove Orchards	Watch any proposed development very closely!	Revised policy worked out in close collaboration with BC Development Management Team
21	Street Scene and Character	Must change with fashion	All development is possible within proposed policies
21	Conservation Area	Protect at all costs	Agreed – acknowledged through specific policy which reinforces an adopted BC statement
21	Natural Environment	Signage by Drove is a worry. Light pollution is a worry – no all night exterior lights	Noted – supported through Advertising and Dark Skies component of AONB Landscaping policy
21	Society	Fully support. Worried that existing planning policies ignored by developers. Can NDP be enforced?	Enforcement considered in conjunction with BC policy and DM teams
21	Other	Strong support	Acknowledged
22	Built Environment	New homes needed for young and old including retirees from the village. Modern features needed, not always the same look	Noted – reflected through New Homes, Principal Residences and Street Scene policies
23	Other	Support Plan	Acknowledged
24	Other	Support Plan	Acknowledged
25	Sustainable Development	Agree. Difficulties with pavement acknowledged.	Encouragement to new footpaths given through Sustainable Travel policy
25	Economy	Support cottage industry and better broadband	Noted – aim to reflect through Extensions, Annexes and New Homes policies
25	Built Environment	Generally supports	Acknowledged
25	Natural Environment	Generally support	Acknowledged
25	Society	Strongly support but would like to see consistent approach	Noted – Principal Homes condition proposed for both new and replacement dwellings

Form	Title / Policy	Comments	Action Taken
25	Local Green Spaces	Why not include field in the middle of village?	Field is in private ownership. Protection strengthened through Holme Village Zone policy
25	Other	Speculative land purchases should not lead to development	Noted – NDP aims to lead development according to local preferences
26	Vision and Objectives	Supports	Acknowledged
26	Sustainable Development	Supports	Acknowledged
26	Proposed Zoning System	Supports	Acknowledged
26	Economy	Supports	Acknowledged
26	Built Environment	Supports	Acknowledged
26	Natural Environment	Supports	Acknowledged
26	Society	Support size limitations on dwellings. Why is New Homes policy split into two?	Consider having two separate policies
26	Other	Concern that two sites assessed are led by developers who do not care for environment or village	All five sites would be subjected to the same standard form of assessment which would take account of the environment and character of the village and community
27	Vision and Objectives	Supports	Acknowledged
27	Sustainable Development	Is there such a thing?	Hopefully but we must try!
27	Proposed Zoning System	Supports	Acknowledged
27	Economy	Supports but questions Sustainable Tourism	Noted – new Sustainable Travel and Tourism policy introduced to support lower impact activities and management of visitor pressure
27	Built Environment	Supports	Acknowledged
27	Natural Environment	Supports but concerns about intrusive advertising and day and night lighting	Noted – concerns addressed through Advertising and Dark Skies in AONB Landscape policy
27	Society	Any new homes should be for locals and their children	Noted – Principal Homes policy aims to support families living and working in the area but the vibrancy of the community depends on incomers
27	Other	Supports Plan but considers much development to be unjustified by local needs	Noted – strong policy package aims to address these issues
28	Vision and Objectives	Supports	Acknowledged
28	Sustainable	What is that?	Noted

Form	Title / Policy	Comments	Action Taken
	Development		
28	Proposed Zoning System	Objects to backland development and oppressive development	Noted – residential amenity considerations added to Street Scene and Character policy to reflect comments such as this
28	Economy	Enough tourism here without more	Noted – policies try to diffuse impacts of tourism whilst striking a balance
28	Built Environment	Increase Conservation Area to include more of village	Revisions to the Conservation Area fall outside the remit of the Plan
28	Natural Environment	Supports but wants to limit adverts and exterior lighting	Noted – concerns expressed through Advertising and Dark Skies in AONB Landscape policy
28	Society	Supports size limit on replacement dwellings. No real need for new homes, but if essential green spaces need to be protected in the residential environment	Acknowledged through Street Scene and Character policy
28	Other	No restrictions on dog walking as people damage wildlife more	Noted – no restrictions imposed on dog walking in Plan
28	Other	Chose to live in a beautiful small village but the environment is being ruined by developer activity	Noted – the Plan aims to create more sympathetic approach to development
29	General	Strong support for all policies in Plan	Acknowledged
30	Proposed Zoning System	Should include allocation for tourism	Noted – specific zone designated at Drove Orchards and elsewhere low impact tourism promoted in keeping with environmental constraints
30	Principal Residences	Cannot be applied, is unnecessary and cannot be monitored	Comment based on opinion, evidence suggests otherwise
31	Vision and Objectives	Supports	Acknowledged
31	Sustainable Development	Supports	Acknowledged
31	Proposed Zoning System	Strong support for zoning system	Acknowledged
31	Built Environment	Strong support	Acknowledged
31	Society	40% a little high for replacement dwellings and extensions	It is understood that 40% is deemed to be the optimum value in relation to current permitted development rights
31	Other	Strong support	Acknowledged
32	General	Strong support for the Plan with particular support for Principal Residences policy	Acknowledged
33	Society	Supports Principal Residences policy	Acknowledged
34	Built Environment	Supports	Acknowledged

Form	Title / Policy	Comments	Action Taken
34	Natural Environment	Supports	Acknowledged
34	Society	Supports – too many small properties knocked down for enormous houses	Noted – size of replacement dwellings controlled through proposed Replacement Dwellings policy
34	Other	Need restrictions on second homes	Noted – addressed through Principal Homes policy
35	General	Supports Plan	Acknowledged
36	General	Supports Plan and wants to keep village as it is with little new development	Acknowledged
37	General	Not a resident but considers Plan excellent and more Parishes should do the same	Acknowledged
38	General	Supports Plan	Acknowledged
39	Proposed Zoning System	Considers Drove Orchards a problem	Noted – specific policy for Drove included in the Plan
39	Built Environment	Urgent need for policy	Immediate need for policy recognised
39	Natural Environment	Of great importance to maintain our village	Noted – strong policy package to support environment
39	Society	Agree with size limits on buildings – how is it to be policed?	Policing via Planning Applications and enforcement
39	Other	Strong support	Acknowledged
40	Proposed Zoning System	Strong support	Acknowledged
40	Natural Environment	Hun water quality should be improved	Noted – supported by Pollution and Water Resource Management policies
40	Society	Number of permanently homes means there is no need for new ones	Noted – supported by Principal Homes policy
40	Built Environment	New houses and extensions need to be built with greater sensitivity	Noted – addressed through Street Scene, New Homes and Replacement Dwellings policies
40	Other	Holme is a very pleasant small village and needs to be maintained where possible	Noted – supported by Plan Objectives
41	General	Strong support for Plan and proposed Zoning System	Acknowledged
41	Society	Support for Principal Homes policy but sceptical about satisfying plot coverage requirement with the potential for friction	Noted – plot coverage issues addressed through Street Scene and New Homes policies and will be enforced through the BC Planning enforcement system in the usual way, with proposed policy satisfying a strong majority view
42	General	Strong support	Acknowledged
42	Principal Residency	Very important to follow St. Ives	Noted – supported through Principal Residency policy
43	Built	Hope the NDP re-enforces the	Noted – once made, the NDP will

Form	Title / Policy	Comments	Action Taken
	Environment	Local Development Framework and suggests there has been inadequate control in the Conservation Area in the past	become part of the LDF framework and its policies will be material considerations in the determination of Planning Applications
43	Society	All new builds should have off street parking to address village's parking problems and Principal Residences an excellent idea	Noted – car issues addressed through Traffic and Car Parking policies
43	Other	Can see no way to get young people into the village because of lack of employment	Noted – aimed to address through Extensions Annexes and Outbuildings policy as well as the Drove policy
44	Vision and Objectives	No need to build houses for second homes	Noted – addressed through Principal Homes policy
44	Sustainable Development	Conservation of landscape and wildlife outweighs need for future development	Noted – addressed through Ecosystems Services policy
44	Natural Environment	Advertising and signage should be limited	Noted – addressed through Advertising and Signage policy
44	Society	Better controls on building size and use of gardens for development	Noted – addressed through strong policy package dealing with housing development
45	General	No comments apart from no support for housing allocation	Noted
46	General	Supports Plan and no other comments	Acknowledged
47	Vision and Objectives	Not positively prepared and environment policies negatively worded	Noted
47	Sustainable Development	Supports	Acknowledged
47	Proposed Zoning System and Economy	Should be allocations for housing and small scale tourism – too restrictive	Noted – there is an allocation for housing and small scale , low impact tourism is supported through the Sustainable Travel and Tourism as well as Natural Capital and Ecosystems Services policies
47	Built Environment	OK but needs an exception site for more social housing	Noted – no need demonstrated. A site is allocated for lower cost principal homes and discussions with BC Housing Strategy Team indicated that Holme's lack of facilities make it unsuitable for social housing
47	Society	Principal residency not enforceable/necessary	Noted – inconsistent with evidence and majority view.
47	Other	Disappointed not to see affordable housing for local young people	See above
48	Vision and Objectives	Like the idea of second home owners being involved but what about Letting Agents who work	Views have by necessity been sought from property owners but anyone involved in the community is entitled



Form	Title / Policy	Comments	Action Taken
		commercially	to submit their views
48	Sustainable Development	Should be at the forefront	Acknowledged
48	Proposed Zoning System	Excellent in theory but difficult to enforce. Protected sites should be sacrosanct. Drove provides a popular facility. Resilience Zone is a good idea.	Acknowledged
48	Economy	All supported and equestrian land uses should be encouraged	Noted – development consistent with Natural Capital is possible but equestrian uses are already well established in the Parish and further uses are not being encouraged based on concerns relating to damage of the dunes and protected sites expressed by the wildlife associations and Natural England
48	Natural Environment	Strongly supported but signage is getting out of hand	Acknowledged – Advertising and Signage policy introduced to control use
48	Society	Replacement dwellings and extensions should be restricted to enhance village character, should reflect street scene and not be over dominant. Local green spaces should be retained	Addressed through the Extended Street Scene and Local Green Spaces policies
49	General	Supports Plan and very impressed by the policies, especially natural environment	Acknowledged
50	Proposed Zoning System	Zones and map are very helpful for providing an overview of land use types	Acknowledged
50	Society	Supports measures to limit the numbers of second homes, the size of replacement dwellings and on-going increased build size of property. The 30% and 40% limits are excellent for controlling property sizes and values	Acknowledged and dealt with through carefully balanced package of housing policies – some limits slightly relaxed in consultation with the BC
51	General	Supports Plan with only comment being the impressive presentation	Acknowledged
52	General	Supports Plan and supports new homes only for principal residences	Noted
53	General	Supports Plan and supports new homes only for principal residences	Noted
54	General	Would not support Plan with no reasons given but would support	Noted

Form	Title / Policy	Comments	Action Taken
		three of the possible housing allocations	
55	General	Would not support Plan with no reasons given but would support three of the possible housing allocations	Noted
56	General	Would not support Plan with no reasons given but would support one of the possible housing allocations	Noted
57	General	Supports Plan and fully supports Drove Orchards proposed policy	Acknowledged
58	General	Supports Plan with no other comments	Acknowledged
59	Vision and Objectives	Agree	Acknowledged
59	Sustainable Development	Agree	Acknowledged
59	Proposed Zoning System	Agree with the need to protect the integrity of the village paramount	Acknowledged
59	Economy	Agree. Plan meets need to balance economy and natural environment	Acknowledged
59	Built Environment	Agree. Material and style of new developments should reflect local materials and traditional character	Noted – addressed through Street Scene policy
59	Natural Environment	Agree. These are important priorities and will help to preserve the village whilst allowing sympathetic development	Acknowledged
59	Society	Agree especially with size limitations and preferably replacing single dwellings with two or more smaller dwellings for local retired people	Noted – Replacement Dwellings policy amended to reflect comments
59	Other	Smaller properties for local residents needed to balance holiday and second homes. Development on land that is currently agricultural should be resisted	Noted - addressed through the package of housing policies and part of the overall Vision of the Plan. Noted – a new countryside policy has been introduced covering the need to protect agricultural land
60	General	Supports Plan	
60	Built Environment	100% of building should be local materials and reflect local character with heritage being very important	Noted - addressed through extended Street Scene, Heritage Assets and Conservation Area policies
60	Natural	Character must be preserved –	Noted – addressed by the

Form	Title / Policy	Comments	Action Taken
	Environment	once it's gone, it's gone for ever!	underpinning Objectives and approach for the Plan
60	Society	New homes are OK if not too big and do not want bungalows turned into massive houses. Green space very important	Noted – addressed through New Homes, Replacement Dwellings and Extensions/Annexes policies as well as specific policy on Local Green Spaces
61	General	Supports Plan	Acknowledged
61	Proposed Zoning System	Garden land should not be built on or developed in any way. Agrees with tight controls in these policies	Acknowledged – point about garden land addressed through changes to the Development Boundary
61	Economy	Agree. Eco system needs protecting at every stage.	Noted – addressed through Natural Capital and Ecosystems Services policy
61	Built Environment	Supports all policies having a high level design aimed at protecting the AONB. Strongly supports the proposal for greatly needed footpaths	Noted – addressed through the AONB Landscape and Countryside policies. Acknowledged – Sustainable Travel and Tourism policy introduced with focus on footpaths
61	Natural Environment	Strong support especially for View 1.	Acknowledged – Views policy amended to reflect comments
61	Water Quality	Sewage not acceptable!! Health risk	Acknowledged – issues addressed through Pollution and Water Resource Management policies
61	Society	Agrees with size limits and privacy	Acknowledged – Street Scene policy extended in response to comments about residential amenity, particularly overlooking
62	General	Supports Plan	Acknowledged
62	Proposed Zoning System	Agree with development envelope, and it is vital that development southwards into agricultural land is not allowed. Zoning language seems tight which is good	Acknowledged – the Development Boundary tightened in consultation with BC
62	Economy	Correct that local economy depends heavily on preservation of the natural environment	Noted – addressed through cross cutting provisions of Natural Capital and Eco Systems policy
62	Built Environment	Given recent ugly development supports Plan's approach to new development	Acknowledged
62	Natural Environment	Strongly supports controls on development especially supports views and tranquillity approach	Acknowledged and noted – addressed through the AONB Landscape policy
62	Society	Strongly supports 40% size limit on new homes and 30% development on curtilages	Acknowledged – 30% increased to 40% in consultation with the BC
63	General	Excellent Plan, excellent exhibition – cannot comment further as from a neighbouring Parish Council (Old Hunstanton)	Acknowledged

Form	Title / Policy	Comments	Action Taken
64	General	Overall and general agreement	Acknowledged
64	Proposed Zoning System	Support for Drove Orchards but over development should not make it a 'destination'	Noted – reflected in Drove Orchard policy
64	Built Environment	Supports infill, footpath on A149 would be very welcome	Acknowledged
64	Society	30% limit supported as a target. Terraced houses could be good. Smaller houses needed for families and downsizes. Particularly supports Principal Residence policy. Supports 40% limit for replacement dwellings. Contrasting and similar designs can be equally successful. 30% limit on extension would be adequate to ensure subsidiarity to main building	Acknowledged – addressed through the package of housing policies and the comment regarding smaller houses has been taken on board specifically in the new Housing Allocation policy  Acknowledged – see previous comments
64	General	Area of Coastal Management Change ideal for non-traditional design and material	Acknowledged – new Holme Village policy reflects constraints in flood risk area but leaves room for innovative design particularly in conjunction with Replacement Dwellings policy
65	General	Strong support with no other comments	Acknowledged
66	General	Does not support the Plan with no reasons given but supports Built and Natural Environment policies	Acknowledged
67	General	Does not support Plan but supports all policies with the exception of Principal Residence policy and considers no new homes required. Plan fails to balance the interests of residents and second home owners. The problem for potential new residents in Holme is lack of employment and career opportunities and any further development in Holme will make the problem worse as there are already a large number of new homes being built in Hunstanton.	Noted - Plan seeks to support career opportunities through home working and to improve the balance between principal and second homes (currently >55%). The Principal Residence policy does not affect existing second home owners and specifically it will not prevent them from competing for existing housing stock.

## 19 APPENDIX 12: BC DEVELOPMENT MANAGEMENT FEEDBACK

### Comments on Draft Holme Next the Sea Neighbourhood Plan by Officers of the Borough Council of King's Lynn & West Norfolk

14/12/17

**NDP Team note:** The action taken column shows the agreed approach to addressing the comment in question. If the action has been implemented but not confirmed the action is highlighted in yellow.

### Additional Comments on Draft Holme Next the Sea Neighbourhood Plan by Officers of the Borough Council of King's Lynn & West Norfolk

20/04/18

**Additional NDP Team note:** Text in grey represents comments by the BC and changes made by the NDP team immediately prior to the January 2018 Community Consultation on draft policies and possible site allocations.

Text highlighted in yellow is as noted above.

Text highlighted in red is where the NDP team would welcome further input/advice from the BC.

## 19.1 Individual Comments

Title / Policy	Comments	Suggested Change	Action Taken
General	<p>FB: Numbering of the Policies I would also reword “development boundary” to “developed land” or something like that because of two reasons.</p> <p>1) Development boundary, development envelope and settlement boundary can be seen as synonyms. Therefore, both things in one plan with a different meaning might lead to problems</p> <p>2) A boundary (or border, borderline as synonyms) is a line. E.g. the definition of boundary is a line which marks the limits of an area; a dividing line. You are using the name for an area, particularly for the area within the boundary. Therefore, I would recommend to consider rewording it.</p>	Use a straight forward Numbering of the policies	<p>Consistent naming scheme adopted to be defined and used throughout plan.</p> <p>4) Settlement Zone is the settled area of Holme – i.e the village</p> <p>5) Development Envelope is the area where infill can take place</p> <p>6) Garden Land is where development is restricted to protect form. Amenity and for consistency with NPPF/Local Plan</p> <p>Boundaries of the NDP Area and the Settlement Zone are shown on the map keys for clarity – but reference to boundaries will now only be made where necessary.</p> <ol style="list-style-type: none"> <li>1. Policies numbered 1-n as suggested with prefix</li> <li>2. Naming scheme changed consistent to distinguish between boundaries and areas.viz. <ol style="list-style-type: none"> <li>a. Reference now made to Village Boundary which is a boundary around the village area.</li> <li>b. Use of term ‘Development Envelope’</li> <li>c. Managed Coastal Change replaced with ‘Village Flood Risk Zone’</li> </ol> </li> </ol> <p>NB word boundary could be added to Neighbourhood Area on map legend?</p>

Title / Policy	Comments	Suggested Change	Action Taken
	<p>AG:very comprehensive plan, some repetition, wording 'must', 'will be'.. maybe change to 'seek to', certain non-land use policies in the plan NP does not permit, consider rewording to "support"</p> <p>Header "Land Use Policies" suggests that rest of plan are not land use policies? NP policies have to deal with land use, therefore suggest a less ambiguous header/name</p>		<p>Currently hearing conflicting views and advice. Will need to revisit vocabulary following January consultation.</p> <p>Drop term 'Land Use' from header. All policies are intended to be land use policies.</p>
<p><b>"Zoning" Map</b></p>	<p><b>Comments Suggested Change "Zoning" Map</b></p> <p>FB: Village envelope, development envelope, settlement boundary, development boundary are synonymous terms</p> <p>Development Boundary -&gt; as the term points out it is a line not an area!</p> <p>"Managed Coastal Change" suggests something very different to a built up area in an area affected by sea-level rise, etc.</p> <p>"SMP adaptation and resilience zone" unclear what it is and what's the connection to the Shoreline management plan</p>	<p>reword</p> <p>reword</p> <p>reword</p> <p>reword</p>	<p>Zones renamed</p> <p>See above</p> <p>Zone renamed as 'Village Flood Risk Zone'</p> <p>Dropped SMP from title; Explanation and justification will be given in policy supporting text (note supporting text was not provided in the draft policy document circulated)</p>

Title / Policy	Comments	Suggested Change	Action Taken
	<p>DM(HM/KL):</p> <ul style="list-style-type: none"> <li>• Plan Zones header, should be called Legend</li> <li>• Neighbourhood Area and Settlement Boundary are very similar symbols</li> <li>• Settlement Boundary -&gt; no inner boundary of Holme</li> <li>• Current “Development Boundary” shows an area and not a boundary!</li> </ul> <p>Consider a rewording to built-up area or similar</p> <ul style="list-style-type: none"> <li>• Managed Coastal Change, consider rewording - &gt; since it shows built up area of Holme affected by coastal change, sea-level rise, flood risk?</li> <li>• Garden Land -&gt; this should be removed from the plan as it draws attention to them and makes it look like they are areas suitable for development. Additionally, they should not be included unless they can demonstrate that the areas are lawfully garden land. Just because land is currently being used as garden doesn't mean that is its lawful use. unsure if all areas mapped as garden land are actually used as garden</li> <li>• No “countryside” in the legend</li> <li>• “Other Zones” -&gt; consider a rewording since it shows designations, designated areas and not really zones where you want certain things to be permitted/take place</li> <li>• Local Green Space -&gt; yellow? Wouldn't be a green be more reasonable</li> </ul>	<p>Reword</p> <p>Change Neighbourhood Area symbol Consider an inner boundary</p> <p>Reword</p> <p>Reword</p> <p>Removal of garden land recommended</p> <p>Add missing countryside legend symbol Reword</p> <p>Change symbol</p>	<p>Done</p> <p>Done</p> <p>Done</p> <p>See above</p> <p>Now called ‘Development Envelope’ throughout</p> <p>Done; Now referred to as Village Flood Risk Zone</p> <p>Done: garden Land zone removed – will rely on LDF policy to protect gardens per se. Gardens are now all part of the Village but large garden areas are outside the Development Envelope to provide similar protection. This provides stronger NDP protection for the open area in the centre of the village as per community consultation feedback.</p> <p>New ‘Countryside’ zone added. Agree with AG –HRA compliant and necessary under EU and UK legislation. Vital to development management in Holme given past experience, traffic, visitor and developer pressure and pollution.</p> <p>Done – changed to green.</p>



Title / Policy	Comments	Suggested Change	Action Taken
Policy 1:Gen # Principle of sustainable development	DM(HM/KL): Simplification recommended Definition of “development” needed: which development? Residential?...	Simplify policy Add definitions	Definition to be included in policy supporting text – ‘development’ means ‘all development’ – residential or otherwise. Glossary will be provided in Appendix to Plan.
	DM(HM/KL): Very extensive, complicated neighbourhood plan, simplification recommended General reminder to NP-Groups: Permitted Development rights exist, the neighbourhood plan can be only used if an application is submitted, if something is done as permitted development no application is submitted therefore the neighbourhood plan does not apply. Policy Numbering Currently too overcomplicated, consider a change to a simple numbering to enable a straightforward referral to policies and enable a reader to find the relevant policies. Society header does not really fit to the policies	Simplify the plan  Change to a simple numbering of the policy  Consider a rewording of the header	Agreed: - Zoning system simplified and terminology simplified. Will continue to seek simplification.  See above  Plan is structured around sustainable development principle – hence Economy, Society & Environment. Could be community? Don’t understand comment.
	AG: Should the overall purpose be explained for NPPF 53?		Remove NPPF 53 ref – and explain overall purpose in policy intro in draft plan
policy 2 Zon # Settlement Zone			

Title / Policy	Comments	Suggested Change	Action Taken
Zon # Managed Coastal Change	FB: Maybe rename the zone “managed coastal change zone”	e.g. a name which makes it clear that it is built up area/part of the settlement affected by flood risk/coastal change	Made clear on mapping that this is part of Settlement zone. Currently includes ‘coastal change’ but may eventually find better name Done: Renamed to Village Flood Risk Zone.
	AG: is the position that this zone = existing housing and no potential for additional infill due to flood constraint?		Yes – unless situation changes. Will clarify in policy intro in draft plan
			<b>Continued over</b>

Title / Policy	Comments	Suggested Change	Action Taken
	<p>DM(HM/KL): zones/zoning is an American term <b>Development boundary</b> -&gt; is a line by definition not an area Subheaders in policy text recommended <b>Garden Land area:</b> -needs to be checked if the mapped land is lawfully garden, we are not certain it all is. -What's the benefit of that "zone" compared to drawing a development boundary to prevent back garden development? It would be preferable to draw a development boundary tight around the existing built form instead whilst still allowing for infill, for example. <b>"Managed Coastal Change"</b> - -&gt; name does not really fit -Simplification needed since suddenly also referral to Conservation Sites, Protected Species, AONB is made, which does not really fit there -No information regarding extensions or replacement in that area? Or does the same apply as anywhere else? Unclear what the "orange zone" tells developers, land owners? E.g. What if you demolish a house in the orange area and replace it with 2 dwellings?</p>	<p>Consider a name change Reword</p> <p>Removal recommended</p> <p>Tight development boundary to prohibit back garden development recommended</p> <p>Reword</p> <p>Simplification needed!</p> <p>Clarification needed</p>	<p><b>Etymology</b> From Latin zōna, and Ancient Greek ζώνη (zōnē) - middle english term. Zones used internationally to regulate use of land for over 3000 years.... <b>Draft plan will be well structured with para numbers etc.</b> Done – zone removed</p> <p>Done</p> <p>Done – see above</p> <p>Done - This zone adjoins highly sensitive parts of the protected sites and is a known area of sensitivity for protected species esp Natterjack Toad, Water Vole and certain bats. Policy simplified and clarified as suggested. <b>Extensions and replacements dealt with elsewhere in plan – this will be spelled out in Policy intro.</b> <b>Orange zone is now the village flood risk zone – will have its own policy wording.</b> <b>Replacement of 1 house with 2 would almost certainly increase exposure to flood risk and therefore would not be allowed – this to depend on circumstances</b></p>

Title / Policy	Comments	Suggested Change	Action Taken
Policy 3 - ZON # Protected Sites	<p>FB: Personally I would reword this policy and relate to existing legislation, etc. rather than phrase it in your own words</p> <p>Explain that Protected Zones are designated Special Protection Areas and Special Areas of Conservation</p>		<p>This will be done in the intro/policy context with cross ref to existing NDP Designations Report which explains legislation etc.</p>
	AG: HRA compliant		<p>Noted: SEA/HRA to be progressed</p>
	<p>DM(HM/KL):</p> <p>This policy is a “challenge” and is not really needed, since there is legislation for these areas/designations in place</p> <p>Removal recommended</p>		<p>Legislation does not deal with SMP related issues which threaten the protected sites in Holme. Past experience and current state of qualifying features all indicate this policy is an absolute must. Community consultation feedback strongly supports it.</p>
			<b>Continued over</b>

Title / Policy	Comments	Suggested Change	Action Taken
<b>Policy 4 – ZON # SMP Adaptation and Resilience Zone</b>	FB: name is quite unclear Aim of the policy unclear  DM(HM/KL): Wording of the policy needs improvement, what does this policy want to achieve?? What is the background for the boundary of this area? (South of the A149) Is it in the countryside, is it different to general countryside Limitations for development in countryside are in place, furthermore also limited due to AONB designation Is this policy necessary? There is a Shoreline Management Plan in place Definitions needed to enable a use of this policy: “Small buildings”, “low intensity, sustainable agriculture”, does the “effective management of water resources” apply to built-form or landuse? What is limited car parking?	Rewording and clarification recommended   reword	Done – SMP dropped from name. Will stress in policy supporting text that policy aims to help mitigate negative impacts of SMP on economy and society by providing compensating area that will also help diffuse visitor pressure on Protected Sites.  Further explanation will be provided in Policy supporting text. Only sufficiently large, coherent area left after SMP. Area of opportunity with existing, well connected footpath network – relating to Peddars Way and National Trail. Easily accessible from village – high biodiversity potential and corridor to Courtyard Farm. Exceptional views and dark night skies.  Is necessary BECAUSE of the SMP  Further explanation to be provided in policy supporting text  This is Land Use. What does and doesn't need planning permission?
<b>Policy x ZON ? Countryside policy</b>	FB: you could just refer to Local Plan policies for the countryside  DM(HM/KL): It is necessary, specification is needed for the “countryside area” outside of the development boundary and other areas. Also not shown in the legend!	Information about countryside needed!	Yes - subject to consultation feedback Countryside is now a separate zone  Countryside is now a separate zone  Will be subject to LDF policies but will also now have its own policy and justification

Title / Policy	Comments	Suggested Change	Action Taken
Policy 5 Zon # Drove Orchards	<p>FB: second par. Restricts retail use (only agricultural related retail) what about “tourism related” retail?            Current retail already includes other retail uses (vintage furniture, clothes?) Could be difficult to differentiate in planning use class terms.</p>		<p>This policy is problematic. Points all taken – and Richard’s comments re limits to growth need full consideration. Community feedback may help steer this so leave as is for now prior to restating.</p>
	<p>DM(HM/KL):            The boundary is supported, useful to determine future applications, etc.            Permission of uses related to agricultural use and tourism related use may be preferable as ‘related to agricultural use’ is quite restrictive and would not apply to the majority of businesses that currently operate from the site.            Restaurants are no problem?            Restriction of retail uses not directly related to agricultural use -&gt; What is this seeking to achieve as it is very restrictive? For example, looking at the existing retail offer on the site the majority of current occupiers would not comply with this, other than the farm shop itself therefore such a policy would prevent any additional ‘lifestyle shops’ etc</p>		<p><b>ADVICE NEEDED HERE ESPECIALLY IN LIGHT OF RECENT APPLICATION/WITHDRAWAL FOR MAJOR INCREASE IN SCALE AND OBJECTIONS FROM COUNTY HIGHWAYS.</b></p> <p><b>Public opinion seems divided, NCP position confused, what does the BC want to see here?</b></p>
Policy 6 ECON # Natural Capital & Ecosystem Services	<p>FB: somehow it does not match the focus “economy”, I know you mean to achieve an overall positive impact, however I personally would not see a problem if a certain development’s overall impact is just neutral</p>		<p>Policy changed to allow for neutral impacts.            Reason for economy focus will be explained in Policy intro as will method of use for DC</p>

Title / Policy	Comments	Suggested Change	Action Taken
	AG: Presumably all proposals, not “just” development proposals Relating to Policies ENV NE		That’s correct; So need to emphasise this in Policy intro.
	DM(HM/KL): Development proposal must have an overall positive impact? Hard to judge and to prove by the applicant Change to “neutral impact” recommended	Consider a change to “neutral impact”	Now revisited in light of more feedback, recent Govt. 25 year plan for Environment and Economy Paper Natural Capital Assessment. Positive impacts are clearly needed to compensate for existing and potential natural capital losses.  Will suggest simple tick box approach based on headings in Policy to make judgement easy.  Views please?
Policy 7 ECON # Sustainable Tourism	DM(HM/KL): Definition useful for small-scale, low-key recreational facilities	Definitions needed	Agreed. Will provide in Policy supporting text
Policy 8 ECON # Equestrian Land Use			
Policy 9 ENV DC # Overall Form and Pattern of Development		Suggested at meeting substitute settlement for development in policy title	Done: Implemented as suggested
Policy 10 ENV DC # Street Scene and Character	FB: III: similar to nearby properties? Unsure if that’s a good idea, risk of obligation for “uniformity” -> creation of “fake” historic buildings, etc.		Corrected as suggested at meeting using Richard High proposed wording.

Title / Policy	Comments	Suggested Change	Action Taken
	<p>AG: Does this policy also apply for the “new homes policy”?</p> <p>III: similar to nearby properties? Is this (similar) always appropriate? – Would be the use of the term “relate well to” be better?</p> <p>DM(HM/KL): This is a good detailed policy - Helpful for DC to determine planning applications</p>	<p>Possibly consider to change “similar” to “relate well to”</p>	<p>New homes and Replacement dwellings policies updated to address comment – ‘similar to nearby properties’ removed.</p> <p>– Done. see above</p>
<p>Policy 11 ENV HE # Conservation Area Policy</p>	<p>FB: Feedback of DC needed, is a policy like that necessary? Aren’t restrictions regarding conservation areas and how to deal with them in a planning application in place? I personally cannot believe it is necessary to add a policy like that in a neighbourhood plan since conservation areas are designated at many other places too? Isn’t general policy like the NPPF and Local Plan (CS12, DM15) enough?</p> <p>List of listed buildings should not be part of the policy in my opinion, more suitable in a general part of the plan about historic buildings etc. in the NP area.</p>	<p>I personally would not add additional unnecessary pages to a neighbourhood plan if the topic is already covered sufficiently in the NPPF, Local Plan, etc. But is there a particular local angle that needs to be stressed?</p>	<p>Comment refers to conservation area policy and Heritage Assets Policy.</p> <p>This policy has been included because of local concerns that the Conservation Area statement is unadopted (noted in a recent developer appeal) and to afford more protection to undesignated assets which are highly valued by parishioners. Opportunities for enhancements are being missed. A Conservation area map has now been added to the plan showing these features.</p> <p>Policy wording changed from ‘due regard’ to ‘particular regard’ to emphasise importance of Conservation Area.</p> <p><b>NB additional clause added – ‘Outline planning applications will not be acceptable in the Conservation Area’</b></p>



Title / Policy	Comments	Suggested Change	Action Taken
	DM(HM/KL): Useful addition and a good reminder for developers/applicants (often forgotten that conservation areas exist and affect proposals) Could be merged with Policy 12 (Heritage Assets) though as Conservation Areas are Heritage Assets. Refer to Local Plan and NPPF	Consider to joint policy 11/12	Will make plan more complex if policies merged – especially because Holme has many Heritage Assets outside the Conservation Area.
Policy 12 ENV HE # Heritage Assets	AG: Does the part about the conservation area statement need to be part of the policy? But is there a particular local angle that needs to be stressed?		Agreed. Reference to conservation area statement moved to supporting text. Local dimension introduced to policy wording and reinforced by addition of Heritage map to plan. Further strengthening/explanation to be included in supporting statement.
	DM(HM/KL): Could be merged with Policy 11 (Heritage Assets) though as Conservation Areas are Heritage Assets.	Consider to joint policy 11/12	See above
Policy 13 ENV NE # Biodiversity	AG: See Policy ECON # -> avoid duplication		Supporting text will be added to draft plan to make distinction and to emphasise the economic aspects of the Natural Capital Policy.
	DM(HM/KL): Development proposals -> every proposal? No matter which size? or will it be just necessary if it is relevant		Yes – all proposals however small have a role to play and we believe most people have a positive view of this if they understand the position. However, need to make clear that contributions should be proportionate in the supporting text.

Title / Policy	Comments	Suggested Change	Action Taken
Policy 14 ENV NE # Pollution	FB: One thing the NP group should not forget is that every new dwelling in Holme will result in additional car use due to the rural location. However, strategies to promote buildings with more efficient heating systems etc. are welcome.		<p>AGREED. Plan is weak on this and maybe we can get advice/ideas next time we meet. <b>In meantime we'll think about sustainable mitigation ideas and also Car Parking which is a major headache we haven't really addressed.</b> Any ideas really welcome.</p> <p><b>Will strengthen policy wording re heating systems</b></p> <p>New traffic generation and car parking policy now proposed</p> <p>Impact of new homes in our view is minor compared to other activities that generate traffic.</p>
Policy 15 ENV NE # Water Quality and Quantity			
Policy 16 ENV NE # Tranquility	FB: I think this could be joined up with the pollution policy, e.g. you already refer to noise pollution at that policy		<p><b>Will consider doing this following outcome of current consultation round.</b></p> <p>Would prefer to keep separate for simplicity and focus of tranquillity policy on AONB <b>landscape</b> impacts.</p>
			<b>Continued over</b>

Title / Policy	Comments	Suggested Change	Action Taken
Policy 17 ENV NE # Dark Skies	<p>FB: currently light pollution is one aspect of many which is taken into account within planning applications. Implementation in the NP since Holme is within the AONB seems to be a more suitable approach compared to a policy in the NP; “switched on only when needed” -&gt; enforcement? (besides notifications by neighbours or PC complaints)</p> <p>AG: changes in land use -&gt; some do not require planning permission. Could be over onerous for the BC to monitor and enforce.</p>		<p>Wording changed to ‘no dusk to dawn’ lamps.</p> <p>Would only expect enforcement in extreme cases. This policy responds to parishioner views and it sets a tone and approach which we can hope people will respect. Many second home owners do not appreciate the impact of unnecessary external lighting on dark rural skies which are a feature of the AONB.</p>
Policy 18 ENV NE # Protection of Views	<p>FB: I think a map showing the visual axis/corridors of these views useful.</p>	<p>Add map with visual axis/corridors</p>	<p>AGREED: Maps and photos have been produced – with view to inclusion in Policy supporting text.</p>
Policy 19 ENV NE # Advertising and Signage	<p>FB: unsure if that’s possible in a NP, since I would not see it as a traditional “land use policy”</p> <p>AG: NCP guidance -&gt; advise for additional guidance – not part of the policy</p>		<p>None at present – note recent planning application for more signs at Drove Orchards – which was refused. Maybe leave for Examiner to decide?</p> <p>Taken out of policy</p>
	<p>DM(HM/KL): This policy is useful to set out what will be expected for new signage proposals.</p>		<p>Leave for examiner to decide?</p>
Policy 20 SOC # New Homes	<p>FB: I would not word it as “infill or allocation” since as far as I am aware it should be infill and allocation if you decide to allocate land? Since I personally would not remove options for infill, replacement just because land is allocated somewhere</p>		<p>No circumstance will lead to removal or restriction of infill policy.</p> <p><b>If Parishioners vote for an allocation will restructure this policy.</b></p>

Title / Policy	Comments	Suggested Change	Action Taken
	AG: partially repetition (I – IV)		Agree: Will review when situation re Allocations is resolved early Jan. POLICY WILL NOW NEED RE_WRITING TO DEAL WITH PROPOSED ALLOCATION SITE
	DM(HM/KL): Need to clarify whether this only applies to sites within the development / settlement boundary. Preventing no more than 30% of the curtilage being developed is very restrictive.		Will discriminate between infill within the development envelope and the proposed site specific allocation which will contain a broad specification for the development.  Agree – increase to 40%
Policy 21 SOC # Replacement Dwellings	DM(HM/KL): Could potentially contradict the new homes policy and allow more than 30% of the curtilage to be developed if it is a small site. Specifying removal of pd rights is good.		Yes! - will add the 40% curtilage constraint
			Continued over

Title / Policy	Comments	Suggested Change	Action Taken
Policy 22 SOC # Extensions to existing dwellings, annexes and outbuildings	<p>DM(HM/KL):</p> <p>Need to bear in mind that permitted development rights allow for up to 50% of the total area of the curtilage (excluding the ground area of the original dwellinghouse) to be covered by extensions.</p> <p>Need to be clear whether you mean 'existing dwelling' or 'original dwelling'. 'Original dwelling' would be preferable. Current wording suggests that you could potentially get permission for an extension that allows for an increase of 40% GIFA, complete the works, then at a later date apply for a further increase of 40% on the GIFA of the previously extended dwelling.</p> <p>It would not be possible to remove permitted development rights of existing dwellings in order to control future extensions. It would only be possible to remove permitted development rights for the addition of further windows for example, on a new extension.</p>		<p><b>NEED HELP HERE!</b></p> <p>Presumably curtilage can cross development envelope where PDR applies?</p> <p><b>Yes – will substitute original dwelling</b></p>
Policy 23 SOC # Principal Residences	<p>FB: Council Tax Data (10/2017): 227 properties, 103 second homes (45.4%), as pointed out in the policy it just applies to replacement and new dwellings, therefore it does not reduce the current number of second homes.</p>		<p>Noted. Figures differ from those provided by Housing Strategy Team and our own analysis of Census data. Currently doing survey based on local knowledge to find final, defensible figure. Second home owners no longer have CT incentive to register as such therefore CT register is unreliable.</p>
SOC # Local Green Spaces			

Should you have any queries relating to the above, please contact

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## 20 APPENDIX 13 SEA AND HRA SCREENING REPORTS

**Borough Council of King's Lynn & West Norfolk screening report of the requirements for a Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA) for the emerging Holme next-the-Sea Neighbourhood Plan**

**June 2019**

**Borough Council of  
King's Lynn &  
West Norfolk**



**Borough Council of King's Lynn & West Norfolk preliminary screening report for a Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA) for the emerging Holme next-the-Sea Neighbourhood Plan**

**1. Introduction**

- 1.1 This screening report is designed to determine whether or not the content of the emerging Holme next-the-Sea Neighbourhood Plan requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004. A SEA would be required if the implementation of the contents of the Neighbourhood Plan are likely to cause significant environmental effects.
- 1.2 This report will also determine whether or not the contents of the Neighbourhood Plan require a Habitats Regulations Assessment (HRA) in accordance with Article 6 (3) of the EU Habitats Directive and with Regulation 61 of the Conservation of Habitats and Species Regulations 2010 (as amended). A HRA would be required when the implementation of the contents of the Neighbourhood Plan are likely to cause significant negative effects on a designated protected European Site (Natura 2000 sites).
- 1.3 This report is based upon the screening opinion request and information provided on the emerging content of the Plan as provided by the Parish Council (May 2019) and the screening opinion consultation responses received from the Environment Agency, Historic England and Natural England (June 2019).
- 1.4 To avoid any doubt, this does not affect the Borough Council's obligation to provide further advice on later stages of the emerging Neighbourhood Plan/SEA process which may subsequently arise if there are changes to the plan's content that could have an adverse effect upon the environment.



## 2. Legislative Background

- 2.1 **Strategic Environmental Assessment (SEA)** - The European Directive 2001/42/EC is the basis for Strategic Environmental Assessments and Sustainability Appraisal legislation, which was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations.
- 2.2 If a neighbourhood plan is likely to cause significant negative environmental effects, it is necessary to undertake a SEA assessment in line with the SEA regulations. To fulfil the legal requirements to identify if a neighbourhood plan requires a SEA; a screening for a SEA has to be undertaken.
- 2.3 **Habitat Regulation Assessment (HRA)** - It is required by Article 6 (3) of the EU Habitats Directive and by regulation 61 of the Conservation of Habitats and Species Regulations 2010 (as amended) that an appropriate assessment is carried out with regard to the Conservation Objectives of the European Sites and with reference to other plans and projects to identify if any significant effect is likely for any European Site.
- 2.4 To fulfil the legal requirements to identify if likely significant effects will occur with the implementation of a neighbourhood plan upon the European Sites (Natura 2000 sites) a screening assessment has been undertaken

### 3. SEA Preliminary Screening

- 3.1 The process for determining whether or not an SEA is required is called screening. The SEA screening is a two stage interrelated process. The first part considers the Neighbourhood Plan against the SEA assessment flow chart set out in the national guidance "A Practical Guide to the Strategic Environmental Assessment Directive", (Paragraph 2.18, Figure 2, ODPM, 2005). The second part of the assessment is required in order to answer specific questions contained in the above, specifically question 8 and considers whether the Neighbourhood Plan is likely to have a significant effect on the environment, using criteria drawn from the EU SEA Directive and Schedule 1 of the UK Environmental Assessment of Plans and Programmes Regulations 2004.
- 3.2 The regulations state that before making a determination the three statutory consultation bodies must be consulted. Accordingly they have been consulted upon the Borough Council's preliminary opinion (May 2019) and their comments have been taken into consideration within this screening report.
- 3.3 The process taken follows the application of the SEA Directive as set out in Figure 2 of 'A practical guide to the Strategic Environmental Assessment Directive' followed by application of the criteria determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC (Annex 11) and Schedule 1 of the UK Environmental Assessment of Plans and Programmes Regulations 2004:

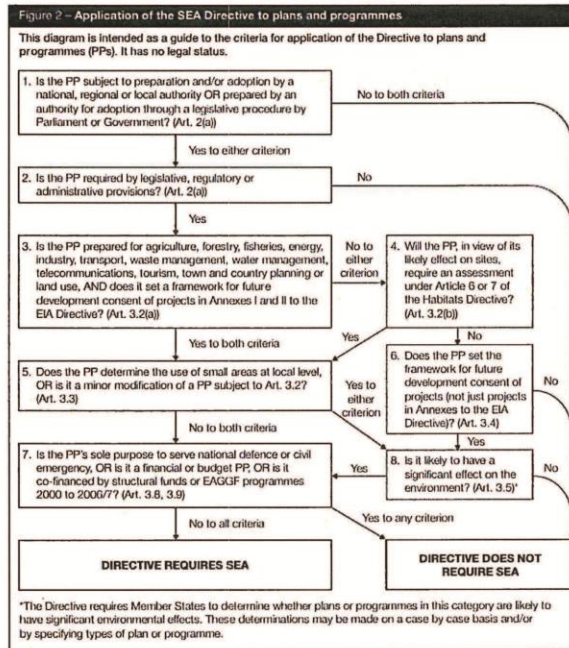


Table 1: Criteria for determining the likely significance of effects

<ol style="list-style-type: none"><li>1. The characteristics of plans and programmes, having regard, in particular, to<ul style="list-style-type: none"><li>• the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources</li><li>• the degree to which the plan or programme influences other plans and programmes including those in a hierarchy</li><li>• the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development, - environmental problems relevant to the plan or programme</li><li>• the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection)</li></ul></li> <li>2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to<ul style="list-style-type: none"><li>• the probability, duration, frequency and reversibility of the effects,</li><li>• the cumulative nature of the effects</li><li>• the trans-boundary nature of the effects</li><li>• the risks to human health or the environment (e.g. due to accidents)</li><li>• the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)</li><li>• the value and vulnerability of the area likely to be affected due to:<ul style="list-style-type: none"><li>• special natural characteristics or cultural heritage</li><li>• exceeded environmental quality standards or limit values</li><li>• intensive land-use</li></ul></li><li>• the effects on areas or landscapes which have a recognised national, Community or international protection status</li></ul></li></ol>
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Source: Annex 11 of SEA Directive 2001/42/EC and Schedule 1 of the UK Environmental Assessment of Plans and Programmes Regulations 2004

#### 4. Assessment

##### 4.1 Application of the SEA Directive to plans and programmes:

Stage	Yes/No	Reason
1. Is the Neighbourhood Plan subject to preparation and/or adoption by national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Yes	<p>The preparation and adoption of the Neighbourhood Plan is allowed under the Town and Country Planning Act 1990 as amended by the Localism Act 2011. The Neighbourhood Plan is being prepared by the Parish Council (as the "relevant body") and will be "made" by the Borough Council of King's Lynn and West Norfolk as the Local Authority subject to passing an independent examination and community referendum. The preparation of Neighbourhood Plans are subject to the following regulations (not intended to be a complete list):</p> <ul style="list-style-type: none"> <li>• The Neighbourhood Planning (General) Regulations 2012</li> <li>• The Neighbourhood Planning (referendums) Regulations 2012</li> <li>• the Neighbourhood Planning (General)(Amendment) Regulations 2015</li> <li>• the Neighbourhood Planning (General)and Development Management Procedure (Amendment) Regulations 2016</li> <li>• The Neighbourhood Planning (General) and Development Management Procedure (Amendment) Regulations 2017</li> </ul>
2. Is the Neighbourhood Plan required by legislative, regulatory or administrative provisions? (Art. 2(a))	Yes	<p>Whilst the Neighbourhood Plan is not a requirement of the Town and Country Planning Act as amended by the Localism Act 2011, it will be "made" and eventually form part of the Development Plan for the Borough. These are directed by legislative processes and it is important that the screening process considers whether it is likely to have significant environmental effects and hence whether SEA is required under the Directive.</p>
3. Is the Neighbourhood Plan prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future	Yes	<p>A Neighbourhood Plan can include these policy areas and could provide, at a Neighbourhood Area level, the framework for development that would fall within Annex II of the EIA Directive. Developments that fall within Annex I are 'excluded' development for Neighbourhood Plans (as set out in the Localism Act 2011 and Section 61(k) of the Town and Country Planning Act 1990 (as subsequently amended).</p> <p>The Neighbourhood Plan is being prepared to set out a</p>

development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))		<p>framework for town and country planning and land use within the Parish of Holme next-the-Sea. Its intention is to complement the higher order strategic framework that already exists for land use planning across the Borough.</p> <p>The strategic framework for development is set by the adopted Core Strategy (2011) and the Site Allocations and Development Management Policies Plan (2016) of the Borough Council of King's Lynn and West Norfolk. The Neighbourhood Plan seeks to align and be in general conformity with these. The Neighbourhood Plan does not anticipate being the tool to manage development of the scale and nature envisaged by Annex I and Annex II of the EIA Directive.</p>
4. Will the Neighbourhood Plan, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2(b))	No	A Neighbourhood Plan could potentially have impacts on sites covered by the Habitats Directive. Please see Section 4 of this report which goes into some detail in relation to this.
5. Does the Neighbourhood Plan determine the use of small areas at local level, OR is it a minor modification of a plan or project subject to Art. 3.2? (Art. 3.3)	No	Whilst a Neighbourhood Plan can determine the use of small areas at a local level. The Neighbourhood Plan for Holme next-the-Sea appears to be in conformity with the Borough's Local Plan and proposals could be described as minor.
6. Does the Neighbourhood Plan set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art. 3.4)	Yes	Once "made" a Neighbourhood Plan forms part of the statutory Development Plan and will be used by the Borough Council of King's Lynn and West Norfolk in the determination of planning applications. The intention is that the Neighbourhood Plan will provide a land use policy framework for future development at a local level.
7. Is the plan or programme's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget plan or programme, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/07? (Art. 3.8, 3.9)	No	Does not apply to a Neighbourhood Plan.
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	No	The Neighbourhood Plan seeks general conformity with the adopted Core Strategy (2011) and the Site Allocations and Development Management Policies Plan

	<p>(2016) Development Plan Documents and has regard to the emerging Local Plan review. From the application of criteria for determining the likely significant effects below it is considered it is unlikely that there will be significant effect.</p>
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4.2 SEA Screening Stage 2: SEA Directive Article 3(5) Annex II – Application of Criteria for determining the likely significance of effects of a Neighbourhood Plan:

Criteria in Annex 11 of the SEA Directive	Response	Is there a significant effect
<b>(1) Characteristics of the plan and programmes, having regard in particular, to:</b>		
The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size, and operating conditions or by allocating resources;	<p>The strategic framework for development is set by the adopted Local Plan of King's Lynn and West Norfolk Borough Council which currently comprises the Core Strategy (2011) and the Site Allocations and Development management Policies Plan (2016). The Borough Council are currently in the process of reviewing the Local Plan.</p> <p>The Neighbourhood Plan seeks to align and be in general conformity with this.</p>	No
The degree to which the plan or programme influences other plans or programmes including those in a hierarchy;	The Neighbourhood Plan will be adopted alongside the higher order Local Plan and form part of the Borough's Development Plan. The Neighbourhood Plan will expand upon some of the Local Plan and emerging Local Plan policies, providing supplementary information on a local scale.	No
The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	<p>The basic conditions which a Neighbourhood Plan must meet (summarised):</p> <ul style="list-style-type: none"> <li>• having regard to national policies and advice / guidance</li> <li>• having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses</li> <li>• having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area</li> <li>• contributes to the achievement of sustainable development.</li> <li>• is in general conformity with the strategic policies contained in the development plan for the area</li> <li>• does not breach, and is otherwise compatible with, EU obligations.</li> <li>• prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan</li> <li>• the plan does not breach the requirements</li> </ul>	<p>No anticipated negative effects</p> <p>Anticipated positive effect</p>



	<p>of Chapter 8 of Part 6 of the Conservation of Habitats and Species regulations 2017</p> <p>The emerging neighbourhood plan contains a strong package of policies aimed at protecting and enhancing the natural and historic environment (please see the plan for details)</p> <p>The emerging neighbourhood plan seeks to make a minor site allocation for 5 dwellings and allows for infill development, this is in line with the current and emerging Local Plan</p>	
Environmental problems relevant to the plan or programme;	<p>Main issues (summarised):</p> <p>The Shoreline Management Plan (SMP) anticipates a 'major negative' impact of sea level rise on the Parish's EU and internationally protected sites. Resulting in 42% of the Parish reverting to intertidal mud flats. Around 80 properties are threatened along the coastal frontage.</p> <p>The Protected Sites are considered to be at their carrying capacity in terms of visitor pressure as witnessed by traffic growth, walker/dog numbers, noise and pollution.</p> <p>There is clear evidence that poor water quality in the River Hun is damaging qualifying features of the Protected sites. There is a clear pathway linking sewage disposal from Holme with the sites and the affected qualifying features.</p> <p>Avian biodiversity is showing evidence of decline.</p> <p>The Neighbourhood Plan through a package of policies will seek to address these issues, in so far as it possibly can.</p>	<p>No anticipated negative effects.</p> <p>Anticipated positive effects</p>
The relevance of the plan or programme for the implementation of community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).	The implementation of community legislation is unlikely to be significantly compromised by the Neighbourhood Plan	No

<b>(2) Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:</b>		
The probability, duration, frequency, and reversibility of the effects;	<p>Floods in 2013 and the Environment Agency policy of managed realignment for Holme Dunes means there is a very real probability of SMP impacts being felt during the Plan period. The effects of a large scale surge event may not be reversible.</p> <p>Visitor pressure, pollution and falling biodiversity are long term, ongoing problems that will continue to get worse unless decisive and effective action is taken. This is characterised by summer peaks. Water quality problems are linked to high rainfall events and visitor numbers. Biodiversity decline is an ongoing process.</p> <p>The entire Parish is affected – but especially the Village, Holmes Dunes NNR and the Protected Sites.</p> <p>The Plan seeks to adopt a precautionary planning approach to dealing with effects of the SMP by the creation of an adaptation and resilience zone. It also seeks to reduce development and associated risk in areas likely to be affected.</p> <p>The adaptation and resilience zones will provide a vehicle for diffusing and spreading the effects of visitor pressure on the Village and the Protected Sites.</p> <p>The Plan seeks to introduced a water quality policy which will attempt to reduce the impact of pollution by ensuring adequate sewage disposal infrastructure before development can proceed</p>	Positive
The cumulative nature of the effects;	The environmental problems affecting the Parish are cumulative and linked. The policy package which the Plan seeks to introduce addresses the issue of cumulative affects where possible.	Positive effect
The trans-boundary nature of the effects;	<p>The impacts of visitor pressure, and pollution (especially water quality, noise and light) on habitats has the capacity to impact on the Natura 2000 network of EU sites thereby having both national and international effects.</p> <p>The Neighbourhood Plan aims to reduce pollution and protect habitats (see Plan for details)</p>	Positive effect
The risks to human health or the environment (e.g. due to accidents);	Declining water quality poses a risk to human health. The Plan policies aim to improve water quality and can be expected to reduce this risk.	Positive effect

	<p>The SMP highlights a risk to property and humans health from sea level rise and flooding. The Plan aims to reduce this.</p> <p>Growth in traffic poses a risk of increasing accidents. The Plan aims to reduce car trip generation and traffic impact.</p>	
The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	The Neighbourhood Plan covers the Parish of Holme next-the-Sea. The 2011 census recorded the population at 239 and the Parish covers an area of 882 ha. In comparison the Borough of King's Lynn and West Norfolk is 152,760 ha and has population of 147,451 (2011 census). Although it should be noted the area is subject to a large number of visitors.	No
<p>The value and vulnerability of the area likely to be affected due to:</p> <p>i) Special natural characteristics or cultural heritage;</p> <p>ii) Exceeded environmental quality standards or limit values</p> <p>iii) Intensive land use</p>	<p>The area is highly sensitive in environmental terms. The Designations report which supports the Plan set this out.</p> <p>The Economy report highlights the underpinning importance of Holme's natural capital and ecosystem services to its economy</p> <p>The Environment / Biodiversity Report and the Heritage Report set out its properties as a very special place in this context.</p> <p>Water quality falls below WFD standards across the HUN catchment and is also very poor in standing water lagoons within the EU protected sites, Nitrates and phosphates are a particular issue. The Parish is within a nitrate sensitive zone.</p> <p>The Plan does attempt to address these issues, as far as is possible</p>	Positive effects
The effects on areas or landscapes which have a recognised national, Community or international protection status	The Neighbourhood Plan has been designed to help reverse cumulative deterioration in the environment on internationally protected sites. It has specific policies designated to protect and enhance its AONB landscape (see plan for further details).	Anticipated positive effect

## 5. Habitat Regulations

- 5.1 The Habitats Regulations Assessment (HRA) refers to the assessment required for any plan or project to assess the potential impacts against the conservation objectives of Natura 2000 wildlife sites. The assessment must determine whether the plans would adversely affect, or are likely to affect, the integrity of a site(s) in terms of its nature conservation objectives. Where negative effects are identified other options should be examined to avoid any potential damaging effects.
- 5.2 The HRA process is generally divided into three stages. The initial stage of the HRA process is called the screening stage and determines if there are any likely significant effects or risk of significant effects possible as a result of the implementation of the plan. If there are significant effects the plan will need to undertake an Appropriate Assessment. The screening process should provide a description of the plan and an identification of the Natura 2000 sites which may be affected by the plan and assess the significance of any possible effects on the identified sites
- 5.3 The Designated Sites (including Natura 2000 wildlife sites) within the Neighbourhood Plan Area:
- North Norfolk Coast Ramsar Site (covers 42% of the NPA)
  - North Norfolk Site of Special Scientific Interest (SSSI) (covers 42% of the NPA)
  - North Norfolk Coast Special Area of Conservation (SAC – European significance) (covers 34% of the NPA)
  - North Norfolk Coast Special Protection Area (SPA – European significance) (covers 41% of the NPA)
  - Norfolk Coast Area of Outstanding Natural Beauty (AONB – national significance) (100% of the NPA)
  - North Norfolk Heritage Coast (national significance) (covers 60% of the NPA)
  - Holme Dunes National Nature Reserve (national significance)
  - The Wash and North Norfolk European Marine Sites (EMS)
- 5.4 It is clear that there are a number of designations within the Neighbourhood Plan Area and that in total some 42% of the NPA is protected by plans and legislation. And the AONB covering the entire NPA. The Neighbourhood Plan must take this into account and ensure that policies are consistent with the designation objectives.
- 5.5 The Holme next-the-Sea Neighbourhood Plan contains a strong package of policies which aim at protecting and enhancing the natural environment. This has been carefully and thoughtfully crafted with expert skill recognising what a special and rather unique place Holme next-the-Sea actually is. The extensive Neighbourhood Plan and its 24 policies have been all designed with a keen eye for detail with regard to the natural environment any likely positive or negative impacts. There is also an extensive library of

supporting and background documents which together with the Neighbourhood Plan itself provide a comprehensive approach to the subject.

5.6 The plan starts from a high level and drills down into greater detail. A zoning approach has been utilised this defines the distinct areas of the Parish and these designed to help guide and shape development. They are Holme Village, the Protected Sites, an Adaptation and Resilience Zone, the Countryside and Drove Orchards. Rather than attempt to crudely summaries each policy a list is provided below of these which have had due care and consideration to the Protected Sites, note this is every policy:

- POLICY HNTS 1: Principle of sustainable development POLICY HNTS 2: Holme Village Zone
- POLICY HNTS 3: Protected Sites
- POLICY HNTS 4: Adaptation and Resilience Zone
- POLICY HNTS 5: Countryside Zone
- POLICY HNTS 6: Drove Orchards
- POLICY HNTS 7: Natural capital and ecosystem services
- POLICY HNTS 8: Sustainable travel and tourism
- POLICY HNTS 9: Touring and permanent holiday accommodation
- POLICY HNTS 10: Overall form and pattern of settlement
- POLICY HNTS 11: Street scene, character and residential environment
- POLICY HNTS 12: Conservation Area policy
- POLICY HNTS 13: New homes
- POLICY HNTS 14: Replacement dwellings
- POLICY HNTS 15: Extensions, annexes and outbuildings
- POLICY HNTS 16: Principal residences
- HNTS POLICY 17: Local Green Space
- POLICY HNTS 18: Heritage Assets
- POLICY HNTS 19: AONB landscape quality
- POLICY HNTS 20 : Advertising and signage
- POLICY HNTS: 21 Biodiversity
- POLICY HNTS 22: Pollution
- POLICY HNTS 23: Water resource management
- POLICY HNTS 24: Traffic and car parking

- 5.7 This has been carefully balanced with the need to support sustainable development (HNTS 1) which results in the plan continuing to support sensitive infill development (most likely replacement dwellings, development of brownfield sites or the conversion of current/formal agricultural buildings) on a scale similar to historic levels within the proposed development area. In order to attempt to ensure the right type of housing is provided, i.e. that which meets the identified local need (based upon research which underpins the Plan) a small site is proposed for allocation which provide a minor development of 5 relatively small 2/3 bedroom homes (approx. 80 - 120m<sup>2</sup> gross internal floor space with single garage).
- 5.8 Whilst clearly any new housing could have the potential to result in likely significant effects on the protected sites identified. It is considered that this minor increase in homes over a 20 year period (the majority of which would likely take place as organic growth over time without the plan in place) it is likely to be a very small increase based upon the development which could come forward at other larger settlements along the North Norfolk Coastline.
- 5.9 A 'Habitats Regulations Assessment of Detailed Policies and Sites Plan: Site Allocations and Development Management Policies – Proposed Submission Document' was carried out and published in September 2015 by Wild Frontier Ecology to support the Local Plan (Site Allocations and Development Management Policies 2016). This considered the impacts of the housing growth arising from the Local Plan and the likely significant impacts upon the Natura 2000 sites. Although no sites were proposed at this time for Holme next-the-Sea, the level of growth now proposed through the neighbourhood plan, as previously discussed, is relatively minor and therefore would be in conformity with the Local Plan which allows for modest levels of development to meet local needs and maintain the vitality of these communities in a sustainable manner. (CS02, CS06, CS09, CS12).
- 5.10 After careful consideration and on balance based upon the extensive and detailed information within this context the Parish Council has not only produced as part of their emerging Neighbourhood Plan but as supporting documents, and given that the Neighbourhood Plan will be in general conformity with the Local Plan it is considered unlikely that a HRA will need to be undertaken. In general it is noteworthy, that if a HRA is necessary automatically also a SEA has to be undertaken.

## 6. Screening Outcome

- 6.1 The Borough Council prepared a preliminary screening opinion (May 2019). The statutory bodies, the Environment Agency, Historic England and Natural England, as required within the SEA and HRA screening process, were consulted upon this (13/05/2019 – 10/06/2019). The consultation responses of the statutory bodies have underpinned the Local Planning Authority's evaluation and conclusions. The statutory bodies' consultation responses are appended in full to this report. (please note that further detailed correspondence from Natural England was received 11/06/2019, for completeness this is also appended).
- 6.2 The assessments contained within this report are based upon the Borough Council's preliminary screening opinion and the consultation responses received from the statutory bodies. They clearly identify that, based upon the information available; there is not the potential for significant environmental effects to arise from the implementation of the proposals in the emerging Neighbourhood Plan for Holme next-to-Sea.
- 6.3 After careful consideration and on balance the Borough Council agrees with the opinions of the statutory bodies and therefore:
- The Holme next-the-Sea Neighbourhood Plan does not require a Strategic Environmental Assessment (SEA).**
- The Holme next-the-Sea Neighbourhood Plan does not require a Habitats Regulation Assessments (HRA).**
- 6.4 This report is based on the screening request made by the Parish Council (May 2019). The Neighbourhood Plan at this stage is emerging. The outcome of this screening report will be subject to review by Natural England, Historic England and the Environment Agency. The screening opinion and report may also need to be reviewed if changes are made to the Neighbourhood Plan.
- 6.5 This report will be issued to the Parish Council, and in line with the requirements, Historic England, Natural England and the Environment Agency. A copy of the report must also be submitted with the Neighbourhood Plan proposal and made available to the independent examiner

Report agreed by:



.....  
Geoff Hall, Executive Director Environment and Planning

24/06/2019.

.....  
Date



## Appendix: Statutory Body Consultation Responses

**From:** Anglian Central, Planning\_Liaison [mailto:planning.brampton@environment-agency.gov.uk]  
**Sent:** 30 May 2019 12:17  
**To:** Clare Robinson  
**Subject:** RE: Statutory consultation Holme-next-the-Sea PC Neighbourhood Plan SEA/HRA Screening: "SEA & HRA requirements of the NP"

Dear Clare

Thank you for your request for a screening opinion.

Due to resource pressures we are no longer able to provide you with bespoke advice on screening opinions. If there is a specific issue that you require our expert advice on before issuing the screening opinion then please contact us with details and we will endeavour to assist you. We remain a statutory consultee for scoping opinions so please continue to submit these for our review and comments.

Below is a link to our developers guidance entitled 'Building a better environment' this sets out our role in development and how we can help.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/289894/LIT\\_2745\\_c9ed3d.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/289894/LIT_2745_c9ed3d.pdf)

We have also published a webpage for [Neighbourhood Planning Groups](#) that gives clarification on our planning consultation role.

If you have any further queries please do not hesitate to contact us.

Kind regards  
Elizabeth

Elizabeth Mugova  
Sustainable Places  
East Anglia Area (West)

Sustainable Places Team, Bromholme Lane, Brampton, Huntingdon, Cambs. PE28 4NE  
**Phone:** 020 8474 5242  
**Direct Dial:** 020 3025 5999  
**Email:** [planning.brampton@environment-agency.gov.uk](mailto:planning.brampton@environment-agency.gov.uk)

**From:** Wight, Victoria [<mailto:Victoria.Wight@naturalengland.org.uk>]  
**Sent:** 10 June 2019 15:20  
**To:** Clare Robinson  
**Subject:** RE: 2019-06-24 282328 Holme-next-the-Sea NDP SEA & HRA (Kings Lynn & West Norfolk)

Dear Claire

Thank you for consulting Natural England. We understand that Holme Neighbourhood Plan allocates one site for development which will accommodate 5 residential dwellings. This allocation aligns with the emerging Local Plan which is currently being assessed under the Habitat Regulations. On this basis we agree with the conclusions of the preliminary screening opinion of the SEA and HRA.

If you have any questions please do get in touch.

Many thanks  
Victoria

Sustainable Development Lead Adviser  
Natural England  
2 Gilders Way, Norwich  
NR3 1UB  
Mobile: 07786335079  
Tel: 02082257617  
<https://www.gov.uk/natural-england>

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**From:** SM-NE-Consultations (NE) [mailto:[consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)]  
**Sent:** 11 June 2019 12:54  
**To:** Clare Robinson  
**Subject:** Holme-next-the-Sea PC Neighbourhood Plan SEA/HRA Screening - Natural England response  
**Importance:** High

Dear Clare

Please find Natural England's response in relation to the above mentioned consultation attached herewith.

Kind regards

Jacqui Salt  
Natural England  
Consultation Service  
Hornbeam House  
Crewe Business Park  
Electra Way,  
Crewe  
Cheshire, CW1 6GJ

Enquiries line: 0300 060 3900  
Email: [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)  
[www.gov.uk/natural-england](http://www.gov.uk/natural-england)

Date: 11 June 2019  
Our ref: 282328  
Your ref: Holme-next-the-Sea Neighbourhood Plan



Clare Robinson  
Borough Council of King's Lynn & West Norfolk  
[clare.robinson@west-norfolk.gov.uk](mailto:clare.robinson@west-norfolk.gov.uk)

Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Clare

#### Holme-next-the-Sea Neighbourhood Plan SEA/HRA Screening

Thank you for your consultation on the above dated 13 May 2019 which was received by Natural England on 13 May 2019

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

#### Strategic Environmental Assessment (SEA) Screening

It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.

#### Neighbourhood Plan

Guidance on the assessment of Neighbourhood Plans, in light of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended), is contained within the [National Planning Practice Guidance](#). The guidance highlights three triggers that may require the production of an SEA, for instance where:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.

We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.

Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

**Habitats Regulations Assessment (HRA) Screening**

Natural England agrees with the report's conclusions that the Holme-next-the-Sea Neighbourhood Plan would not be likely to result in a significant effect on any European Site, either alone or in combination and therefore no further assessment work would be required.

For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Jacqui Salt  
Consultations Team

From: [Edward.James@HistoricEngland.org.uk](mailto:Edward.James@HistoricEngland.org.uk) [mailto:[Edward.James@HistoricEngland.org.uk](mailto:Edward.James@HistoricEngland.org.uk)]  
Sent: 10 June 2019 16:09  
To: Clare Robinson  
Subject: Historic England advice on case PL00582386

Dear Ms Robinson,

I am writing in relation to the following:

EIA: Environmental Impact Assessment  
Holme-next-the-Sea Neighbourhood Plan, Holme-next-the-Sea, Norfolk [Case Ref. PL00582386; HE File Ref. HD/; Your Reference.]

Thank you for consulting Historic England regarding this SEA Screening. Please find our response attached.

Yours Sincerely

Edward James  
Historic Places Advisor, East of England  
E-mail: [Edward.James@HistoricEngland.org.uk](mailto:Edward.James@HistoricEngland.org.uk)  
Direct Dial: 01223 582746



Ms Clare Robinson  
Borough Council of King's Lynn & West Norfolk  
Chapel Street  
KING'S LYNN  
Norfolk  
PE30 1EX

Direct Dial: 01223 582746

Our ref: PL00582386

10 June 2019

Dear Ms Robinson

**RE: Holme-next-the-Sea Neighbourhood Plan SEA Screening**

Thank you for your email of 14 May 2019 regarding the above consultation. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome this opportunity to review the Screening Report for this plan. For the purposes of this consultation, Historic England will confine its advice to the question, "Is it (the Holme-next-the-Sea Neighbourhood Plan) likely to have a significant effect on the historic environment?". Our comments are based on the information supplied with the Screening Opinion.



The Screening Report indicates that the Council considers that the plan will not have any significant effects on the historic environment. We note that the plan does propose to allocate a site for small scale development of up to 5 residential units, on a site adjacent to the boundary of the conservation area. However, we consider that the scale of the development, as well as the clear and robust policy provision for the site's development in the neighbourhood plan including the protection of the conservation area, means that it is unlikely to harm the significance of the conservation area owing to development in its setting.

On the basis of the information supplied, and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations [Annex II of 'SEA' Directive], Historic England concurs with the Council that the preparation of a Strategic Environmental Assessment is not required.

The views of the other two statutory consultation bodies should be taken into account before the overall decision on the need for an SEA is made.

I should be pleased if you can send a copy of the determination as required by REG 11 of the Environmental Assessment of Plans and Programmes Regulations 2004.

We should like to stress that this opinion is based on the information provided by you with your correspondence dated 14 May 2019. To avoid any doubt, this does not

	24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 3BU Telephone 01223 582749 HistoricEngland.org.uk	
<small>Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation.</small>		

reflect our obligation to provide further advice on later stages of the SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan/guidance) where we consider that, despite the SEA, these would have an adverse effect upon the environment.

Historic England strongly advises that the conservation and archaeological staff of the relevant local authorities are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER), how the allocation, policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,



Edward James  
Historic Places Advisor, East of England  
Edward.James@HistoricEngland.org.uk

cc:



## **PUBLIC NOTICE**

### **HOLME-NEXT-THE-SEA NEIGHBOURHOOD PLAN**

#### **PRE-SUBMISSION CONSULTATION**

In accordance with the 2011 Localism Act and any subsequent amendments and additions to legislation, Holme-next-the-Sea Parish Council announces that the Pre-Submission Draft Neighbourhood Plan will be available for consultation from **26 June – 7 August 2019**

The Draft Plan and form for comments will be available online at

<http://www.holme-next-the-sea-plan.co.uk>

and in hard copy at Hunstanton Library and St Mary's Church in Holme.

Your attention is drawn to the closing date for comments which is 7 August 2019 and not as previously advertised. All comments must be received by 5pm on this date.

All correspondence to Christina Jones, NDP Project Co-ordinator by email to

[ndp@holmentspc.org](mailto:ndp@holmentspc.org)

or by post to 27B Homefields Road, Hunstanton PE36 5HL.

## 22 APPENDIX 15: EXPLANATORY BROCHURE FOR REGULATION 14 CONSULTATION

Holme-next-the-Sea Parish Council

### HOLME-NEXT-THE-SEA NEIGHBOURHOOD PLAN 2016-2036

#### Quick Guide to the Pre-Submission Consultation Draft

June 2019



#### Why is the Draft Plan important to you?

Once adopted our Neighbourhood Plan will become part of the Local Development Framework for Kings Lynn and West Norfolk and the policies it contains will be used in the determination of planning applications. It is very important therefore that it reflects the consensus view of our community and provides a solid foundation for a sustainable future.

The Pre-Submission Consultation Draft represents a chance to have one more say on the content of the Plan before it is formally submitted to the Borough Council and proceeds to independent examination and thereafter to referendum. Turn over to find out more.

#### Please support the Neighbourhood Plan

Let us know what you think!

## **The Background**

Holme-next-the-Sea is a very special place with a wonderful environment, a small but active and cohesive community plus a thriving economy.

Although Holme is a small parish, it faces significant challenges. Amongst these the resident population is coming under increasing pressure from external competition in the housing market, visitor pressure is mounting and our environment and property face threats from climate change and sea level rise. Increases in traffic, noise and falling biodiversity are all linked to these trends.

## **What can the Neighbourhood Plan do?**

The Neighbourhood Plan provides a real opportunity to help to respond to these issues and for the whole community to develop a shared vision for the future. This means influencing the type and location of new development, how buildings should be laid out and what they should look like. It also means ensuring that our businesses can continue to thrive and that new people can join our community and become residents of our Parish. It means protecting our precious natural environment including green spaces and historic assets and most of all it means that both we and future generations can continue to enjoy the exceptional quality of life that Holme has offered in the past. Looking to the future it is inevitable that Holme will change. The Plan must ensure that it changes in a way that suits the needs and aspirations of our community and prevents unwelcome and inappropriate change from being thrust upon us.

## **How did we get here?**

The Pre-Submission Draft Plan represents the outcome of three year's work by a Parish Council Working Party. During that time an enormous amount of research has been carried out to inform the development of the Plan, we have consulted widely with stakeholders and we have received help and support from very many people. The policies have been designed to reflect the very specific circumstances in our Parish and we have carefully considered all of the advice and comments that we have received throughout that time. We believe that the Draft Plan and the policies it contains are well balanced and grounded in solid evidence.

## **Do the policies reflect my previous comments?**

Yes. You will see a number of changes and additions to the policies that we consulted on in 2018. The revised policies closely reflect the feedback from our community as expressed through the NDP Questionnaire Survey and the consultation events held in 2017 and 2018.

**If you have further ideas or suggestions there is still time to let us know – turn to the back page to find out how to do this.**

## How can I find out more about the Plan?

There are three main ways to find out more about the Pre-Consultation Draft Plan: Via the Neighbourhood Plan website, by reference to printed copies and by attending a Drop-In session and exhibition to be held in the Village Hall in July. See the back page for details.

If you need help in accessing the Plan or getting to the Drop-In session, please contact Christina Jones by email to: [ndp@holmentspc.org](mailto:ndp@holmentspc.org) or Tel 01485 535065.

## What's in the Plan?

The main plan is divided into three parts:

- **Part A – Introduction and Background to the Parish:** Here you will find an introduction to neighbourhood planning and a good deal of background information about the Parish. This includes information about changes in our community, housing, the economy and our heritage. Much of this is based on original research so may be new to you. There is also a good deal of information about our environment including a report on the findings from our investigation into water quality on the Hun. Part A concludes with a section summarising the issues and opportunities facing the Parish and identifies pointers to the way ahead.

- **Part B – The Policies:** Presents the Vision for the development of the Parish and sets out the objectives that we've set for the Plan and the approach that has been adopted. This is followed by 24 policies which are organised into Area-Specific (Zoning) and Area-Wide (General, Economic, Social and Environmental). Each policy wording is preceded by a short statement describing its purpose and is followed by supporting text which provides background together with brief justifications.

There are new policies on the countryside, footpaths, tourism, new homes and traffic & car parking. All of these have been influenced by the feedback from earlier consultations. In addition there are changes to many of the earlier draft policies to reflect your concerns and comments. These include modifications to reflect concerns about the scale of development, the impacts of new development on residential amenity and the street-scene, the protection of views and the protection of the AONB landscape and parish environment.

Part B of the Plan is long and quite technical so we've tried to illustrate points by using photographs where possible.

- **Part C – Glossary of Terms:** The glossary in the last part of the Plan is intended to help with the interpretation of some of the more technical terms used to help answer some of the questions we received at the January 2018 consultation. We hope it will be useful.

In addition a number of supporting documents can be found on the website. Together these form the evidence library for the Plan. Topics covered include results from the Neighbourhood Plan Questionnaire Survey, the socio-economic profile of the Parish, the parish economy, heritage, housing, environment, landscape and biodiversity and water quality.

### **About the Pre-Submission Draft Consultation Plan**

This version of the Draft Plan sets out the preferred approach and proposed policies which incorporate feedback from extensive consultations during the past three years. Most recently the Plan has been subjected to a screening process during which it was reviewed by the Borough Council and the Statutory Consultees (Natural England, Historic England and the Environment Agency) in order to determine whether it would have any significant environmental effects. The outcome of this process indicated that, as the emerging plan stands, neither a Strategic Environmental Assessment nor a Habitats Regulations Assessment would be required.

The Parish Council must now publicise and consult on the Draft Plan for a period of at least six weeks in order to bring it to the attention of people who live, work or carry on business in the Neighbourhood Area.

### **Consultation Arrangements**

The Draft Plan will be available for consultation from **26 June to 07 August 2019**. The Plan, plus supporting documents and the form for comments will be available on the Draft Plan page of the Neighbourhood Plan Website <http://www.holme-next-the-sea-plan.co.uk>.

Printed versions of the Plan and Comments Forms will also be available at Hunstanton Library, St Mary's Church in Holme-next-the-Sea and at a Drop-In event to be held in July (see below).

The Comments Forms can be downloaded for completion from the Neighbourhood Plan website and emailed to: Christina Jones, NDP Project Co-ordinator at [ndp@holmentspc.org](mailto:ndp@holmentspc.org).

Alternatively, hard copy forms can be returned by post to Christina at 27B Homefields Road, Hunstanton PE36 5HL. Further information is available via the NDP website.

**Please note that all comments must be made by 07 August 2019.**

### **Drop-In Event and Exhibition**

During the consultation period a public drop-in event will be held in Holme-next-the-Sea Village Hall, Kirkgate on **Saturday 20th July from 2pm – 6.30pm**. This will provide an opportunity to discuss the content of the Neighbourhood Plan with the NDP Team and members of the Parish Council. Copies of the Draft Plan and Comments Forms will be available on the day and we will be mounting an exhibition with displays including proposed policies, maps and supporting information.

**Please do come along and join us then!**

### **What happens next?**

Following the consultation period we will consider all comments that have been received and determine whether changes to the Pre-Submission Draft are necessary. The Plan will then be submitted to the Borough Council and will be the subject of an independent examination to check whether it complies with national policy and guidance, the strategic policies of the Borough Council and European regulations. If the Plan satisfies these criteria it can then proceed to a referendum.

## 23 APPENDIX 16: SCHEDULE 1 LETTER AND CONSULTEES CONTACTED

### HOLME-NEXT-THE-SEA PARISH COUNCIL NEIGHBOURHOOD PLAN

c/o 27B Homefields Road, Hunstanton PE36 5HL

Email: [ndp@holmentspc.org](mailto:ndp@holmentspc.org)

website: <http://www.holme-next-the-sea-plan.co.uk>

Date: As post-marked

Dear Consultee,

**Re: Holme-next-the-Sea Neighbourhood Plan Pre-Submission Consultation**

I am writing to you in connection with the Holme-next-the-Sea Neighbourhood Plan Pre-Submission Consultation (Regulation 14) arrangements.

The Pre-Submission Draft Plan sets out the proposed policies incorporating feedback and proposals from extensive consultations during the past three years. It is important that the plan meets the needs and aspirations of the local community, businesses, wildlife organisations and other stakeholders and the Parish Council welcomes your comments and suggestions on the draft document. The Draft Plan represents a chance to have one more say on the content of the plan before it is formally submitted to the Borough Council and proceeds to independent examination and thereafter to referendum.

The Draft Plan will be available for consultation for a period of 6 weeks from 26 June to 07 August 2019. During this period the Plan, together with supporting documents and forms for comment will be available on the Neighbourhood Plan website at <http://www.holme-next-the-sea-plan.co.uk>. Printed versions of the Plan and comments forms will also be available at Hunstanton Library, St Mary's Church in Holme and at a Drop In event and exhibition at the Village Hall in Kirkgate on Saturday 20 July from 2pm to 6.30pm. This event will provide an opportunity to discuss the content of the Neighbourhood Plan with the NDP Team and members of the Parish Council and you are very welcome to come along and join us then.

Comment forms can be downloaded for completion from the Neighbourhood Plan website and emailed to: Christina Jones, NDP Project Co-ordinator at [ndp@holmentspc.org](mailto:ndp@holmentspc.org). Alternatively, hard copy forms can be returned by post to Christina at 27B Homefields Road, Hunstanton PE36 5HL. Further information is available via the NDP website. Please note that all comments must be made by 07 August 2019.

Yours sincerely

*Christina*

Christina Jones

Neighbourhood Plan Project Co-ordinator

**Distribution List Name:** NDP Regulation 14 Schedule 1 Bodies

**Members:**

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Chair; HNTS PC lynn.devereux@regis-solutions.com

Civil Aviation Authority infoservices@caa.co.uk

Community Action Norfolk office@communityactionnorfolk.org.uk

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Courtyard Farm Trust info@courtyardfarm.co.uk

CPRE info@cprenorfolk.org.uk

CTIL EMF.Enquiries@ctil.co.uk

Dersingham Parish Council clerk@dersingham.org.uk

Diocese of Norwich info@dioceseofnorwich.org

Docking Parish Council docking.council@outlook.com

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East Cambridgeshire District Council customerservices@eastcambs.gov.uk

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Fenland District Council info@fenland.gov.uk

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Highways Agency planningee@highwaysengland.co.uk

Historic England eastplanningpolicy@historicengland.org.uk

Holleys Trust holleyscharity@holme-next-the-sea.co.uk

HSE Local PLANS.CEMHD.5@hse.gov.uk

Hunstanton Golf Club secretary@hunstantongolfclub.com

Hunstanton Town Council clerk@hunstantontowncouncil.gov.uk

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Lincolnshire County Council customerservices@lincolnshire.gov.uk

M W McGinn Construction mthmcginn@aol.com

Marine Management Organisation consultations.mmo@marinemanagement.org.uk

MNBL Public.Affairs@three.co.uk

Mr Oscar Jamieson Oscar@DroveOrchards.com

National Grid wecare@nationalgrid.com

National Trust EE.customerenquiries@nationaltrust.org.uk

Natural England consultations@naturalengland.org.uk

Network Rail AssetprotectionAnglia@networkrail.co.uk

New Anglia Lep info@newanglia.co.uk

New Homes England enquiries@homesengland.gov.uk

NHS England england.contactus@nhs.net

Norfolk Chamber of Commerce membership@norfolkchamber.co.uk

Norfolk Coast Partnership Helen.Timson@Norfolk.Gov.UK

Norfolk Ornithologists Association info@noa.org.uk



Norfolk Trails                      Jack.Davidson@Norfolk.Gov.uk

Norfolk Wildlife Trust            info@norfolkwildlifetrust.org.uk

North Norfolk District Council    customerservices@north-norfolk.gov.uk

Old Hunstanton Parish Council   clerk.oh@gmail.com

Richard High                        richardhigh5@btinternet.com

Ringstead Parish Council        greatringsteadpc@outlook.com

Riverside Caravan Park         MoseleyDK@gmail.com

RSPB                                 philip.pearson@rspb.org.uk

Sandringham Parish Council      bencolson1@aol.com

Sedgford Parish Council        jands@wychwood7.co.uk

Sheringham Shoal Offshore Windfarmgm\_SciraInfo@equinor.com

Sir Henry Bellingham MP        bellinghamh@parliament.uk

Snettisham Parish Council       snettishparish@btconnect.com

South Holland District Council   info@sholland.gov.uk

Sport England                      funding@sportengland.org

St Mary's Church, Holme        cwhnts@saxonshorebenefice.co.uk

Stephen Faulkner, Norfolk County Council    [stephen.faulkner@norfolk.gov.uk](mailto:stephen.faulkner@norfolk.gov.uk)

Stephen Lucas (AR&V Investments)    stephenwlucas@aol.com

Suffolk County Council         customer.service@suffolk.gov.uk

The coal authority                thecoalauthority@coal.gov.uk

The Office of Rail and Road       [dutytooperate@orr.gsi.gov.uk](mailto:dutytooperate@orr.gsi.gov.uk)

Thornham Deli                      info@thornhamdeli.co.uk

Thornham Parish Council        thornhampc@gmail.co.uk

Three                                william.comery@ericsson.com

UK Power Networks                peter.rye@ukpowernetworks.co.uk

UK Power Networks 1            enquiries@ukpowernetworks.co.uk

Wash and North Norfolk Marine Partnershipinfo@wnnmp.co.uk

Water Management Alliance      info@wlma.org.uk

West Norfolk CCG                      [contact.wnccg@nhs.net](mailto:contact.wnccg@nhs.net)

West Norfolk Disability Forum   [rebecca.parker@west-norfolk.gov.uk](mailto:rebecca.parker@west-norfolk.gov.uk)

**Letters were posted to the following for whom no email addresses were available:**

AR&V Investments Ltd  
68 Grafton Way,  
London, W1T 5DS

Holme-next-the-Sea  
Hunstanton PE36 6LH

Claudia Starr Developments  
Vine Cottage,  
49 Main Road,  
Holme-Next-The-Sea  
Norfolk PE36 6LA

Newholme Nurseries  
Thornham Road  
Holme-next-Sea  
Hunstanton  
Norfolk  
PE36 6LR

The Management  
The White Horse caravan Park  
Kirkgate,  
Holme-next-the-Sea  
Hunstanton PE36 6LH

The Management  
Sunnymead Caravan Park  
2 Kirkgate,  
Holme-next-the-Sea,  
Hunstanton PE36 6LH

The Management  
The White Horse Public House  
Kirkgate,

## 24 APPENDIX 17: REGULATION 14 CONSULTATION RESPONSE FORM

COMMENT FORM				
HOLME-NEXT-THE-SEA NEIGHBOURHOOD PLAN PRE-SUBMISSION CONSULTATION				
<i>(Complete and email to <a href="mailto:ndp@holmentspc.org">ndp@holmentspc.org</a> or print and post to Christina Jones, NDP Project Co-ordinator at 27B Homefields Road, Hunstanton PE36 5HL)</i>				
NAME				
ORGANISATION (if applicable)				
TYPE OF RESPONDENT (please indicate below)				
Resident	2 <sup>nd</sup> Home Owner	Business	Statutory/Schedule 1 Consultee	Other
NEIGHBOURHOOD PLAN		GENERAL COMMENTS		
Enter comments on the complete plan here and/or enter comments on individual policies below				

POLICY	AGREE	DISAGREE	COMMENTS
POLICY HNTS1 Principle of Sustainable Development			
POLICY HNTS 2 Holme Village Zone			
POLICY HNTS 3 Protected Sites			
POLICY HNTS 4 Adaptation & Resilience Zone			
POLICY HNTS 5 Countryside Zone			
POLICY HNTS 6 Drove Orchards			
POLICY HNTS 7 Natural Capital & Ecosystem Services			
POLICY HNTS 8 Sustainable Travel & Tourism			

<b>POLICY HNTS 9 Touring &amp; Permanent Holiday Accommodation</b>			
<b>POLICY HNTS 10 Overall Form &amp; Pattern of Settlement</b>			
<b>POLICY HNTS 11 Street Scene, Character &amp; Residential Environment</b>			
<b>POLICY HNTS 12 Conservation Area</b>			
<b>POLICY HNTS 13 New Homes</b>			
<b>POLICY HNTS 14 Replacement Dwellings</b>			
<b>POLICY HNTS 15 Extensions, Annexes &amp; Outbuildings</b>			
<b>POLICY HNTS 16 Principal Residences</b>			

<b>POLICY HNTS 17 Local Green Space</b>			
<b>POLICY HNTS 18 Heritage Assets</b>			
<b>POLICY HNTS 19 AONB Landscape Quality</b>			
<b>POLICY HNTS 20 Advertising &amp; Signage</b>			
<b>POLICY HNTS 21 Biodiversity</b>			
<b>POLICY HNTS 22 Pollution</b>			
<b>POLICY HNTS 23 Water Resource Management</b>			
<b>POLICY HNTS 24 Traffic &amp; Car Parking</b>			

25 APPENDIX 18: FLYER ADVERTISING REGULATION 14 CONSULTATION  
DROP IN EVENT

HOLME-NEXT-THE-SEA PARISH COUNCIL



**NEIGHBOURHOOD PLAN**  
**PUBLIC CONSULTATION**



**SATURDAY 20th JULY 2019**

**Drop in Anytime between 2 pm and 6.30 pm in the Village Hall**

- The Draft Plan will be displayed with the proposed policies and supporting information.
- Take the opportunity to ask questions, discuss any issues and make comments.
- Refreshments available – tea, coffee and cakes – with all profits for Astro Brain Tumour Fund.

**The Neighbourhood Plan will guide development in the Parish up to 2036  
so it has to work for our community.**

**All comments will be considered as part of the Consultation process  
before submission of the Draft Plan!**

See the website for more information <http://www.holme-next-the-sea-plan.co.uk>

*Any queries, please contact the Project Co-ordinator, Christina Jones*

*Tel: 01485 535065 or Email: [ndp@holmentspc.org](mailto:ndp@holmentspc.org)*

## 26 APPENDIX 19: REGULATION 14: FEEDBACK AND CONSULTATION RESPONSES TABLE

### HOLME-NEXT-THE-SEA NEIGHBOURHOOD PLAN PRE-SUBMISSION CONSULTATION RESPONSES

*(Unless otherwise stated all comments whether by email or Comment Form have been acknowledged with the statement "all comments will be considered as part of the Consultation process")*

CONSULTEE	COMMENT FORM NO:	EMAIL NO:	COMMENTS	RESPONSE	ACTION TAKEN
ABBEY GROUP		23	<ul style="list-style-type: none"> <li>▫ No list of strategic policies</li> <li>▫ 2036 is inappropriate time period</li> <li>▫ NDP not consistent with CS10 &amp; NPPF 83</li> <li>▫ HNTS 9 Negatively worded</li> <li>▫ Request for hearing</li> <li>▫ Fails to meet Basic Conditions</li> </ul>	<p>Not required at Reg 14</p> <p>Close liaison with BC will prevent conflict and NDP can be updated anyway</p> <p>Provision for economic development proportionate to SVAH status especially at Drove but in many other policies (HNTS 6, HNTS 7, HNTS 8, HNTS 17, HNTS 18)</p> <p>Consistent with SADMP DM11 and DM 2,DM3</p> <p>Matter for Examiner</p> <p>General conformity demonstrated in Basic Conditions Statement</p>	<p>Included in basic conditions statement</p> <p>Strengthen policy references to Home Working Support</p>
ANGLIAN WATER		14	<ul style="list-style-type: none"> <li>▫ Suggested clarification on management of non-potable water resources in HNTS 4.</li> <li>▫ HNTS 23 Support need for applicants to demonstrate sufficient capacity in the public</li> </ul>	<p>HNTS 4: Clarify purpose of schemes for non-potable water resources.</p> <p>HNTS 23: Support acknowledged.</p>	<p>HNTS 4 : Additional words included after 'small lakes and reservoirs' <i>for the purposes of agriculture and/or improvement of biodiversity.</i></p> <p>HNTS 23: No action taken.</p>

CONSULTEE	COMMENT FORM NO:	EMAIL NO:	COMMENTS	RESPONSE	ACTION TAKEN
			<p>sewerage system.</p> <ul style="list-style-type: none"> <li>▫ Request for amendment to HNTS 23 to make it clear Sustainable Drainage Systems (SuDs) are the preferred method of surface water management and reference made to storm water harvesting. Proposed amendment suggested.</li> </ul>	<p>HNTS 23: Two amendments agreed.</p>	<p>HNTS 23: Policy wording modified <i>(i) the provision of sustainable drainage systems (SuDs) wherever feasible and clear arrangements for the management of sustainable drainage.</i> <i>(ii) use of permeable surfaces, rainwater and storm water harvesting and storage.</i></p>
ANONYMOUS (Resident)	31		<p>General comments - totally against more development and providing more facilities to encourage more visitors, most policies appear reasonable but will encourage the village to change.</p> <ul style="list-style-type: none"> <li>▫ Support 11 policies with no indication against 10 others.</li> <li>▫ HNTS 4/8: More footpaths and cycle ways would encourage more visitors.</li> <li>▫ HNTS 9: No replacement of existing holiday accommodation.</li> </ul>	<p>HNTS 4/8: The aim of footpaths is to dissipate visitors and disperse pressure from the protected sites and encourage more sustainable, low impact tourism.</p> <p>HNTS 9: The NDP aims to protect existing businesses. No replacement would be too restrictive and harmful to the local economy.</p>	<p>HNTS 4/8: Visitor numbers are rising due to external factors and adaptation to climate change is required therefore no policy change.</p> <p>HNTS 9: Policy wording modified. ....on a one for one basis, <i>on the existing site</i>, subject to other policies in the NDP and Local Plan.....</p>
AR & V INVESTMENTS LIMITED (Submitted by LANPRO)		20	<ul style="list-style-type: none"> <li>▫ NDP fails to capitalise on opportunity to allocate sufficient sites for development</li> </ul>	<p>Extensive consultation has resulted in variety of sites being evaluated and compared. Level of development consistent with SVAH status &amp; requirements of LDF</p>	

CONSULTEE	COMMENT FORM NO:	EMAIL NO:	COMMENTS	RESPONSE	ACTION TAKEN
			<ul style="list-style-type: none"> <li>▫ Village problems include lack of employment opportunities, lack of local spend &amp; services; has economically inactive/ageing population</li> <li>▫ NDP has not engaged with client and allocated client's sites</li> <li>▫ Development envelope does not reflect actual village boundary or extent of development. Should include client's site, Inglenook &amp; Poplars</li> <li>▫ Generally unhappy with scale and size of homes proposed</li> <li>▫ HNTS 9 prevents development of touring and permanent holiday accommodation</li> <li>▫ NDP is not consistent with NPPF35 and is therefore unsound</li> <li>▫ AR&amp;V wish to attend forthcoming EIP to demonstrate NDP is unsound</li> </ul>	<p>Not supported by evidence base</p> <p>Sites not proposed in response to consultation. Arrangements for Lanpro/AR&amp;V to engage with PC cancelled on 2 occasions.</p> <p>Development envelope agreed with BC. Not appropriate for large gaps to be left for development in SVAH. Client's site subject of BC enforcement appeal against unlawful camping &amp; caravan use. Inclusion would run counter to LDF.</p> <p>NDP in keeping with SVAH status and LDF requirements.</p> <p>Housing comments predicated on misunderstanding of evidence – residents <u>are not</u> living in mobile and temporary accommodation.</p> <p>Consistent with DM11, DM2 and DM3</p> <p>Basic Conditions statement demonstrates NDP satisfies NPPF requirements.</p> <p>This is a matter for the examiner</p>	



CONSULTEE	COMMENT FORM NO:	EMAIL NO:	COMMENTS	RESPONSE	ACTION TAKEN
ARNOLD Jackie (Resident)	26		<ul style="list-style-type: none"> <li>▫ Supports all policies</li> </ul>	Support acknowledged.	
BELLINGHAM Henry MP			Acknowledgement by Constituency Secretary (Eileen Stephens) who will pass it to Henry Bellingham.		
BELLS & WHISTLES @ Drove Orchard			<p>Telephone call from owner on receipt of Information Leaflet:</p> <ul style="list-style-type: none"> <li>▫ Considered the red lettering very aggressive.</li> <li>▫ Would have liked a face to face discussion when the leaflet was delivered.</li> <li>▫ Concerned about development in the area (lives in Burnham Deepdale) but considers tourism of prime importance.</li> </ul>	Discussion of NDP process, with reference to previous public consultations which had been widely publicised, giving opportunities for face to face discussions with the NDP team. Suggested her concerns and comments be submitted from the website or, if time was at a premium (this was raised as an issue), perhaps an email outlining points that had been raised during the telephone call could be submitted.	No further action required but respondent did not pursue.
BOROUGH COUNCIL OF KING'S LYNN & WEST NORFOLK		24	<ul style="list-style-type: none"> <li>▫ Congratulations on Plan preparation.</li> <li>▫ Happy to meet to discuss any issues arising from the Pre-submission Consultation.</li> <li>▫ Specific queries raised on a number of listed policies and favourable comments on others.</li> </ul>	<p>Support acknowledged.</p> <p>Review meeting arranged, appropriate responses agreed and implemented.</p>	See separate form for details of response & actions taken
BOWMAN Robert and Linda (Residents)	37		<p>General comments - nothing but praise for NP with extensive work, data sourcing and key maps, policies that are logical and straightforward to control the inevitable development of the village in the future.</p> <ul style="list-style-type: none"> <li>▫ Support all policies with comments.</li> <li>▫ HNTS 6: Support limited development at Drove providing access to A149 is improved.</li> <li>▫ HNTS 13: New dwellings must be no higher than 2 storeys including garages and outbuildings.</li> </ul>	<p>Support acknowledged.</p> <p>HNTS 6: A149 access is a Highways matter. HNTS 13: Dealt with in Street Scene policy</p>	<p>HNTS 6: No policy change.</p> <p>HNTS 13 / 11: No policy changes.</p>

CONSULTEE	COMMENT FORM NO:	EMAIL NO:	COMMENTS	RESPONSE	ACTION TAKEN
			<ul style="list-style-type: none"> <li>▫ HNTS 20: Illuminated signs should not be allowed.</li> </ul>	(HNTS 11) and Site Allocation policy (HNTS 13B) HNTS 20: Already covered by policy.	HNTS 20: No policy change.
BURTON Mary (Resident)	19		<p>General comments - extremely impressed with presentation and content of consultation, hope it goes some way to controlling future development.</p> <ul style="list-style-type: none"> <li>▫ Supports all policies with HNTS 14 and HNTS 16 being particularly important.</li> </ul>	<p>Support acknowledged.</p> <p>HNTS 16: Concerns about size of houses and empty homes acknowledges in Principle Residences (HNTS16) and Replacement Dwellings (HNTS 14)</p>	
BURTON Robert (Resident)	18		<p>General comments - very thorough and well presented, important to move forward without spoiling what we have for generations to come.</p> <ul style="list-style-type: none"> <li>▫ Supports all policies with positive comments against some.</li> <li>▫ HNTS 14 and HNTS 16 very important.</li> <li>▫ HNTS 17, HNTS 19 and HNTS 21 also important.</li> </ul>	Support acknowledged.	
CIVIL AVIATION AUTHORITY		2	Automated acknowledgement from a retired mailbox with links to six other sites none of which appear relevant.		
CLAUDIA STARR DEVELOPMENTS	3		<ul style="list-style-type: none"> <li>▫ HNTS 1 (Principle of Sustainable Development) should contain more support for home working (para 2.4.9)</li> <li>▫ Objections to HNTS 2 (Holme Village Zone), Precludes principal of development on rear Paddock Land. Suggests policy modified to allow development outside Village Zone. Principles applied to Eastgate Barn site should be followed.</li> </ul>	<p>HNTS 1: Doesn't address this specific issue which is dealt with under HNTS 15. Planning permission not always required for home working.</p> <p>HNTS 2: Holme is a Smaller Village and Hamlet and as such the BC is not proposing any allocations. Development on the rear paddock land would not respect the form of the settlement and would not constitute frontage infill (as</p>	<p>HNTS 1: No action</p> <p>HNTS15 Supporting explanation expanded to emphasise support for Home Working</p> <p>HNTS 2:</p>

CONSULTEE	COMMENT FORM NO:	EMAIL NO:	COMMENTS	RESPONSE	ACTION TAKEN
			<p>▫ HNTS 8 (Sustainable Travel &amp; Tourism)</p> <p>Should be no restrictions on new development at Drove Orchards. Holme PC should not have any influence wrt what influence a prospective business has on other retail developments in the area. Job opportunities paramount to local area. And attracting young households to live/work in Parish.</p> <p>Policies should be supporting infrastructure and local business network.</p> <p>▫ HNTS 13 (New Homes)</p> <p>Size limit on new houses should only be applied to housing sites promoted in the Plan.</p>	<p>required by SADSMP DM3)</p> <p>The NDP has looked at all proposed sites and has selected a preferred allocation based on HELAA &amp; consultation feedback in accordance with community preferences. The allocation is over and above LDF requirements.</p> <p>HNTS 8: Treatment of Drove is consistent with National Policy eg NPPF 15.</p> <p>Provision for employment opportunities including Drove is more than proportionate with Holme's SVAH status.</p> <p>Housing Policy package gives young families opportunity to live in the village and hence work in the area.</p> <p>Value of business and community networking with neighbouring parishes/Hunstanton recognised Business networking not relevant to NDP policies but could be progressed through PC/BC if it doesn't replicate Chamber of Commerce &amp; Hunstanton Chamber of Trade activities</p> <p>HNTS13</p> <p>Size limits reflect strong community preference and</p>	<p>No policy changes required.</p> <p>Holme has access to Fibre Broadband. Emphasis added for fibre ready communications provision in New Dwellings Policies (see below).</p> <p>HNTS 13</p> <p>Wording of policies HNTS13 &amp; 14 modified emphasising need for fibre ready communications.</p>



CONSULTEE	COMMENT FORM NO:	EMAIL NO:	COMMENTS	RESPONSE	ACTION TAKEN
			<ul style="list-style-type: none"> <li>▫ HNTS 8: A cycle track to Thornham and Old Hunstanton would be brilliant as A149 is so dangerous.</li> <li>▫ Dawn to dusk lights on some new properties spoil dark skies.</li> </ul>	<p>HNTS 8: Already supports this.</p> <p>Dealt with by HNTS 19 (AONB Landscape)</p>	No action required
CROWE John (2nd Home Owner)	25		<ul style="list-style-type: none"> <li>▫ Supports all policies.</li> </ul>	Support acknowledged.	
CROWE Olwen (2nd Home Owner)	29		<ul style="list-style-type: none"> <li>▫ Supports all policies.</li> </ul>	Support acknowledged.	
CROWN Martin (Resident)	15		<ul style="list-style-type: none"> <li>▫ Supports all policies with positive comments.</li> <li>▫ HNTS14: Shame it has to be as high as 40%.</li> <li>▫ HNTS 23: Query on spare capacity of main sewer as considerable development since installation.</li> </ul>	<p>Support acknowledged.</p> <p>HNTS 14: 40% based on feedback from earlier consultants and PDR. HNTS 23: Already dealt with.</p>	<p>HNTS 14: No action required.</p> <p>HNTS 23: No action required.</p>
CROWN Sally (Resident)	12		<p>General comments - thank you for all your hard work.</p> <ul style="list-style-type: none"> <li>▫ Supports all policies.</li> <li>▫ HNTS 2: Assume this means 'raised' housing to withstand flooding.</li> <li>▫ HNTS 7: (ix) not sure how a policy will do this.</li> <li>▫ HNTS 14: Can the principle home policy be enforced on subsequent sales?</li> </ul>	<p>Support acknowledged.</p> <p>HNTS 2: Noted. HNTS 7(ix): Noted HNTS 14: A condition will be approved plus a legal agreement that will run in perpetuity with the property.</p>	<p>HNTS 2: No action required. HNTS 7(ix): No action required. HNTS 14: No action required.</p>
CRUSO & WILKIN (On behalf of Mr. G. Renault)		26	<ul style="list-style-type: none"> <li>▫ Objection on behalf of Mr G Renault (landowner of proposed NDP housing allocation) but support allocation</li> <li>▫ Strong objection to Principal Homes Policy which will damage housing market will establish precedent and is unjustified on</li> </ul>	<p>Not consistent with Mr Renault's consultation response. Support for allocation noted.</p> <p>Justification similar to St Ives though Holme has more extreme problem(s). Precedent already</p>	

CONSULTEE	COMMENT FORM NO:	EMAIL NO:	COMMENTS	RESPONSE	ACTION TAKEN
			<p>socio-economic grounds</p> <ul style="list-style-type: none"> <li>▫ See no need to protect resident community</li> <li>▫ Suggest policy restricting size of replacement dwellings</li> <li>▫ No evidence to justify HNTS 16 on basis of need</li> <li>▫ Traffic generated by proposed allocation would not lead to unacceptable highway impacts</li> <li>▫ Request for oral hearing</li> <li>▫ NDP does not meet with Basic Conditions</li> <li>▫ Allocation of Eastgate Barn is not viable as Principal Homes.</li> </ul>	<p>established in W. Norfolk and beyond. No evidence presented by C&amp;W for damage to housing market or economy. Comment not consistent with local experience from similar schemes</p> <p>Inconsistent with NPPF and NDP objectives</p> <p>Already exists in plan (HNTS 16)</p> <p>Not consistent with evidence reports</p> <p>Noted</p> <p>This is a matter for the Examiner</p> <p>Non conformity summary is not supported by evidence. See Basic Conditions Statement</p> <p>Viability appraisal presented is not justified on basis of evidence or experience. No justification or evidence for depressing Principal Homes market value by 40%.</p> <p>Cost profile for 5 x Principal Homes alternative has not been adjusted to reflect 40% reduction in market value. Costs appear too high in both options.</p>	

CONSULTEE	COMMENT FORM NO:	EMAIL NO:	COMMENTS	RESPONSE	ACTION TAKEN
DROVE ORCHARDS		6	See entry under Oscar Jamieson. (Drove owner)		
EASTON Margaret (Ex Resident)	8		General comments - Plan covers everything that needs to be protected for future generations, thanks to those working on it. <ul style="list-style-type: none"> <li>▫ Supports all policies - positive comments against almost every one.</li> <li>▫ HNTS 7, HNTS 11, HNTS 12, HNTS 15, HNTS 16, HNTS 17, HNTS 19 and HNTS 23 particularly important.</li> </ul>	Strong support acknowledged.	
ENVIRONMENT AGENCY			Gary Watson away until 16th July but will respond after that date.		
ESSEX & SUFFOLK WATER			Automated acknowledgement and will respond later if necessary. Further email confirming HNTS not its area and that Anglian Water is the relevant authority.		
FENLAND DISTRICT COUNCIL			Automated acknowledgement and will respond later if necessary.		
FLATT Joyce (Other)	32		Supports all policies particularly 7 and 19 with positive comments against some.	Support acknowledged.	
FLATT Roger (Other - from Lincoln)	33		Supports all policies except HNTS 9 and 'No Comment' against HNTS 3.	Support acknowledged. HNTS 9: Necessary to be consistent with LDF policy.	HNTS 9: No action required
GEORGE Diana (2nd Home Owner)	36		General comments - a lot of work has gone into document and it deserves to be respected. <ul style="list-style-type: none"> <li>▫ Supports all policies particularly HNTS 8, HNTS 12, and HNTS 14 with supporting comments against some.</li> </ul>	Support acknowledged.	
GEORGE Ted (2nd Home Owner)	35		General comments - impressive and well researched document that deserves to be accepted and respected. <ul style="list-style-type: none"> <li>▫ Supports almost all policies with supporting comments against many.</li> <li>▫ No indication against HNTS 6 or HNTS 7.</li> </ul>	Strong support especially for biodiversity and pollution policy acknowledged.	
HAM Peter George (Resident)	17		General comments - a lot of hard work has gone into NP, supported in general and thanks to those involved.	Support acknowledged.	

CONSULTEE	COMMENT FORM NO:	EMAIL NO:	COMMENTS	RESPONSE	ACTION TAKEN
			<ul style="list-style-type: none"> <li>▫ Supports all policies except HNTS 8 and HNTS 20.</li> <li>▫ HNTS 8: See no need to encourage more tourism.</li>   <li>▫ HNTS 13: Best location but will new homes be holiday lets or second homes?</li>   <li>▫ HNTS 20: No need for any more signs.</li> </ul>	<p>HNTS 8: Tourist pressure will continue to grow due to external influences and this policy aims to minimize its negative impact.</p> <p>HNTS 13: Policy HNTS 16 (Principal Residences) addresses this.</p> <p>HNTS 20: This policy addresses impacts of advertising.</p>	<p>HNTS 8: No action required.</p> <p>HNTS 13: No action required.</p> <p>HNTS 20: No action required.</p>
HAM Tina (Resident)	34		<p>General comments - lived in Holme 20 years and village now very different, too many 2nd homes, concerns about future development.</p> <p>Strongly supports policies HNTS 9 and HNTS 11 particularly.</p> <ul style="list-style-type: none"> <li>▫ Supports most policies but in practice not implemented.</li> <li>▫ No more camp/caravan sites.</li>   <li>▫ No building on Park Piece.</li>   <li>▫ Objects to Infill Policy (HNTS 10)</li> </ul>	<p>General support acknowledged.</p> <p>Camp/caravan site issue addressed through HNTS 9.</p> <p>Park Piece issue addressed through HNTS 16.</p> <p>The specific objection to the Infill Policy (HNTS 10) is understood but HNTS 11 should deal with issue. Backland development is controlled through Policy HNTS 10.</p>	<p>HNTS 9 and 16: No further action required.</p> <p>HNTS 10: No action required.</p>



CONSULTEE	COMMENT FORM NO:	EMAIL NO:	COMMENTS	RESPONSE	ACTION TAKEN
HARRIS Geoffrey J (Resident)		7	Negative response that the NDP will have little effect and critical of BC's approach to the area. No constructive suggestions or comments.	Noted but the BC has been extremely supportive throughout the process.	No action required.
HIGHWAYS ENGLAND		18	Reference to impact on Strategic Road Network but ultimately no comment to make on the Plan.	Support for HNTS 8 acknowledged.	
INTERNAL DRAINAGE BOARD (WATER MANAGEMENT ALLIANCE)		3	Automated acknowledgement with helpful references to various websites including Byelaws and Consents that may be applicable.	In supporting statement for HNTS 23 include reference to Bye Laws of IDB. Regulatory measures are not referenced in plan policies (NPPF 183)	HNTS 23: Attention drawn to IDB Bye Laws in supporting text.
IRVINE Robin (2nd Home Owner)	22	10	<p>Email:</p> <ul style="list-style-type: none"> <li>▫ Suggestion for inclusion of provision for Swifts in new builds and significant extensions.</li> <li>▫ Suggestion for increased emphasis on historical heritage with links to websites and paper on Seahenge 2.</li> </ul> <p>Form:</p> <p>General comments - superb piece of work and a fine basis for the village's future.</p> <ul style="list-style-type: none"> <li>▫ Supports all policies with positive comments and a variety of suggestions.</li> <li>▫ HNTS 2: The 'Open Core' has no designation on the map and merits unambiguous protection by being specifically indicated.</li> </ul>	<p>Swift boxes: Not enforceable but general provisions with regard to biodiversity are included in HNTS 21.</p> <p>Response emailed</p> <p>Support acknowledged.</p> <p>HNTS 2: Currently included in 4.2.4.</p>	<p>Respondent provided with link to Heritage Report (now happy).</p> <p>HNTS 2: Policy wording modified to reinforce status of central core of village.</p>

CONSULTEE	COMMENT FORM NO:	EMAIL NO:	COMMENTS	RESPONSE	ACTION TAKEN
			<ul style="list-style-type: none"> <li>▫ HNTS 6: Traffic in/out Drove Orchards needs better management.</li> <li>▫ HNTS 8: Footpath access to Drove Orchards and Old Hunstanton would be excellent.</li> <li>▫ HNTS 9: If climate change/flooding makes caravans unusable they should not be relocated outside current sites.</li> <li>▫ Dark skies needs enforcement with developers.</li> </ul>	<p>HNTS 6: A149 is a Highways matter. NDP attempts to deal with this general problem in HNTS 24.</p> <p>HNTS 8: Already covers this.</p> <p>HNTS 9: Policy should be modified to make clear that replacements should be on site. HNTS 19: Comment about dark skies noted.</p>	<p>HNTS 6: No further action required.</p> <p>HNTS 8: No further action required.</p> <p>HNTS 9: Policy wording modified to reflect this comment</p> <p>HNTS 19: No change required to policy wording.</p>
IRVINE Sandi (2nd Home Owner)	21		<p>General comments - fantastic work, many thanks, improved WiFi would help with cottage industries, village ponds need to be protected.</p> <ul style="list-style-type: none"> <li>▫ Supports all policies with positive comments and some suggestions.</li> <li>▫ HNTS 4: Cannot replace saltmarsh.</li> <li>▫ HNTS 7: Nest boxes for swifts, martins and swallows.</li> <li>▫ HNTS 8: Footpath linking the end of Aslack Way to Easgate would be helpful.</li> </ul>	<p>Support acknowledged.</p> <p>WiFi and Home Working will be given more prominence in the NDP.</p> <p>Ponds are dealt with under HNTS 21 (Biodiversity)</p> <p>HNTS 4: Acknowledged in policy</p> <p>HNTS 7: Not enforceable but biodiversity dealt with in HNTS 21.</p> <p>HNTS 8: Would be supported by NDP</p>	<p>Policy supporting text in HNTS 15 strengthened to reflect importance of home working. Policies 13 &amp; 14 changed to reflect importance of fibre broadband.</p> <p>No further action required</p> <p>HNTS 7: No further action required.</p> <p>HNTS 8: No further action required.</p>

CONSULTEE	COMMENT FORM NO:	EMAIL NO:	COMMENTS	RESPONSE	ACTION TAKEN
			<ul style="list-style-type: none"> <li>▫ HNTS 14: Definition of size for 'outbuildings' should be specified.</li> <li>▫ HNTS 22/24: Provision of charging point for electric cars should be made</li> </ul>	<p>policy if the land became available.</p> <p>HNTS 14: Covered by PDR</p> <p>Add provision for charging point in HNTS 22 (Pollution)</p>	<p>HNTS 14: No further action required.</p> <p>HNTS 22: Policy purpose wording modified</p>
JAMIESON Oscar (Resident and on behalf of DROVE ORCHARDS)		6	Refers to Clause 6.1.3 (?) of NDP and recommends support for 'sensitive development of real estate to facilitate economic activity and job creation' as well as preserving 'suitable housing stock for those starting out in life'.	Paragraph 6.1.3 not located. Policies HNTS 6 (Drove); HNTS 7 (Natural Capital and Ecosystem Services), HNTS 14 (Replacement Dwellings) and HNTS 16 (Principal Homes) address these issues. The new dwellings and housing allocation policies aim to provide new homes " <i>suitable for younger families</i> ".	<p>Policy HNTS 15 modified to emphasise homeworking.</p> <p>HNTS 13 &amp; 14 modified to promote access to full fibre broadband.</p> <p>No change</p>
JOLLIFFE Robin (Broadwater Road Resident)		13	<ul style="list-style-type: none"> <li>▫ Congratulations on an outstanding achievement.</li> <li>▫ Hopes to help implementing its aims in the future.</li> </ul>	Support acknowledged.	
JONES Douglas (Other)	9		Supports all policies - no comments.	Support acknowledged.	
JONES Maria (Resident)	24		<p>General comments - welcomes Plan, inappropriate development over recent years, protection needed for village of Holme.</p> <ul style="list-style-type: none"> <li>▫ Supports all policies with positive comments on some.</li> <li>▫ HNTS 10: Fields in the centre of the village are under threat but are historic medieval layout unique to Norfolk.</li> </ul>	<p>Support acknowledged</p> <p>HNTS 10: acknowledged – to be dealt with under HNTS 2</p>	<p>HNTS 2 changed: Policy wording modified to reinforce status of central core of village.</p>
JONES Nicholas (Resident)	23		General comments - agrees with all points/policies in NP and support its full application at earliest	Support acknowledged.	

CONSULTEE	COMMENT FORM NO:	EMAIL NO:	COMMENTS	RESPONSE	ACTION TAKEN
			<p>opportunity.</p> <ul style="list-style-type: none"> <li>▫ Supports all policies with positive comments against some.</li> <li>▫ HNTS 10: The fields/large gardens in the middles of the village should be sacrosanct and remain untouched.</li> </ul>	HNTS 10: acknowledged – to be dealt with under HNTS 2	HNTS 2 changed: Policy wording modified to reinforce status of central core of village.
JONES Robert (Resident)	14		<p>General comments - very impressive, so much excellent work has gone into it.</p> <ul style="list-style-type: none"> <li>▫ Agrees with all policies with positive comments against HNTS 1, HNTS , HNTS 8 and HNTS 9.</li> <li>▫ HNTS 8: A cycle route to Old Hunstanton has been discussed for some time - cyclists and pedestrians are at risk on A149.</li> </ul>	<p>Support acknowledged.</p> <p>HNTS 8: Policy supports provision if land can be made available.</p>	HNTS 8: No further action required
JONES Stephanie (Resident)	13		<p>General comments - a lot of hard work has gone into Plan and important character and beauty of village and area is maintained.</p> <ul style="list-style-type: none"> <li>▫ Supports all policies with positive comments against some.</li> <li>▫ HNTS 8: Need a footpath to bus shelter from Beach Road and a footpath to Old Hunstanton would be of benefit.</li> <li>▫ HNTS 12: Conservation Area needs to be extended to include Beach road and Broadwater Road.</li> <li>▫ HNTS 17: Electricity supply to Park Piece would help to make it useable for village events.</li> <li>▫ HNTS 22: Builders do not make good damage to verges.</li> </ul>	<p>Support acknowledged.</p> <p>HNTS 8: See above.</p> <p>HNTS 12: Policy gives weight to (unadopted) Conservation Area Statement but Conservation Area Boundary is not an NDP matter.</p> <p>HNTS 17: Policy would not prevent this.</p> <p>HNTS 22: Policy seeks to address this.</p>	<p>HNTS 8: No further action required.</p> <p>HNTS 12: No further action required.</p> <p>HNTS 17: No further action required.</p> <p>HNTS 22: Policy wording strengthened following discussions with BC to require Construction Management Plans where appropriate</p>
McGINN Anthony		1	Request for a brief description of what NDP entails	Responded with an overview of	No further action required.

CONSULTEE	COMMENT FORM NO:	EMAIL NO:	COMMENTS	RESPONSE	ACTION TAKEN
(A.McGinn Groundworks and Equestrian Construction Ltd.)			and location of more information.	NDP and process. Recommended reference to the website and attendance at Open Day.	Respondent did not pursue.
MARINE MANAGEMENT ORGANISATION (MMO)		21	<ul style="list-style-type: none"> <li>▫ General marine planning information and legal responsibilities.</li> <li>▫ List of policies from the East Inshore and East Offshore Marine Plans that are most relevant suggested as follows: EC1, SOC1-3, BIO1, MPA1, CC1, TR1, TR3</li> <li>▫ Recommendations relating to Part A Section 1.1 and Part B Policies HNTS 4 and 7 with additional wording regarding East Marine Plans.</li> </ul>	<p>EI&amp;EOMP reviewed. Selected policies to be referenced in relevant NDP policy evidence and framework.</p> <p>Recommended change to Part A Section 1.1 agreed. Policies referenced but no policy changes required.</p>	<p>Following references included: HNTS 4: - ECO1 &amp; CC1 HNTS 7: - BIO1 &amp; CC1 HNTS 12: - SOC 2 HNTS 19: - SOC 3 HNTS 21: - BIO 1</p> <p>PART A SECTION 1.1: Reference to East Inshore and East Offshore Marine Plan included.</p>
MARTIN Mrs. K. (Resident)	7		<p>General comments - village being spoilt by development, do not agree with caravan site off Main Road, traffic issues.</p> <ul style="list-style-type: none"> <li>▫ HNTS 9: Disagree - more than enough holiday homes in this small village.</li> <li>▫ HNTS 11: Told to remove plants from outside boundary walls.</li> <li>▫ HNTS 13: Disagree - far too many very large houses that do not blend in with rest of village.</li> </ul>	<p>HNTS 9: Noted – may have misunderstood policy intention. HNTS 11: Noted. HNTS 13: Addressed through policy.</p>	<p>HNTS 9: No action required. HNTS 11: No action required. HNTS 13: No action required.</p>
MILNER Keith (Resident of large village near Aylesbury, Buckinghamshire)		11	<ul style="list-style-type: none"> <li>▫ Congratulations on Draft Plan. His village NDP, although passed at Referendum in 2015, has had little effect as the Local Planning Authority does not have an acceptable Local Plan. (It seems there is no 5 year land supply.)</li> </ul>	Noted. BC has a 5 year land supply and a current Local Plan.	Chair of PC to respond to Mr Milner with thanks
NATIONAL GRID		9	<ul style="list-style-type: none"> <li>▫ General comments and map of National Grid</li> </ul>	Noted.	No action required.

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			<p>network in UK.</p> <ul style="list-style-type: none"> <li>▫ Confirmation no electricity or gas transmission apparatus in HNTS NDP area.</li> </ul>		
NATIONAL TRUST			Automated acknowledgement and relevant team will respond.	No follow up response.	
NATURAL ENGLAND		25	<p>Automated acknowledgement and will respond within the six week period.</p> <ul style="list-style-type: none"> <li>▫ Supportive of NP and welcome the commitment to enhance the natural environment, protect designated sites and landscapes and facilitate coastal adaptation in light of climate change.</li> <li>▫ No specific or detailed comments to make on Plan policy.</li> </ul>	Very supportive of NDP.	No action required
<p>NORFOLK COUNTY COUNCIL <i>Infrastructure Delivery</i></p> <p><i>Transport</i></p> <p><i>Lead Local Flood Authority</i></p>		8	<ul style="list-style-type: none"> <li>▫ Suggests supporting text for Infrastructure Delivery relating to CIL/S106 and Norfolk Fire and Rescue Service recommendation for sprinklers in new properties.</li> <li>▫ Objects to allocation of land at Eastgate Barn as road is narrow, has no footpath, the junction with A149 is substandard and the settlement has no primary education provision.</li> <li>▫ There is no specific mention of surface water flood risk within the NDP</li> </ul>	<p>Building Regulations not Planning Policy. CIL is dealt with by the BC.</p> <p>Objection is unrealistic given the rural location. There is no school in the village and by implication this would rule out any housing development in Holme The potential traffic impact would be no more than the impact of agricultural traffic currently using the site and the nearby road junction. Mitigation would be possible at planning application stage.</p> <p>Photographs and discussion of Surface Water Flooding problems are included in the Environment, Landscape and Biodiversity Evidence Report (p.20) and is dealt with in Policy HNTS 23. This policy was originally drafted</p>	<p>No action.</p> <p>No action</p>

CONSULTEE	COMMENT FORM NO:	EMAIL NO:	COMMENTS	RESPONSE	ACTION TAKEN
<i>Allocation of Sites</i>			<ul style="list-style-type: none"> <li>▫ Suggests Lead Local Flood Authority (LFA) is referenced in HNTS 2 and HNTS 9.</li> <li>▫ Suggests specific policy be added relating to Surface Water Flooding.</li> </ul>	<p>and revised in consultation with Anglian Water's Spatial Planning Manager and has been revised further in the light of comments from other AW departments following Regulation 14 consultation.</p> <p>NCC is Lead Flood Authority for flooding for major development and should be referenced as requested.</p> <p>This is a comprehensive policy dealing with surface water flooding. However, most if not all of its provisions are dealt with in the following NDP Policies: HNTS2 (Flood Risk Area), HNTS 4 (Adaptation &amp; Resilience Zone), HNTS 7 (Natural Capital), HNTS 9 (Touring &amp; Permanent Holiday Accommodation), HNTS 23 (Water Resource Management). Adding this policy would duplicate existing provisions in the plan which adopts an approach more appropriate to specific local circumstances.</p> <p>The HELAA process followed in the development sites assessment screened for flood risk (HNTS 13B)</p>	<p>HNTS 2 and 9: Amended to include references to Lead Local Flood Authority.</p> <p>No further action required.</p>
<i>Historic Environment</i>			<ul style="list-style-type: none"> <li>▫ Value of Heritage Report is acknowledged along with integral contribution of Heritage and</li> </ul>	<p>Acknowledged</p>	<p>HNTS 18: Changes inserted in policy and</p>

CONSULTEE	COMMENT FORM NO:	EMAIL NO:	COMMENTS	RESPONSE	ACTION TAKEN
			<p>Archaeology. Recognition of the importance of landscape features making the pattern of Heritage Assets is welcomed. Appropriate use of NHER data based on previous advice is noted.</p> <ul style="list-style-type: none"> <li>▫ Warn that changes to NHER are ongoing</li> <li>▫ Suggests two amendments to HNTS 18 with regard to Historic Environment.</li> <li>▫ Offer of advice on content and location of interpretation panels</li> </ul>	<p>Noted</p> <p>Acknowledged</p> <p>Noted with thanks</p>	<p>supporting text.</p> <p>Supporting text modified to reflect this</p> <p>Majority of proposed modifications to policy wording have been accepted/included.</p>
NORFOLK ORNITHOLOGICAL ASSOCIATION		19	<p>Automated acknowledgement and will respond later.</p> <ul style="list-style-type: none"> <li>▫ Congratulations on documentation.</li> <li>▫ Supports underlying philosophy to preserve and enhance environment.</li> <li>▫ Concerns relating to sustainable travel and tourism section, specifically the provision of more footpaths which it is considered would only increase footfall and not ease pressure on Holme Dunes.</li> <li>▫ Concerns over the Adaptation and Resilience Zone (ARZ) as there is virtually no parking and realistically most of the public do not use public</li> </ul>	<p>The NDP cannot reduce the number of visitors to Holme which is clearly growing year on year. The intention and only viable solution is to disperse pressure from the Protected Sites. This is the justification for encouraging the use of other footpaths in the Parish, particularly those to the South of the A149.</p> <p>If the land becomes available new footpaths to Drove and Old Hunstanton will provide alternative visitor destinations and divert some footfall from the most sensitive biodiverse sites.</p> <p>The purpose of the Zone is to provide a response to the SMP and to diffuse pressure from the</p>	<p>Support acknowledged.</p> <p>No policy changes but following liaison with the NOA, the Parish Council is now working closely with the NCC ENDURE Project Team to develop a Visitor Management Plan for the Parish. This will involve a wide group of stakeholders including the NOA. Visitor surveys are planned for 2019 to cover all of the main access points to the Protected Sites.</p>



CONSULTEE	COMMENT FORM NO:	EMAIL NO:	COMMENTS	RESPONSE	ACTION TAKEN
			<p>transport.</p> <p>▫ Specific request for amendment to section 19.2.6 to remove reference to NOA hide.</p>	<p>Protected Sites. It is consistent with the National Ecosystems Services Assessment's aim of providing larger, more integrated spaces for wildlife and biodiversity. A significant source of damage to the Protected Sites is connected with visitors arriving and moving within the sites by car. The ARZ, on the other hand can be accessed directly from the bus stop serving the Peddars Way/National Trail. Discussions with the National Trails/NCC indicate that this is increasingly well used to access the developing walking opportunities within the Parish including the new Ringstead Circular Walk which is closely linked to the ARZ.</p> <p>The NCC survey carried out in conjunction with the SADMP HRA concluded that visitor pressure from people accommodated within the village is a major component of the problem.</p> <p>Remove reference as requested.</p>	<p>No action</p> <p>Reference to NOA hide in HNTS 17 supporting text 19.2.6 removed</p>
NORFOLK WILDLIFE TRUST	4	22	<p>▫ Impressive Plan and broadly supportive and considers the zone-based approach helpful and an example that could be followed by other NDPs.</p>	<p>Strong support for Zones and Ecosystems Services.</p>	

CONSULTEE	COMMENT FORM NO:	EMAIL NO:	COMMENTS	RESPONSE	ACTION TAKEN
			<p>Strong evidence base.</p> <ul style="list-style-type: none"> <li>▫ Only commented on policies related to biodiversity and climate change.</li> <li>▫ Indicated support for policies but some additional suggestions;</li> </ul> <p>HNTS 1 and 3: Net gain in biodiversity to be included.</p> <p>HNTS 2 supported – especially given sensitivity of Broadwater Road Area</p> <p>HNTS 4: Very supportive of proposals for Adaptation and Resilience Zone but want the provisions to apply to the Countryside Zone.</p> <p>HNTS 5: Parts of countryside zone maybe subject to managed realignment in the future and could evolve into Coastal Habitats.</p> <p>HNTS 21: Strong support but needs references to Protected species (esp Natterjack Toads).</p>	<p>The net gain principle is addressed by HNTS 7 (Natural Capital and Ecosystem Services) and referenced in the last para of the supporting text</p> <p>Noted</p> <p>Support noted. Sympathetic to this view but greater flexibility is required in the Countryside Zone for consistency with the LDF and the NPPF.</p> <p>Helpful point and proposed text</p>	<p>Duplication maybe unhelpful so no change made. Every policy is subject to all other policies in the Plan.</p> <p>No change made.</p> <p>Proposed modification added to supporting text.</p> <p>Addition made to supporting text</p>
NORTH NORFOLK		4	Acknowledged with query as to whether sent to		No action required.

CONSULTEE	COMMENT FORM NO:	EMAIL NO:	COMMENTS	RESPONSE	ACTION TAKEN
DISTRICT COUNCIL			incorrect Council.		
NORMAN Wendy (Resident)	16		<ul style="list-style-type: none"> <li>▫ Supports all policies except HNTS 8: Enough good footpaths in the area</li> <li>▫ HNTS 4: Would not like to see cycle ways in the area - walkers and cyclists do not mix.</li> </ul>	<p>Noted – minority view</p> <p>HNTS 4: Reflects national support for cycle ways as a sustainable form of transport.</p>	<p>No action</p> <p>HNTS 4: No action required to policy but supporting text amended to reflect safety considerations with respect to user safety considerations.</p>
OLD HUNSTANTON PARISH COUNCIL	1	15	<ul style="list-style-type: none"> <li>▫ Excellent plan and will serve as a model for their own.</li> <li>▫ Comment Form completed with all statements being in support.</li> </ul>	Very strong support from our neighbouring Parish acknowledged.	
RENAUT G (Resident) Also see under CRUSO & WILKIN	30		<p>General comments - a lot of work has gone into compiling Plan, should benefit future welfare of village.</p> <ul style="list-style-type: none"> <li>▫ Supports all policies but no indicator on HNTS 9.</li> </ul>	Positive comments from owner of Eastgate Barns site appreciated.	No action required.
ROSSINGTON Ann (Resident)	20		<p>General comments - thanks to the team for such a comprehensive document, should ensure village is set up for future generations.</p> <ul style="list-style-type: none"> <li>▫ Supports all policies but particularly strong support for HNTS 20, HNTS 23 and HNTS 24.</li> </ul>	Support acknowledged.	
RUMBELLOW Clifford (Resident)	28		Supports all policies.	Support acknowledged.	
RUMBELLOW Pauline (Resident)	27		Supports all policies.	Support acknowledged.	
SMITH Pat (Resident)	10		<ul style="list-style-type: none"> <li>▫ Supports all policies</li> <li>▫ HNTS 24: Too dangerous to cycle, speeding traffic a problem particularly at Main Road/Peddars Way crossroads.</li> </ul>	<p>Support acknowledged.</p> <p>Concerns over road safety noted and conflict between cyclists/pedestrians noted</p>	Supporting text to HNTS 4 amended to reflect safety considerations
SPORT ENGLAND		5	Automated acknowledgement referring to paragraphs 96, 97 and Section 8 of NPPF regarding assessment of need for sports facilities and healthy communities.	Noted. There is emphasis in plan on health and well being benefits eg Local Green Spaces and AONB, Footpaths	No action required.

CONSULTEE	COMMENT FORM NO:	EMAIL NO:	COMMENTS	RESPONSE	ACTION TAKEN
SOUTH HOLLAND COUNCIL			Acknowledged with query as to why it had been sent as HNTS not in its district.	Noted.	
STANLEY Kalven & Helen (Residents)	6		<ul style="list-style-type: none"> <li>▫ General comments - no dark skies, inadequate signage, sewerage issues, oversized new homes and builders' vans/noise.</li> </ul>	<p>Strong support noted for policy package especially dark skies, sewerage, traffic, street scene and oversized homes</p> <p>Concerns acknowledged. Reported sewerage problems on Eastgate to be investigated by Parish Council.</p>	No Action wrt NDP
SUFFOLK COUNTY COUNCIL			Automated acknowledgement and will respond as soon as possible.		No action required.
WASH & NORTH NORFOLK MARINE PARTNERSHIP		12	Officer no longer in post and replacement being recruited.		No action required.
WHITE David (NCC Green Infrastructure Team Leader [Principal Ecologist])		16	An excellent Plan. His team would respond as part of NCC's formal response but all comments would be positive.	Strong support acknowledged. No further response received from David White but NCC response dealt with above.	
WRIGHT Esme (Resident)	5		<ul style="list-style-type: none"> <li>▫ Supports all policies.</li> <li>▫ HNTS 13: Pleased about conditions for new homes.</li> </ul>	<p>Support for all policies especially new homes from a neighbour to the proposed allocation site.</p> <p>Acknowledged</p>	

26.08.19.  
C.M.J.

## 27 APPENDIX 20: BOROUGH COUNCIL COMMENTS AT REGULATION 14 CONSULTATION

### Comments on Draft Holme Next the Sea Neighbourhood Plan by Officers of the Borough Council of King's Lynn & West Norfolk

#### Regulation 14 Consultation comments.

These comments were reviewed at a meeting with the BC Planning Policy Team on 21 August 2019.

The action taken column shows the agreed approach to addressing the comment in question.

Title / Policy	Comments	Suggested Change	Action Taken
General	Overall the plan is presented well and set out logically. The policies are clearly distinguishable from the supporting text and other parts of the plan. The maps are clear and easy for readers to use. There is a wealth of supporting material and information to support the overall thrust of the plan and the detailed policies.	Acknowledged	None
Development Boundary / Zonal Approach	Think this an excellent way of defining the different areas of the parish/village and really adds detail	Acknowledged	None
Policy numbering	Just check this, in some of the policies it references other policies and numbers quoted might be wrong?	Check cross-referencing	Removed cross referencing to avoid problem
HNTS7	Is it clear how developments can achieve an overall positive impact...? What they will be benchmarked against / How will we know that the developer is able to demonstrate this and meet the policy requirements?	Clarify method to be used to provide an indication of impact and make it clear it should be used proportionately	Policy wording revised to require a simple statement from applicants that sets out how proposed development will impact on the ecosystem services and objectives. Scoring method dropped. Supporting text indicates need for a proportionate approach.
HNTS9	Seems appropriate given the level of holiday accommodation compared to the population/number of dwellings in the NP area, given the status of Holme as a Smaller Village & Hamlet, and the sensitive nature of the local environment	Noted	None

Title / Policy	Comments	Suggested Change	Action Taken
HNTS11	Really useful policy and adds extra detail that the development management planners will be able to use when determining planning applications	Noted	None
HNTS13	Feel that this covers two distinct areas and should be formally split into two policies	Split into two policies	Split into two policies – New Homes and Site Allocation
HNTS15	<i>'Where permission is granted consideration will be given to the control of further extensions by reduction or removal of permitted development rights.'</i> – What do you mean by this? How would this work> not sure if the application is for an extension as part of that you can place such restrictions on the house?	None	None (Policy previously revised on advice from DM at BC and checked by Legal Dept).
HNTS16	Does this need to be controlled by both a condition and S106 agreement? Perhaps consider how this will be monitored?	None (Both needed)	No action taken
HNTS19	Dark Skies – do you mean all development? Don't forget PD rights, lighting isn't generally conditioned. What is to stop people changing lightbulbs? Having said this we feel that is important to have a policy which covers this topic however it could be more encouraging rather than the stick approach as it might be difficult to enforce	Can we tweak policy to relate to conditions in which it would impact?  Check NPPF, Broads Plan and advice of NCP	Checked examples. Broads Policy too complex for SVAH. Policy wording checked and reflects NCP current advice and is consistent with NPPF 180c  Agree with points made but this is a very popular topic that may change peoples' attitudes and behaviour. Becoming a feature of plans in AONBs and National Parks as well as many NDPs.  No action taken

Title / Policy	Comments	Suggested Change	Action Taken
HNTS22	Do you mean all development? The policy as written isn't clear, how will it be interpreted? What will developers need to show? Is it enforceable?	Indicate where appropriate a construction Management Plan may be requested.	<p>Policy reviewed. Found not to be consistent with NPPF because it focused on regulation and not land use. Now has clear requirement which can be evaluated – "... Development proposals will be permitted provided they can demonstrate...."</p> <p>Also policy now states <i>"where appropriate, a construction management plan may be requested to show how any possible impacts... will be appropriately identified, managed and minimised"</i></p>



## 28 APPENDIX 21: RESPONSE TO OCEAN BREAKS (ABBEY GROUP)

### 1.1 Introduction:

- 1.1.1 The Abbey Group owns existing buildings and land in the village. Some of the properties are occupied as holiday lets under the name of Ocean Breaks. The contribution the Abbey Group make to the local economy is recognised.
- 1.1.2 The company responded to the Borough Council's call for sites and the land in question was evaluated as part of the NDP site allocation process. The HELAA identified that the site had limitations and it received a poor overall score (see NDP Housing Report). It also received little support from local people in response to the 2018 community consultation. A previous appeal against refusal of planning permission for development on the same site was dismissed.

### 1.2 Summary of the Abbey Group case

- 1.2.1 As a general point they suggest *"The DNP does not list out the strategic policies of the Development Plan and it is therefore not possible to consider conformity of the DNP against any adopted planning policies. This should be clarified and the relevant policies clearly listed"*.
- 1.2.2 They are concerned that *"it is not appropriate to allow for the DNP to cover the period to 2036 due to the potential incorporation of provisions for Neighbourhood Plans within the new Local Plan. It is also possible that strategic policies may change which would render the DNP being inconsistent with the Local Plan"*.
- 1.2.3 They contend in relation to Section A, paragraph 2.4.15 that *"The language within this paragraph is inappropriate. It is not for the planning system to prevent inward investment within the parish and in any event tourist uses are supported by Core Strategy Policy CS10."*
- 1.2.4 The precautionary approach advocated in Para 2.4.16 of Part A is inconsistent with Core Strategy policy CS10 and NPPF Para 83. A more positive approach should be adopted as there is no evidence that further tourist uses are not required and given the DNP assumes 202 mobile homes in the village of a correct figure of 130 there is scope for additional provision without impacting on the perceived figure of 202.
- 1.2.5 Abbey object to Policy HNTS 8 Sustainable Travel and Tourism. They suggest the 'recreational facilities' element of the policy is renamed 'tourism' and claim the policy does not deliver any new facilities and is in direct conflict with Core Strategy Policy CS10.
- 1.2.6 In relation to Policy HNTS 9 (Touring and Permanent Holiday accommodation) they contend that *"the third paragraph of the policy is negatively worded and there is no evidence to show that additional accommodation is not required – in fact DNP Policy HNTS 6 (Drove Orchards) supports new tourism uses which could include additional accommodation. The policy is in conflict with Core Strategy Policy CS10 and NPPF paragraph 83"*.
- 1.2.7 The capacity of mobile accommodation is questioned (Supporting text Policy HNTS 9 (Touring and Permanent Holiday accommodation) Paragraph 11.2.6). It is suggested that more, smaller-scale tourist accommodation is needed.

1.2.8 In Para 11.2.8 in the supporting text for Policy HNTS 9 (Touring and Permanent Holiday accommodation) Abbey disagree with the justification for limiting the growth of touring and permanent holiday accommodation. Specifically they consider the four bullet points to be inaccurate because:

“

- *In relation to travel to adjacent settlements the village is within a rural location and it is to be expected that car journeys may be required: this does not create a greater than average trip generation as such trips are commensurate with those of other residents in the village. In any event the village benefits from existing facilities and also has a good bus service.*
- *It does not follow that any surplus of accommodation within Heacham or Hunstanton means that such accommodation would not be sought after in Holme. The tourist facilities within Heacham and Hunstanton are different to those in Holme.*
- *Not qualifying to pay CIL is not in our view a reason to not provide further accommodation.*
- *Any impacts arising from visitor pressure are unlikely to be significant and mitigation can be secured if required. Such mitigation will inevitably assist wider objectives. Doing nothing will require public money to be used to deliver the necessary mitigation and we therefore question the deliverability in that scenario.”.*

1.2.9 They suggest that paragraph 6.2.4 of the report on the Parish Economy should be deleted and replaced with a reference to Policy CS10 which supports sustainable tourist related development including new accommodation.

1.2.10 The Abbey Group request an oral hearing because they suggest the Draft NDP is inconsistent with Strategic LDF Policies and the NPPF

1.2.11 They contend that the NDP does not satisfy the basic conditions test for the reasons set out in their objections and because:

- It doesn't contribute to the achievement of sustainable development
- General conformity with the strategic policies of the LDF has not been demonstrated

### **1.3 Response to the Abbey Group's representations**

The Abbey Group's comments fall into four categories:

- Conformity of the NDP with the overarching development framework
- Inappropriate NDP timeframe
- Precautionary approach and confusion over the number of mobile homes
- Consistency with national and local plan policies for tourism and rural development – especially NPPF 83 and Core Strategy Policy CS10

The response is presented below under these headings.

#### ***Conformity of the NDP with the overarching development framework***

1.3.1 Following each policy in the NDP there is a list of supporting policies and evidence documents accompanied by supporting photographs and captions which relate to the policy

issues. These include the National and Local Plan Policies that are judged to be relevant to the NDP policy in question. It is felt that this will be helpful to the Local Community who may not be familiar with the Local Plan or the NPPF and encourage policy-based comments on planning applications.

- 1.3.2 The NDP has been developed as a result of close collaboration and support from the Borough Council's Planning Policy Team and specific help from the Development Management Team. This has been an iterative process involving the drafting and revision of the policies designed to ensure consistency with the overarching planning framework.
- 1.3.3 Although it is recognised that the draft NDP will not be tested against the policies in the emerging local plan, the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions and for this reason this has been taken into account where possible.
- 1.3.4 A table demonstrating the relationship between NDP policies and those of both the NPPF and the Local Plan is included in the Basic Conditions Statement. This identifies the correspondence between NDP policies and the strategic policies of the Local Plan in order to meet Mr Brand's requirements. The contribution of each policy to sustainable development is also included.

#### ***Inappropriate NDP timeframe***

- 1.3.5 Paragraph: 003 Reference ID: 41-003-20190509 of the Neighbourhood Planning Guidance indicates that "*Neighbourhood planning provides the opportunity for communities to set out a positive vision for how they want their community to develop over the next 10, 15, 20 years in ways that meet identified local need and make sense for local people*".
- 1.3.6 Paragraph: 084 Reference ID: 41-084-20190509 addresses the question of how the NDP relates to the Local Plan through time. This recognises that '*policies in a neighbourhood plan may become out of date, for example if they conflict with policies in a local plan covering the neighbourhood area that is adopted after the making of the neighbourhood plan. In such cases, the more recent plan policy takes precedence*'.
- 1.3.7 Paragraph: 106 Reference ID: 41-106-20190509 makes provision for updating NDPs in a variety of ways so that these issues can be addressed.
- 1.3.8 It is anticipated that the close collaboration between the NDP team and the Borough Council should help to minimise these issues.
- 1.3.9 In view of the above there is no case for changing the time horizon of the Neighbourhood Plan.

#### ***Precautionary approach and confusion over the number of mobile homes***

- 1.3.10 The precautionary approach advocated in paragraph 2.4.16 is justified as a positive response to the Shoreline Management Plan as set out three paragraphs previously in 2.4.13. This is consistent with the requirements of NPPF paras 149 and 150 "*to ensure the future resilience of communities and infrastructure to climate change impacts*".
- 1.3.11 The objection makes the incorrect observation that the NDP assumes there are 202 mobile homes within the village when in fact the correct figure is around 130. On this basis it is

suggested that further provision of mobile homes could be made without impacting on the perceived figure of 202.

- 1.3.12 Paragraph 11.2.5 of Policy HNTS 9 (Touring and Permanent Holiday Accommodation) states that there are 130-140 caravans/mobile homes in the Parish and this is the figure used in the Plan. The figure of 202 Mobile or Temporary Structures is taken from the 2011 Census and the Socio-Economic Profile Report explains basis for this (pages 11-12) which arises as a result of the methodology employed by the 2011 Census. For this reason the NDP team have used aerial photography to identify the number of mobile accommodation units in the Parish. This varies (130-140) from time to time but there is absolutely no perception that there is a higher number or a difference that could be 'made up'.

**Consistency with national and local plan policies for tourism and rural development – especially NPPF 83 and Core Strategy Policy CS10**

- 1.3.13 NPPF 83 (c) supports “sustainable rural tourism and leisure developments which respect the character of the countryside”
- 1.3.14 The context for policy CS10 recognises that “the main tourist appeal in the borough is based on the unique natural environmental assets and the historic built environment that reflects the heritage of our towns” .... and “Care is needed when considering locations for growth, but also in considering how to build upon the existing tourism offer and facilities”.
- 1.3.15 The Policy recognises the importance of the settlement hierarchy in determining appropriate locations for a variety of different types of tourist development to ensure that it makes an effective contribution to the economy; makes sustainable use of existing services/facilities and protects the natural and heritage assets that underpin the regions attractiveness.
- 1.3.16 In the context of the nearby town of Hunstanton, it is noted that “Significantly it is a tourist destination attracting large numbers of visitors, and this makes a vital contribution to the local economy. Consultation has told us that there is a strong desire to build on the local economy, both extending the tourist season and creating year round employment”.
- 1.3.17 The Policy CS10 itself seeks to promote “the expansion of the tourism (including leisure and culture) offer in Hunstanton to create a year-round economy” .... It makes clear that “Smaller scale tourism opportunities will also be supported in rural areas to sustain the local economy, providing these are in sustainable locations and are not detrimental to our valuable natural environment” .... “The Council will permit the development of new tourism accommodation in rural areas subject to the following criteria being met:” Including it “ ..... Will not be detrimental to the landscape...” and “...In the Countryside, preservation of the natural and historic environment should be a priority”.
- 1.3.18 It is thus evident that neither NPPF 83 nor CS10 provide unconditional support for the development of tourism facilities and both recognise the importance of local environmental considerations such as those that exist in Holme - ie it is in the lowest tier of the Settlement Hierarchy with very limited services; It is a rural Parish entirely within the Norfolk Coast Area of Outstanding Natural Beauty and has a highly sensitive environment with more than 42%

of the Parish protected by international conservation designations. A similar area of the Parish is at risk from climate change and associated flooding (Shoreline Management Plan) and there is already evidence of environmental damage associated with growing visitor pressure (NDP Landscape Report, Liley and Panter, N.E State of the Norfolk Coast).

- 1.3.19 Achieving sustainable development in these circumstances requires careful balancing of economic social and environmental considerations. The Abbey group objection does not refer to either the social or environmental factors that must be weighed when applying NPPF 83 and CS10. It also fails to recognise that the starting point for achieving balanced, sustainable development must acknowledge the existing conditions in the Parish.
- 1.3.20 The thrust of the previous two paragraphs is, however, recognised in the LDF – specifically in Policy DM11 (Touring and Permanent Holiday Sites) of the SADMP. This Policy recognises the pressure for development of tourist facilities in the northern part of the Borough and specifically in the AONB and the need *“to ensure that there is a correct balance between encouraging tourism and other policy aims of controlling development in the countryside”*. In weighing these considerations DM11 states *“Small scale proposals for holiday accommodation will not normally be permitted within the Norfolk Coast Area of Outstanding Natural Beauty (AONB) unless it can be demonstrated that the proposal will not negatively impact on the landscape setting and scenic beauty of the AONB .... Proposals for uses adversely affecting Sites of Special Scientific Interest (SSSIs) or European Sites will be refused permission”*.
- 1.3.21 In order to ensure sustainable development meets the wider public and economic interest DM11 explains *“There is already a high quantity of varied tourist accommodation available, and it is preferable to protect this source of accommodation rather than construct new holiday sites in the countryside, particularly within the AONB”*. Clearly Policy DM11 is justified but is overlooked in the Abbey Group’s representation.
- 1.3.22 The claim that the NDP runs counter to NPPF 83 and CS10 is thus incorrect and a broader consideration of the policy framework including SADMP DM11 makes this clear. The situation faced by the NDP is that there is substantial developer pressure to create (need in the words of the objection) tourist accommodation in Holme. There is no demonstrated need and for environmental reasons this type of development needs to be controlled. The overarching policy framework indicates that inward investment in **mobile tourist accommodation** will not deliver sustainable development in Holme. This is not to say that other forms of investment need to be restricted.
- 1.3.23 Policy HNTS 8 seeks to promote sustainable development by supporting investment in more sustainable modes of movement linking existing tourist facilities in Hunstanton, Old Hunstanton and Drove Orchards whilst at the same time diffusing Visitor Pressure on the oversubscribed Protected Sites. It also facilitates proposals for small scale, low key recreational facilities and provides examples of what these might be. The purpose of HNTS 8 is not to deliver new investment in tourist accommodation and it is contended that its title is appropriate given its function
- 1.3.24 It is acknowledged that Abbey have already made capital investment in Holme through their purchase of village houses in connection with their holiday letting business. There is nothing

in the NDP that would prevent them from continuing to compete in the existing Parish housing market in order to grow their business in the future.

- 1.3.25 Policy HNTS 9 seeks to ensure a sustainable future for existing businesses providing touring and permanent holiday accommodation against the background of the SMP, Climate Change and sea level rise. Given NPPF 83, Core Strategy CS10 and SADMP DM11 it is inevitable and appropriate that the third paragraph of the Policy is negatively worded to protect both the AONB and International conservation sites from present and future threats.
- 1.3.26 Looking to the future, many caravan sites in Hunstanton and Heacham are at risk from Climate Change and flooding to the extent that costs of coastal protection are now falling on local businesses. With hindsight, failure to regulate the development of these sites has left a legacy of problems which are now being exacerbated by Climate Change and sea level rise and may ultimately impact on the public purse. Pressure to relocate these businesses to safer, more attractive green field sites can be expected to grow. In North Norfolk where an analogous situation exists, provision for such relocation is being made proactively through the Local Plan which encourages caravan businesses to relocate to the rural hinterland outside the AONB.
- 1.3.27 The approach adopted in HNTS 9 is not unusual. For example, in responding to very similar circumstances, the North Norfolk LDF Development Management Policy EC10 states "*New touring caravan and camping sites will not be permitted within the Norfolk Coast AONB, Undeveloped Coast or Environment Agency Flood Risk Zone 3*".
- 1.3.28 With regard to possible inconsistency between HNTS9 and HNTS6 (Drove Orchards), the existing Touring and Permanent Holiday accommodation all lies beyond the zone boundary. Policy HNTS 6 provides for new development by an established business that is directly related to the agricultural use of the site "*or is for tourism uses which are compatible with and related to the special characteristics of the AONB and the important habitats of the North Norfolk Coast*".
- 1.3.29 NDP Part B, Paragraph 2.1.3 states that "*Each policy in the NDP is subject to all other policies in the Plan...*". Policy HNTS 6 is consistent with and subject to Policy HNTS 9 which would preclude development of touring and permanent holiday accommodation. However, this Policy makes provision for the development of different aspects of the tourist economy subject to the above considerations, at a location in the Parish that reflects the preferences of local people in conformity with the Localism Act. It is an additional example of how the NDP complies with NPPF83 and Core Strategy Policy CS10 in a way that reflects environmental constraints.

## 29 APPENDIX 22: RESPONSE TO LANPRO (FOR AR&V INVESTMENTS)

### 1.1 Introduction:

- 1.1.1 The objection to the NDP submitted by Lanpro contains a mixture of strategic objections to the NDP made on policy grounds but a number of objections which relate specifically to their client's site(s) (the Poplars and Inglenook on Main Road, Holme). This site has been the subject of several planning applications and is currently the subject of an appeal against enforcement action by the Borough Council alleging *inter alia*, it is being used as an unauthorised camping and caravan site. A hearing to consider the appeal against the enforcement will be held on 17<sup>th</sup> September, 2019<sup>1</sup>.
- 1.1.2 It would be inappropriate to engage with the objections which are site specific as this would require pre-judgement of the hearing's outcome. It should also be noted that three members of the NDP team and two further members of the Parish Council are neighbours of the site(s) (this reflects its location and extent). To avoid pre-judging the outcome of the hearing and conflict of interest, this reply will restrict itself to the substantive policy issues raised by Lanpro.

### 1.2 Summary of the Lanpro case

- 1.2.1 Lanpro agree that the NDP has correctly identified 'the various opportunities' that could be promoted and delivered but has failed to explore many of those listed. Their client, AR&V investments Ltd would like the NDP to further explore '*the opportunities relating to building a stronger community by investigating available sites for new homes to better balance the community and improve community facilities*'.
- 1.2.2 They accept that the NDP correctly identifies the problems the Village is currently experiencing but allege that it does nothing to address them. They list these as '*a high proportion of second homes, low occupancy rates with first homes, lack of employment opportunities, a resulting lack of local spend and services and a large economically inactive ageing population*'.
- 1.2.3 In this respect they maintain that the NDP does not properly examine the reasonable alternatives based on all the evidence collected. It does not accord with NPPF para 16 because it is '*not positively prepared*'; '*does not deliver sustainable development of the type required*'; '*is not aspirational enough*'; '*has not engaged with their clients in arriving at the strategy advocated*'; '*does not seek to support their Client's camping and caravan site uses*'; '*seeks to duplicate and unreasonably reinforce existing legislation*'. The Plan is therefore not sound and does not meet the tests of soundness set out in NPPF para 35.
- 1.2.4 They conclude that their client '*objects to the NP on the basis that the Pre-Submission Consultation NP is not sound and doesn't pass the tests of soundness as outlined in paragraph 35 of the NPPF*'.
- 1.2.5 More specific, substantive objections are raised in relation to the Village Zone/Development Envelope (HNTS 2), Housing Policy (HNTS 13A and B) and Touring/Permanent Holiday Accommodation (HNTS 9). The grounds for these objections are set out in the next three sections before each is addressed in the remainder of this response.

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<sup>1</sup> At the date of completing this report it is understood that this hearing has been cancelled and is expected to be replaced by a Public Inquiry early in 2020.

- 1.2.6 Finally, there is an objection that their client (AR&V Investments Ltd) has not been consulted and has not had the opportunity to put forward proposals for the Poplars/Inglenook site. This will be addressed at the end of the response before final comments on points of detail.

### **1.3 Holme Village Zone & Development Envelope (HNTS 2)**

- 1.3.1 Lanpro contend that the development envelope is drawn '*overly tight to deliberately restrict organic and infill growth within the village*' and that it should be redrawn to include their client's (alleged) existing caravan, motorhome and camping sites known as Inglenook and Poplars in order to allow '*sensitive infilling*' that would address the imbalance in housing stock within the village. They go on to suggest that '*part or wholesale redevelopment*' of these sites (ie the Poplars and Inglenook) including the replacement of static caravans could lead to a wider landscape improvement.
- 1.3.2 They further contend that '*there are small appropriate employment and leisure related development sites within the village that represent opportunities to meet local housing needs in addition to the gaps between or adjacent to existing dwellings*'. It is unclear which sites are being referred to and their current development status. (The NDP team is aware that there are several substantial fields around the periphery of the village that have been acquired by speculative developers).
- 1.3.3 Following the 2018 Consultation changes were made to the Development Envelope primarily to reflect the advice of the Borough Council's Planning Policy and Development Management Teams. These resulted in a tighter development envelope, primarily to protect against back land development. This is in keeping with the approach followed elsewhere in the Borough and reflects the Council's poor experience with back land and tandem development.

### **1.4 Housing policy HNTS 13A and HNTS13B**

- 1.4.1 Underpinning the argument for release of more development land is the following statement - '*My client contends that the NP cannot correct the identified "imbalance in the resident population and housing stock" outlined as an objective on page B-11 without creating additional new housing opportunities at a variety of scales, types and levels of affordability*'. They note, furthermore, that it will '*deliver no more than a modest number of high value second home and/or retirement accommodation for downsizers moving into the area*'.
- 1.4.2 Lanpro suggest that the NDP fails to devise a strategy '*to meet an existing need from households already resident in the village and living in the wrong kind of mobile and temporary accommodation*'.
- 1.4.3 They also suggest that the strategy advocated is '*to restrict the size of homes to a level where they are not suitable as family accommodation to re-balance the housing stock and then restrict supply to a level where the cost of new homes is artificially inflated still further due to unmet demand*'.
- 1.4.4 They contend that there are 202 static and mobile caravans being used as permanent affordable housing in within the village and that as a result of the high demand for second homes, rising house prices and local residents wanting to remain in the village this is the only form of affordable housing accessible to people in the area. It thus follows that a more



relaxed development boundary, including the caravan sites would enable their replacement with housing that would meet this (area wide) assessed need for better and more affordable forms of affordable accommodation.

## **1.5 Touring and permanent holiday accommodation – HNTS 9**

- 1.5.1 Lanpro state that their client as owners of an existing ‘established rural business’ object to policy HNTS 9 because it ‘*seeks to prevent the intensification and/or expansion of existing sites regardless of need, environmental benefits/impacts and landscape capacity/impact or the planning, housing need and or socio-economic merits of any proposal*’. They believe that this policy will damage their client’s business and that it is ‘*wrong, misleading, contrary to the planning permissions granted and/or lawful uses and further seek to duplicate other UK legislation and established case law*’. They suggest it is unacceptable to require restoration of existing areas when their tourist use ceases and/or relinquishment of use rights.

## **1.6 Response to Lanpro’s objections**

- 1.6.1 Before making a detailed response, attention is drawn to the final sentence of Mr Atkinson’s letter trusting that his representations are ‘made correctly’. Unfortunately they are not. One fundamental mistake stands out in particular relating to the Parish’s housing stock.
- 1.6.2 Lanpro assume that there are 202 mobile homes in the Parish ‘*being used as permanent affordable housing*’. This is not the case. The mobile homes in the Parish are holiday accommodation and are subject to occupancy restrictions which limit their use. They do not reflect pent up demand for Principal Homes.
- 1.6.3 The result of this mistake is that Lanpro have grossly overestimated the demand for (affordable) housing in the Parish and this undermines much of their case. Nevertheless, their main points will be addressed below.
- 1.6.4 The objections raise three key questions:
- Has the NDP made sufficient provision for building new homes, tourist and community facilities?
  - Has sufficient attention been devoted to exploring appropriate development sites and identifying the best alternatives. Specifically, should the AR&V Investments Ltd site at Inglenook and the Poplars have been allocated for development in the NDP?
  - Is redeveloping existing caravan sites for housing an appropriate strategy for the NDP and should policy HNTS 9 be removed to enable their replacement or because it is not positively worded and consistent with the LDF/NPPF?
- 1.6.5 In addressing these questions the response will begin by dealing with the points raised in relation to the housing policy (HNTS 13A and 13B) in Section 1.3 above. It will then consider whether there is a case for changing the proposed development boundary to accommodate AR&V Investment Ltd’s site and other sites in the Parish. Finally, it will conclude by considering their comments summarised in Section 1.4 concerning Touring and Permanent Holiday Accommodation.

***Has the NDP made sufficient provision for building new homes, tourist and community facilities?***

- 1.6.6 Judging the amount of development needed (and feasible) in Holme needs to balance consideration of housing need, LDF housing policy requirements, community aspirations/preferences, economic considerations and environmental constraints (protected sites and the SMP). Achieving a correct balance is essential to achieving true sustainable development. It is noted that the Lanpro objection provides no economic or social justification for its position and gives no consideration to environmental constraints.
- 1.6.7 The NDP has developed an extensive evidence base with hard data setting out *inter alia* relevant policy background, community aspirations, social and housing considerations, housing need, economic position and opportunities and environmental matters including constraints and opportunities. This is contained in the reports attached to the draft Plan.
- 1.6.8 With regard to housing, the NDP approach and level of provision has been arrived at after discussions with the Housing and Planning Policy Teams at the Borough Council following in depth analysis of Census, VOA and local survey data. The analysis revealed that Holme has a declining/ageing resident population, a very high level of second homes and an imbalanced housing stock resulting from a trend towards replacing small houses/bungalows within the financial reach of local people by much larger dwellings designed for the second home/holiday let markets.
- 1.6.9 As a Smaller Village and Hamlet (SVAH), Holme has no services beyond the Village Hall, the Pub and the Church although the latter cannot sustain a full time Vicar. It has a bus service to Hunstanton where the nearest services are located but the vast majority of people living or visiting Holme use the car to get to Hunstanton. SVAH's are the lowest level in the LDF settlement hierarchy and as such
- 1.6.10 The LDF is clear - '*New development in the designated Smaller Villages and Hamlets will be limited to that suitable in rural areas*'. With respect to housing the policy indicates '*The sensitive infilling of small gaps within an otherwise continuously built up frontage will be permitted...*'. It is only in '*exceptional circumstances the development of small groups of dwellings in Smaller Villages and Hamlets may be considered appropriate where the development is of a particularly high quality and would provide significant benefits to the local community*' (Policy DM3 SADMP, 2016).
- 1.6.11 As set out in the Housing Report (Section 4.2) it has been agreed that with respect to Borough planning policy and housing targets, it would be most appropriate for Holme to continue to grow by infill at a similar level to that achieved over the last plan period. This level of growth could be expected to deliver c 16 houses. Given the '*exceptional circumstances*' in the Parish set out above, it has also been agreed that a small housing allocation of 5 dwellings would be appropriate to help restore balance in the housing stock.
- 1.6.12 This level of housing growth coupled with the provisions in pre-submission Policies HNTS 13A and 13B (New Homes), HNTS 14 (Replacement Dwellings), HNTS 16 (Principal Residences) can be expected to deliver an additional 30 – 50 permanent residents to the village with at least 10-12 occurring close to the start of the plan period. Based on a 2011 Census figure of 240 residents (now more likely to be c. 216) this amount of housing growth equates to a likely 16 – 20% addition to the resident population.

- 1.6.13 This will help to stabilise the current situation and even 30 new residents would ensure sufficient people living in the village to sustain the Parish Council, run the Open Gardens, the many community events and provide year round support for the Pub and the Church. These things are of great importance to the community and Parish life and are some of the defining characteristics of life in a small English Village.
- 1.6.14 On the basis of the above it is concluded that the amount and type of housing envisaged in the Plan is consistent with the needs and preferences of the local community, will more than meet the requirements expected of an SVAH and demonstrates the flexibility encouraged by the Borough Council. Its environmental consequences are acceptable. Further, it is consistent with the objectives of the NDP. These are clearly specified in Part B of the Plan and not on page B-11 as suggested by Lanpro. This further misunderstanding contributes to the incorrect proposition that the NDP aims to achieve a large scale restructuring of both the housing stock and the Parish community and may go some way to explaining Lanpro's suggestion that the NDP lacks aspiration.

**Has sufficient attention been devoted to exploring appropriate development sites?**

- 1.6.15 The previous section has demonstrated that the NDP housing policies more than meet the requirements of an SVAH for contributing to the supply of housing in the Borough and will satisfy local needs. In conformity with the Localism Agenda the community preferences play a major role in deciding where this housing should be located.
- 1.6.16 The NDP can create space for housing both by designing an appropriate development envelope and by allocating sites.
- 1.6.17 The position of the development envelope has evolved in response to a number of considerations including the existing form and character of the settlement, the established 1998 Plan boundary, and the Conservation Area boundary. Discussions with Statutory Consultees provided particular guidance on its form in relation to flood risk, Protected Sites and heritage considerations.
- 1.6.18 Following community consultation and feedback, advice from both the Planning Policy and Development Management teams helped finalise the design in the light of their experience of operating the boundaries in the 1998 Local Plan.
- 1.6.19 In keeping with SADMP Policy DM2, the development envelope is not intended to reflect the full extent of existing built development in the Parish and excludes parts of Holme where further development is not encouraged. In particular, extensive gardens and other backland are generally excluded from the development boundary, as the Borough Council considers backland development is generally incompatible with the form and character of development it wishes to promote in the area. This approach is strongly supported by the community response to the NDP questionnaire survey. This favours development fronting the existing road network.
- 1.6.20 The capacity of the proposed Development Envelope was assessed using a GIS methodology. The results were reviewed in detail with the Borough Council's Planning Policy Team and found to be capable of absorbing the required amount of housing development.
- 1.6.21 Given the above, the NDP has followed past policy practice and left caravan sites outside the development envelope. This means that they cannot be converted into housing but that

they can continue to support local tourism. Conversion of these sites to housing would be inconsistent with Holmes status as an SVAH (Core Strategy, CS02) and would be harmful to the form and the rural character of the village which the NDP seeks to conserve. In particular, loss of these sites would result in damage to the Parish Economy by virtue of loss of tourist income which supports the pub and other parish businesses.

- 1.6.22 It is thus concluded that the development envelope as drawn is justified because it has been developed by consultation using a criteria based approach. There is clear justification for excluding caravan sites and backland areas based on experience and the planning policy framework.
- 1.6.23 The question remains as to whether the NDP has properly examined the reasonable alternatives in respect of development sites and whether it should have allocated the AR&V Investment site for development.
- 1.6.24 With regard to reasonable alternatives preparation of the NDP has involved detailed and extensive consultation. Two sites came forward through the Borough Council's Local Plan call for sites. A further three were identified directly through NDP public consultations. This resulted in five sites being reviewed as candidates for development in the NDP. Their relative merits were assessed using the HELAA methodology under the supervision of a Chartered Town Planning professional (See NDP Housing Report), Sections 5.4, 5.5 and 7). Further public consultation enabled selection of a preferred option.

**Objection to restrictions on tourist and permanent holiday accommodation (HNNTS 9)**

- 1.6.25 The NPPF supports tourism and sustainable leisure developments as part of creating a prosperous rural economy. However, it is now recognised by many planning authorities that caravan and other mobile accommodation sites can have a substantial negative impact on the surrounding environment and can be harmful to the natural assets on which they depend. This is a particular issue for the sensitive landscape of the AONB.
- 1.6.26 In Hunstanton and Heacham many caravans are at risk from Climate Change and flooding to the extent that costs of coastal protection are now falling on local businesses. With hindsight, failure to regulate the development of these sites has left a legacy of problems which are now being exacerbated by Climate Change and may ultimately impact on the public purse. Pressure to relocate these businesses to safer, more attractive greenfield sites can be expected to grow. In north Norfolk where an analogous situation exists, provision for such relocation is being made proactively through the Local Plan which encourages caravan businesses to relocate to the rural hinterland outside the AONB.
- 1.6.27 In the North Norfolk LDF Development Management Policy EC10 states *"New touring caravan and camping sites will not be permitted within the Norfolk Coast AONB, Undeveloped Coast or Environment Agency Flood Risk Zone 3"*.
- 1.6.28 Reflecting similar issues LDF policy (SADMP DM11) takes the view that *"new sites and extensions to and intensification of existing sites will not normally be permitted within the Norfolk Coast AONB, SSSIs and the flood Hazard Zones"*.
- 1.6.29 The entire Parish of Holme lies within the AONB and is less than 5 km from the affected sites in Hunstanton. Over 40% of the Parish is covered by International Protected Sites and all of the Parish is within walking distance of these. A combination of outstanding landscape and

rich biodiversity make it an obvious target for both relocation of existing caravan sites and new developments. However, the Protected Sites are already under severe visitor pressure (see NDP Landscape report, Natural England State of the Norfolk Coast Report) and showing signs of damage.

- 1.6.30 Given the precedents set in other local plans and the policy position in the Borough's Local Plan, the NDP policy is justified in protecting the natural assets on which the Parish Economy depends from expansion of this particular type of development. The Policy recognises the importance and economic value of the Parish's long established sites and given that significant parts of these sites are at risk from flooding makes provision for these developments to increase resilience to flooding and adapt to climate change.
- 1.6.31 Given the importance attached to the AONB landscape and its economic value as a finite resource, the reinstatement of vacated facilities is important. It is not considered reasonable to create potential brownfield sites in these location which would damage the landscape, damage the visitor experience and could contribute to pressure for other forms of inappropriate development.
- 1.6.32 Policy HNTS 9 is generic in nature and there is no justification for removing it on the basis of the planning status of a single site which is the subject of a Planning Enforcement inquiry.

**Failure to consult**

- 1.6.33 The approach to consultation for the NDP has included communications and information distribution via the dedicated NDP website, the Village Information Network, door to door leaflet distribution covering every household and business in the Parish, village notice boards and local Parish magazines (Link and Hunstanton Town and Around), three major Village Hall consultation events plus exhibitions and reports at monthly Parish Council meetings.
- 1.6.34 Talks with landowners, businesses and developers have been solicited as part of this process. This was carried out in parallel with the Call for Sites issued in connection with the Local Plan Review. AR&V's agent has been living in the Parish throughout this period and all consultation communications have been delivered to his addresses in the Parish.
- 1.6.35 AR&V opened the Poplars 'Camping and Caravan Site' in July 2018. In October 2018 the Parish Council invited Lanpro to present their ideas for the site to the November Council Meeting. The consultants accepted the invitation but subsequently cancelled. A second invitation was issued to attend the December meeting and once again the initial acceptance was withdrawn with an offer to re-arrange in 2019. At the time of writing the presentation has not taken place although AR&Vs agent (Mr S. Lucas) has attended Parish Council meetings when the NDP was discussed.
- 1.6.36 At no time has any suggestion come forward to either the Parish Council or the Borough Council that this site should be allocated for development. It is thus unreasonable to suggest that the NDP has failed to consult or engage with the owners or their agents and to consider their site as a reasonable alternative to the preferred housing allocation site.

#### **Other points**

- 1.6.37 It is suggested that the NDP evidence base identified the problems facing the Parish as '*a high proportion of second homes, low occupancy rates with first homes, lack of employment opportunities, a resulting lack of local spend and services and a large economically inactive ageing population*'. Lack of employment opportunities, a resulting lack of spend and a large, economically inactive, ageing population are not identified as problems for Holme. The economy report highlights self employment and year round income/spend from retirement pensions as an extremely important contribution to the local economy.
- 1.6.38 All of the land use opportunities identified in Part A paragraph 3.8.2 of the NDP have been explored in the various evidence reports. All, with the exception of new public car parking are reflected in the proposed NDP policies. Nevertheless, there is a traffic and car parking policy.
- 1.6.39 Part D of the plan presents large scale maps and graphics suitable for detailed use (Part A, Section 1.4.2). The colours are heavily influenced by the OS source documents. They are quite clear on these large scale drawings.
- 1.6.40 The housing proposed for Holme reflects local preferences and is typical of that occupied by downsizers and young families.
- 1.6.41 No explanation or evidence is provided to support the contention that Policy HNTS5 (The Countryside Zone) conflicts with the guidance in paras 78 and 79 of the NPPF. This proposition has been examined and no conflict can be identified.

#### **Conclusion**

- 1.6.42 With respect to the penultimate paragraph of these objections it is concluded there is no evidence the NDP does not respond appropriately to local need; that reasonable alternatives have not been considered; that the plan is not deliverable and that it is not consistent with the Local and National Policy Frameworks.

## 30 APPENDIX 23: RESPONSE TO CRUSO & WILKIN (FOR G. RENAUT)

### 1.1 Introduction

- 1.1.1 Cruso and Wilkin on behalf of Mr G. Renaut (owner of the Eastgate Barn site) “support the proposed housing allocation under Policy HNTS 13B” but “are concerned that Policy HNTS 16 (which restricts occupancy of any new or replacement housing to principal residences only) will result in an unviable form of development across the village”. As a result they object to the Draft NDP in its current form.
- 1.1.2 It is suggested “there is an insufficient evidence base on which to justify...” inter alia, ...“Policy HNTS 16 insomuch as a clear and compelling case, backed by thorough and conclusive evidence, has not been made for planning policy intervention”.
- 1.1.3 It should be noted that Mr Renaut’s own response to the Regulation 14 Consultation was very positive and supported all policies with the exception of (HNTS 9) which was neutral.

### 1.2 Policy HNTS 16 Principal Homes

- 1.2.1 Concerns are also raised “that any principal residency restriction which may be imposed would make existing housing stock within the village finite (insomuch as there will be no further available unrestricted housing available) which will inevitably increase in price” and that “Intervention would set a precedent for similar restrictions across the Norfolk coast which would have a damaging impact on the local economic, social and environmental well-being of the area”.
- 1.2.2 It is contended that the rise in numbers of second homes is part of a national trend and that Holme’s attractive location and popularity as a tourist destination means that it is to be expected and is not unusual in this respect.
- 1.2.3 It is claimed that “These factors do not though justify planning policies being utilised to restrict housing development - such policies require exceptional justification and we do not consider that this has been proven (or could even be proven)”.
- 1.2.4 It is further suggested that if the Principal Homes Policy were dropped the acknowledged problem of replacing small houses with much larger ones could be dealt with by imposing a size restriction on replacement dwellings elsewhere in the plan.
- 1.2.5 It is suggested that the Policy is not justified by the evidence base and “The reason for this proposed policy is evidently a concern over social cohesion but there is no firm evidence of this other than circumstantial opinion”.
- 1.2.6 The Policy is not supported by a local housing needs survey and does not explicitly require residence by ‘local people’.
- 1.2.7 There is no evidence of loss of services in the Parish and there is no way of demonstrating compliance with the Policy because there is no doctor, dentist or school in the village.
- 1.2.8 The SEA screening report did not consider alternatives – specifically the likely effects of a ‘policy off’ scenario’.

### **1.3 Policy HNTS 13 B – Site Allocation at Eastgate Barn**

- 1.3.1 The representation supports the allocation “*of the land (Eastgate Barn) for 5 new dwellings*”. However it is suggested that the GIA should be amended from 80-120m<sup>2</sup> to 80 – 150m<sup>2</sup> for consistency with HNTS 13 A New Dwellings.
- 1.3.2 It presents data suggesting that the traffic impacts would be acceptable.
- 1.3.3 Despite support it is suggested that inclusion of Policy HNTS 16 (Principal Homes) would make the development ‘unviable’. A development appraisal is presented in an Appendix in support of this claim.

### **1.4 Failure to comply with basic conditions**

- 1.4.1 The representation reviews the basic conditions and suggests that in its current form the NDP would fail to meet these.
- 1.4.2 It is agreed that a Neighbourhood Plan is appropriate for the Parish but it is suggested that some of the policies are unnecessary because they “*either repeat other development plan policies or are not backed by sufficient evidence to be appropriate: in particular draft Policy HNTS 16*”.
- 1.4.3 It is argued that the NDP does not deliver sustainable development and that “*The evidence base requires on the whole significant amendments being made to seek to justify the Draft NP: some of it should be deleted given the lack of evidence available. The amount of mobile accommodation requires further review as different figures appear in the documents and this effects relative figures within the documents*”.

The argument for failure to deliver sustainable development is supported by a table indicating which NPPF policies are believed to be relevant in failure to deliver sustainable development. Clarification is sought on which LDF Policies the NDP takes to be strategic and it is claimed that “*The Draft NP does not conform to Core Strategy Policy CS10 in respect of new tourist accommodation as it adopts an unnecessarily restrictive position*”. Further “*No strategic policies restrict occupation to principal residencies only and so Policy HNTS 16 does not conform*”.

- 1.4.4 The objection concludes by stating that should Policy 16 (Principal Homes) remain it will impact on the viability of the proposed housing allocation.

### **1.5 Response to the Cruso and Wilkin objections**

- 1.5.1 For clarity of response, the representations raised will be considered in the following order:
- Alleged inaccuracy of the evidence base and unjustified interpretation of its content
  - Failure to meet the Basic Conditions
  - Lack of Justification for Policy HNTS 16 (Principal Homes)
  - Viability of Policy HNTS 13 B (Site Allocation)



***Alleged inaccuracy of the evidence base and unjustified interpretation of its content***

- 1.5.2 The representations contains a detailed commentary covering Parts A and B of the Plan and the NDP evidence reports on the Parish Economy, the Socio-Economic Profile and the Housing Report. It comments on the SEA Screening Report and the Water Quality Report. It makes no reference to the Consultation Report, the Environmental Designations Report, The Environment, Landscape and Biodiversity Report, or the Heritage Report.
- 1.5.3 It contends that the NDP reports contain errors of fact but offers no evidence based proposals for corrections. The commentary frequently expresses disagreement or offers an opinion but provides no hard evidence for the alternative views expressed.
- 1.5.4 The NDP evidence reports, are based largely on independent data sources including Official Statistics and government/local authority publications supplemented by empirical local data collection where necessary (see Part A, Section 1.3.2). They provide a balanced picture of the situation in the Parish. Many of the comments on these reports however, are highly selective in choosing material which supports the objections but fails to consider comments that present a different or opposing view and which are important to reaching a balanced conclusion. This undermines much of the case presented.
- 1.5.5 Failure to address (or even mention) the Environment and Heritage considerations relevant to achieving sustainable development raises serious doubts about most of the judgements made and the conclusions presented in the objection. Sustainable development is about balancing Social, Environmental and Economic considerations. NPPF 8 is clear that these considerations are *“Interdependent and need to be pursued in mutually supportive ways”*.
- 1.5.6 Against the background evidenced by the Socio-Economic Profile Report and the findings of the NDP questionnaire survey the dismissive attitude to community considerations leaves much to be desired. The NDP evidence reports have never suggested that there is a lack of ‘Social Cohesion’ in the Parish. Indeed the opposite is true but the falling number of residents means that the current direction of travel, without intervention, will result in a situation where there is not enough residents to maintain important community facilities and events - the Church, the Village Hall, Open Gardens and the many fetes, fairs and gatherings that are central to life in a small village.

***Failure to meet the Basic Conditions***

- 1.5.7 On the basis of their review of the evidence base Cruso and Wilkin suggest that the NDP does not meet basic conditions.
- 1.5.8 The contention that policies repeat other development plan policies is incorrect. All of the policies in the NDP have a specific local dimension. The comment that they are not backed by sufficient evidence to be appropriate has been dealt with above.
- 1.5.9 The suggestion that the evidence base on the whole requires significant amendment in order to justify the draft NDP or that parts should be deleted is not supported by any evidence offered in the representation. The amount of mobile accommodation in Holme based on the evidence from current aerial photography (130-140 units) is clearly set out in paragraph 11.2.5 of Policy HNTS 9 (Touring and Permanent Holiday Accommodation). The

figures quoted in the Socio-Economic Profile Report (202 Household Spaces) are taken directly from the Census and an explanation of these is provided on pages 11-12.

- 1.5.10 It is noted that a similar misunderstanding surrounding the Census figures for mobile accommodation arises in the two other developer objections. None of the mobile accommodation or caravan sites in Holme are residential. This holiday accommodation, all of which is subject to occupancy conditions which generally prevent use during the winter months.
- 1.5.11 *De facto*, basic misunderstandings about Holme's status as an SVAH in the Settlement hierarchy, the drivers of the local economy (natural capital and ecosystem services), the existing (baseline) imbalance between social, economic and environmental dimensions of sustainable development (which has to be the starting point for any plan) and failure to engage with environmental considerations (eg no acknowledgement of AONB considerations) raises doubts about the soundness of the non-conformity summary presented in relation to basic conditions.
- 1.5.12 The NDP provides a comprehensive Basic Conditions Statement that takes account of all the relevant evidence in order to demonstrate compliance.

***Justification for Policy HNTS 16 (Principal Homes)***

- 1.5.13 Concerns that the existing housing stock will suffer a (differential?) price increase as a result of this Policy are theoretical and not evidence based. Furthermore, the number of Principal Homes will represent a very small percentage of the housing stock (considerably less than 10%) and cannot therefore be expected to have much impact on remaining property prices. The very strong external market is likely to be a much greater determining factor which is one of the reasons for having the Policy in the first place.
- 1.5.14 The precedent for a Principal Homes policy has already been established in West Norfolk.
- 1.5.15 The St Ives ruling on Principal Homes dismissed the case against such policies and established principles for their use in Neighbourhood Plans. This, and the fact that growth in second homes is part of a national trend underpins the reason why many communities up and down the country are now seeking to protect themselves by following the St Ives example. Planning intervention is an obvious route forward for addressing this problem.
- 1.5.16 The situation in Holme is exceptional. The population declined by almost one third between 2001 and 2011 despite an above average growth in the housing stock and at the time of the 2011 Census the proportion of principal homes in the Parish had declined to around 45%. In the same period in St Ives population was still growing (albeit at less than 3%) and principal home ownership stood at c 70%.
- 1.5.17 The main argument for the policy in St Ives was essentially the same as in Holme – ie negative social impacts. However these impacts have a knock on effect on the economy by limiting the number of people who have the opportunity to live and therefore to work in the area. In Holme the Economy report identifies the key issues and economic drivers. For example, it notes that retired people and their pensions are a key driver lending year round stability to the economy. Failure to recognise the needs of this element of the community (ie downsizers and in-moving retirees) will result in economic damage which the principal homes policy will help to rectify. Ensuring the needs of these groups are met contributes to

sustainable development and the St Ives ruling recognised that contributing to sustainable development is in the national economic interest.

- 1.5.18 The purpose of the Policy is to increase the residential element of Holme's population. The Policy does not restrict occupancy to local people
- 1.5.19 In response to the objection, the economic justification for the Policy will be strengthened in the supporting text to the policy.
- 1.5.20 In response to comments suggesting imposing a size restriction on replacement dwellings this is already dealt with by HNTS 14 (Replacement Dwellings).
- 1.5.21 The evidence shows that the decline in Holme's resident population is unquestionably substantial. It makes little sense to talk about the decline in services in a community that doesn't have any and furthermore, the NDP questionnaire survey revealed that the majority of respondents would prefer to continue depending on Hunstanton and the neighbouring, larger villages for services. This view is consistent with LDF Settlement Hierarchy policy and the desire to strengthen the year round economy in Hunstanton.
- 1.5.22 Compliance with the Policy could be demonstrated by registration with the Doctors, Dentists and schools in the neighbouring larger settlements such as Hunstanton, Docking and Burnham Market.
- 1.5.23 With regard to the SEA screening report the St Ives ruling concluded that only reasonable, realistic and relevant alternatives need to be considered in SA and SEA exercises. Furthermore, evaluation is a matter for the decision making authority. A reasonable alternative has to be one that will achieve the Plan's policy objectives and therefore 'Policy off' would not be considered a reasonable alternative in this case.
- 1.5.24 Ignoring Holme's status as a Smaller Village and Hamlet, more market housing might represent a reasonable alternative following the principle that some would be occupied by principal residents. However, there is no guarantee that this would not simply continue to result in more second homes. Furthermore, the St Ives judgement recognised that a reasonable alternative would have to be environmentally equal to the preferred option and given Holme's environmental status, this alternative would be a non starter and would not need to be considered.
- 1.5.25 Based on the above it is concluded that there is no case for removing the Principal Homes Policy.

***Viability of Policy HNTS 13 B (Site Allocation)***

- 1.5.26 Although the representation suggests that the upper limit of GIA for the five new dwellings at Eastgate Barn should be increased to 150 m<sup>2</sup> (to be consistent with the range quoted for all new dwellings) the limit of 120m<sup>2</sup> is consistent with the size of smaller market housing being offered elsewhere along the coast and reflects the strong preferences of the community to have some small homes in the village. NO case is made for the proposed increase.
- 1.5.27 The contention that the Principal Homes Policy is unviable is justified by figures presented in the supporting development appraisal which compare profitability of the development based on five principal homes versus only one principal home in the scheme. This indicates

that the 'value' of the principal homes would be depressed by more than 40% as a result of the policy. However, no evidence or justification is offered to support this figure. Of greater significance all of the costs associated with the two alternatives are identical. Some of these are significant – eg the land cost of (£453,000), agents/professional fees (£30,000) and construction financing (£33,000). The costs for both alternatives already appear high but in reality costs such as the land costs would have to be adjusted to reflect differences in the market value.

- 1.5.28 These figures are not credible. Even if they were, more imaginative approaches to the development could be considered. The arguments regarding viability are therefore not accepted.

## 31 APPENDIX 24: OCEAN BREAKS (ABBEY GROUP) REPRESENTATION



**The Abbey Group Cambridgeshire Limited**

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2<sup>nd</sup> August 2019

Dear Ms Jones

### **Objection to Holme-next-the-Sea Neighbourhood Plan 2016-36**

On behalf of The Abbey Group Cambridgeshire Limited ("Abbey") please find below our comments and, where relevant, objections to the Draft Holme-next-the-Sea Neighbourhood Plan 2016-36 ("the DNP"). Abbey own existing buildings and land in the village some of the dwellings are occupied as holiday lets under the name of Ocean Breaks.

We consider each of the documents of the DNP in turn below.

#### **Holme-next-the-Sea Neighbourhood Plan 2016-36 Part A: Introduction to the Plan and Background to the Parish**

The DNP does not list out the strategic policies of the Development Plan and it is therefore not possible to consider conformity of the DNP against any adopted planning policies. This should be clarified and the relevant policies clearly listed.

##### *Paragraph 1.2.4*

The Borough Council's Core Strategy covers the period up to 2026. Whilst we note the aspiration of the forthcoming Local Plan to cover the period to 2036 that Plan is at a very early stage and there is no certainty that the plan will end up covering that period of time. Given that Neighbourhood Plans are allowed for via separate legislation it is not appropriate to allow for the DNP to cover the period to 2036 due to the potential incorporation of provisions for Neighbourhood Plans within the new Local Plan. It is also possible that strategic policies may change which would render the DNP being inconsistent with the Local Plan.

We can therefore see no valid reason to extend the time period for which the Neighbourhood Plan covers further than 2026.

##### *Paragraph 2.4.15*

The language within this paragraph is inappropriate. It is not for the planning system to prevent inward investment within the parish and in any event tourist uses are supported by Core Strategy Policy CS10.

*Paragraph 2.4.16*

The precautionary approach which is advocated here is inconsistent with Core Strategy Policy CS10. This approach is also not supported by paragraph 83 of the National Planning Policy Framework (NPPF) which provides support for appropriate tourist related rural development. A more positive approach should be adopted to such uses particularly as: there is no evidence that further tourist related uses are not required; and given that the DNP assumes that there are 202 mobile homes within the village when in fact the correct figure is around 130. Additional provision could therefore be made without impacting upon the perceived existing figure of 202 mobile homes.

**Holme-next-the-Sea Neighbourhood Plan 2016-36 Part B: The Policies**

*Policy HNTS 8: Sustainable Travel and Tourism*

The tourism section of the policy is named 'Recreational Facilities' and we would suggest renaming this 'Tourism'. However the policy itself does not deliver any new facilities and there is no evidence to suggest that new facilities are not needed. The DNP is therefore in direct conflict with Core Strategy Policy CS10.

*Policy HNTS 9: Touring and Permanent Holiday Accommodation*

The third paragraph of the policy is negatively worded and there is no evidence to show that additional accommodation is not required – in fact DNP Policy HNTS 6 supports new tourism uses which could include additional accommodation. The policy is in conflict with Core Strategy Policy CS10 and NPPF paragraph 83.

*Paragraph 11.2.6*

We question whether the mobile accommodation can in fact accommodate the volume of people suggested. This may though create a qualitative need for smaller scale tourist accommodation of say 2 bedrooms (for up to 3-4 people).

*Paragraph 11.2.8*

We consider that all four bullet points to be inaccurate as follows:

In relation to travel to adjacent settlements the village is within a rural location and it is to be expected that car journeys may be required: this does not create a greater than average trip generation as such trips are commensurate with those of other residents in the village. In any event the village benefits from existing facilities and also has a good bus service.

It does not follow that any surplus of accommodation within Heacham or Hunstanton means that such accommodation would not be sought after in Holme. The tourist facilities within Heacham and Hunstanton are different to those in Holme.

Not qualifying to pay CIL is not in our view a reason to not provide further accommodation.

Any impacts arising from visitor pressure are unlikely to be significant and mitigation can be secured if required. Such mitigation will inevitably assist wider objectives. Doing nothing will require public money to be used to deliver the necessary mitigation and we therefore question the deliverability in that scenario.

## **Holme-next-the-Sea Neighbourhood Plan 2016-36: The Parish Economy**

### *Paragraph 6.2.4*

This paragraph should be deleted and replaced with reference to Core Strategy Policy CS10 which supports sustainable tourist related development including new accommodation.

### **Request for an Oral Hearing when the Neighbourhood Plan is examined**

Paragraph 057 Reference ID: 41-057-20140306 requires that we make a case for an oral hearing through our submissions to the DNP. This letter forms that case relative to this Regulation 14 consultation and it will be clear that we consider that an oral hearing is essential in this case given the position that the DNP is proposing to adopt which is inconsistent with strategic policies and the NPPF.

### **Compliance with the Basic Conditions**

We note that no draft basic conditions statement has been prepared to date and so our comments below may require revision/addition to reflect that once it has been produced.

Overall we consider that the DNP does not satisfy the basic conditions test for the reasons set out above and attached and as summarised below:

#### *1) Is it appropriate to make the DNP*

On balance we consider that it is appropriate to make the DNP albeit some of the policies within the plan are inconsistent with the Core Strategy and the NPPF and so substantial amendments are required.

#### *2) Does the DNP contribute to the achievement of sustainable development*

We do not consider that the DNP satisfies this requirement as drafted but that it would be capable of being amended such that it could do. In particular our comments above require revision to the DNP such that it can be considered to be consistent with the Core Strategy and the NPPF.

#### *3) Is the DNP in general conformity with the strategic policies within the development plan?*

We assume that the Core Strategy policies are those which the DNP considers to be the strategic policies: this should be clarified. The DNP does not conform to Policy CS10 in respect of new tourist accommodation as it adopts an unnecessarily restrictive position. General conformity has not been demonstrated.

#### *4) Does the DNP breach EU obligations*

We have not found any conflicts in this regard.

### **Suggested Amendments to the DNP**

We consider that our observations above should be considered and the DNP revised accordingly.

### **Conclusion**

We consider that the DNP fails to satisfy the basic conditions required for it to be adopted. We therefore wish to register our objection to the DNP and would request being kept up to date with the next and following drafts of the plan. My email address is: [abrand@taguk.co.uk](mailto:abrand@taguk.co.uk).

Yours Faithfully

*A. Brand*

Andy Brand BSc (Hons) MA MRTPI  
Planning Director

## 32 APPENDIX 25: LANPRO (FOR AR&V INVESTMENTS) REPRESENTATION

Date: 31<sup>st</sup> July 2019

Our ref: 1048

Ms C Jones

NDP Project Co-ordinator

27B Homefields Road

Hunstanton

Norfolk

PE36 5HL

Dear Christina,

### **Re: Objection to Holme-next-the-Sea Neighbourhood Plan Pre-Submission Consultation**

My client AR&V Investments Ltd owns Inglenook and The Poplars camping, motor home and caravan sites and no. 42 Main Road and wish to make the following objections to the emerging Neighbourhood Plan (NP).

My client supports the wording of paragraph 3.8.2 within Part A entitled *Introduction and Background* that identifies the various opportunities that could be promoted and delivered through the emerging NP. My client is however disappointed that many of the opportunities listed have not actually been explored through the NP preparation process. My client would like the NP to explore further the opportunities relating to building a stronger community by investigating available sites for new homes to better balance the community and improve community facilities.

My client contends that although the NP correctly identifies the problems the village is currently experiencing (resulting from a high proportion of second homes, low occupancy rates with first homes, lack of employment opportunities, a resulting lack of local spend and services and a large economically inactive ageing population) it does nothing to address any of these problems.



The NP as currently drafted doesn't properly examine the reasonable alternatives based on all the evidence collected. My client contends that the NP is a somewhat of a missed opportunity and fails to accord with Government guidance contained in paragraph 16 of the National Planning Policy Framework 2019 (NPPF). This is because the emerging NP is:

- Not positively prepared;
- Does not deliver sustainable development of the type required to address the villages problems;
- Is not aspirational enough;
- Has not engaged with my clients to-date as owners of the caravan, motor homes and camping sites in the village to-date in arriving at the strategy advocated;
- Does not seek to support my clients camping, caravan and motor homes site uses going forwards; and
- Seeks to duplicate and unreasonably reinforce existing legislation.

Part B of the NP in paragraph 1.3 under *O7: New and Replacement Dwellings* confirms that the starting point for the NP is to ensure that suitable policies are prepared to enable infill development to be accommodated that respects its surroundings. This is a credible development strategy to meet local housing needs and improve community facilities. Nevertheless, it is clear from looking at the Plan Zones (PZ) and Village Inset Map (VIM) drawings on pages B-7 and B-8 respectively that the Development Envelope (DE) is drawn overly tight to deliberately restrict organic and infill growth within the village. The DE does not reflect the actual village boundary nor the true extent of built development and previously developed sites in the village and this should be corrected to allow the infilling objective to be met.

The DE as currently drawn excludes the vast majority of windfall sites within and on the edge of the village regardless of the actual potential for landscape, heritage and townscape impacts. My client contends that a better approach that is more aligned to paragraph 68 of the NPPF would be to include the existing caravan, motor home and camping sites known as Inglenook and The Poplars that are owned by my client within this boundary to allow sensitive infilling to address the imbalance in housing stock within the village. The part or wholesale re-development of these sites, including the replacement of the static caravans, could lead to a wider landscape improvement.

My client also objects to Policy HNTS2 entitled Holme Village Zone as drafted. Firstly, because the colours used on the PZ drawing are not clear (and are confusing); and secondly because my client's sites known as Inglenook and The Poplars are excluded. The wording and related PZ drawing needs to reflect the fact that there are small appropriate employment and leisure related development sites within the village that represent opportunities to meet local housing needs in addition to the gaps between or adjacent existing dwellings. As such the Policy should be re-worded accordingly to reflect this further opportunity to improve the social vitality of the village.

My client contends that the NP cannot correct the identified “imbalance in the resident population and housing stock” outlined as an objective on page B-11 without creating additional new housing opportunities at a variety of scales, types and levels of affordability.

It is clear from the wording of Policy HNTS13B (and related Policy HNTS13A relating to the overly restrictive development envelope) that the NP will actually deliver no more than a modest number of high value second home and/or retirement accommodation for downsizers moving into the area. The NP fails to use the evidence base correctly and then devise a strategy to meet an existing need from households already resident in the village and living in the wrong kind of mobile and temporary accommodation. The housing strategy advocated in the NP is to restrict the size of homes to a level where they are not suitable as family accommodation to re-balance the housing stock and then restrict supply to a level where the cost of new homes is artificially inflated still further due to unmet demand.

The current demand for housing and restriction on the supply of new homes has created an unusual situation in the village. It is recognised by all involved in the NP process that there is an unusually high amount of mobile and static caravans and other types of temporary accommodation that are being used as permanent affordable housing within the village (some 202 homes of this type against 477 homes overall). This is due to the high demand for second homes within the village, high and rising house prices due to problems with demand and supply, local residents wanting to remain in the village and this type of mobile accommodation being the only genuine form of affordable housing accessible to people in the area.

The NP in recognising this unique situation (see page 12 of Part E document entitled *Socio-Economic Profile of the Neighbourhood Area* and the table entitled Types of accommodation) and the NP must seek to create a positive planning framework to allow the replacement of these non-standard dwellings with more permanent ones (subject to wider landscape impact and design) to meet local needs. The majority of these temporary dwellings are located within or on the edge of the village on land that is genuinely deliverable for this use. This joined-up approach would address the area wide assessed need for better and more sustainable forms of affordable accommodation.

My client further objects to the wording of Policy HNTS5 entitled *Countryside Zone* as it is contrary to the aims and objectives of Government guidance contained in paragraph 78 and 79 of the NPPF.

My client as owners and operators of the Inglenook and The Poplars camping, motor home and caravan sites objects to the wording of Policy HNTS9 entitled *Touring and Permanent Holiday Accommodation*. This is because the emerging Policy seeks to prevent the intensification and/or

expansion of existing sites regardless of need, environmental benefits/impacts and landscape capacity/impact or the planning, housing need and/or socio-economic merits of any proposal.

My client is concerned that its established rural business that has paid business rates to the Council for a considerable period of time and provides spend (and secondary spend) to the village will be harmed by the emerging Policy and NP if adopted. The further references to "...Where accommodation, pitches or facilities are removed or relocated on the site, the area affected must be fully restored to a standard consistent with the surrounding natural landscape. Where the active operation of a site ceases any existing use rights will be relinquished." are also wrong, misleading, contrary to the planning permissions granted and/or lawful uses, and further seek to duplicate other UK legislation and established case law and should the emerging Policy be deleted. Furthermore, given the total amount of touring and static caravans present within the village the emerging Policy is neither justified, effective and/or reasonable.

My client would therefore argue that this emerging Policy is un-sound and it is reflective of the shortcomings of the NP throughout. The NP fails throughout to recognise the contribution that static and touring caravans and camping makes to the character and economy of the village. This land use is part of the landscape, historic, socio-economic, employment, housing, affordable housing and spatial character of the village and these existing sites present an excellent opportunity to deliver more sustainable patterns of development that to-date has not been explored within the NP.

My client therefore objects to the NP on the basis that the Pre-Submission Consultation NP is not sound and doesn't pass the tests of soundness as outlined in paragraph 35 of the NPPF. The NP as currently drafted isn't positively prepared, contains an inferior and exclusive development strategy that does not meet the true needs of the village and is not consistent with the aims and objectives of Government guidance contained in the NPPF. Therefore, my client would like to attend the forthcoming EIP as an objector to the NP and present evidence to demonstrate that the tests of soundness are not met.

I trust that the representations contained within this letter are made correctly and the NP will be amended accordingly in advance of submission.

Yours sincerely,

Philip Atkinson

Director

### 33 APPENDIX 26: CRUSO & WILKIN (FOR G. RENAUT) REPRESENTATION

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Our Ref: APC/469/35

7 August 2019

Christina Jones  
NDP Project Co-ordinator

Sent via email only to: [ndp@holmentspc.org](mailto:ndp@holmentspc.org)

Dear Ms Jones

#### Objection to Holme-next-the-Sea Neighbourhood Plan 2016-36

On behalf of Mr G Renaut please find below our comments and, where relevant, objections to the Draft Holme-next-the-Sea Neighbourhood Plan 2016-36 ("the Draft NP"). Mr G Renaut is the landowner of the proposed housing allocation within the Draft NP (HNTS 13 B).

Our response is appended to this letter and references both the Draft NP and its evidence base.

As will be seen from our response we have severe reservations regarding the Draft NP and whilst we support the proposed housing allocation under Policy HNTS 13 B we are concerned that Policy HNTS 16 (which restricts occupancy of any new or replacement housing to principal residences only) will result in an unviable form of development across the village. **Overall therefore we object to the Draft NP being made in its current form.**

In particular we are very concerned that there is an insufficient evidence base on which to justify Policy HNTS 16 inasmuch as a clear and compelling case, backed by thorough and conclusive evidence, has not been made for planning policy intervention.

We note that reference has been made to the St Ives Neighbourhood Plan in Cornwall which was adopted in December 2016 following a High Court Case<sup>1</sup>. That case confirmed that exceptional justification would be required to justify applying a principal residence restriction<sup>2</sup>.

As would be expected with any Neighbourhood Plan the situation in St Ives was materially different to that of Holme-next-the-Sea: some important considerations are set out below:

- The principal residency restriction in St Ives was based upon social and economic considerations (two of the cornerstones of sustainable development for the purposes of planning policies)<sup>3</sup> whereas the restriction for Holme-next-the-Sea relates to social considerations only<sup>4</sup>;

<sup>1</sup> (RLT Built Environment Limited) v The Cornwall Council and St Ives Town Council 2016

<sup>2</sup> (RLT Built Environment Limited) v The Cornwall Council and St Ives Town Council 2016 Paragraph 14

<sup>3</sup> Independent Examiners Report on the St Ives Neighbourhood Development Plan Page 30 (undated)

<sup>4</sup> Holme-next-the-Sea Neighbourhood Plan 2016-2036: The Parish Economy Evidence Base: Research Report (Updated April 2018) Paragraph 3.2.1

- St Ives had an existing population of over 11,000 as was due to see significant housing growth (1,100 new homes over the plan period) whereas Holme-next-the-Sea is a small village with a population of 239<sup>5</sup> and an existing housing stock of 477<sup>6</sup> with only 1 housing allocation for 5 new homes in the Draft NP (Policy HNTS 13 B);
- St Ives has a town centre (comprising 212 commercial units in 2009) and a Tesco foodstore comprising 16,000m<sup>2</sup> of retail floorspace. The town centre was experiencing increased vacancy rates<sup>7</sup>. Holme-next-the-Sea has no comparable facilities.

The adopted St Ives Neighbourhood Plan is therefore not comparable to the Draft NP for Holme-next-the-Sea as it related to a different type of settlement and different circumstances.

We also have concerns that any principal residency restriction which may be imposed would make existing housing stock within the village finite (insomuch as there will be no further available unrestricted housing available) which will inevitably increase in price.

We do not dispute that Holme-next-the-Sea is a unique village but the situation that it faces with regard to second home ownership and holiday lets is not an uncommon one along the Norfolk coast or more widely throughout the United Kingdom. In our view the circumstances regarding second home ownership within the village are part of a national trend with evidence from the Resolution Foundation<sup>8</sup> confirming that between 2000-02 and 2012-14 there has been a 30% increase in the proportion of adults who own second homes in Great Britain: this equates to 1 in 10 adults.

It is accepted that the addition of dwellings purchased for occupation as holiday lets has added to the concern but this is a result of the location of the village and its attractive setting. Again this is not an uncommon occurrence in a location which attracts tourists.

These factors do not though justify planning policies being utilised to restrict housing development – such policies require exceptional justification and we do not consider that this has been proven (or could even be proven). The village remains a vibrant location and it continues to fulfil an important role within the Borough. Intervention would set a precedent for similar restrictions across the Norfolk coast which would have a damaging impact on the local economic, social and environmental well-being of the area.

We note that concerns are raised regarding the replacement of existing bungalows with larger housing and we consider that this is best dealt with by the Draft NP Policy HNTS 13 A and/or a new policy restricting the size (in percentage terms relative to the existing dwelling) of replacement dwellings. This would be a legitimate way in which planning policy could intervene.

We have made a number of other comments (see attached) but our main comments relate to Draft NP Policies HNTS 13 B and HNTS 16.

### **Policy HNTS 16**

In respect of HNTS 16 we do not consider that this policy is justified by the evidence contained with the Draft NP or its associated evidence base. The reason for this proposed policy is evidently a concern over social cohesion but there is no firm evidence of this other than circumstantial opinion.

<sup>5</sup> Holme-next-the-Sea Neighbourhood Plan 2016-2036: Socio-Economic Profile of the Neighbourhood Area – Evidence Base: Research Report 1 (September 2016) Page 4

<sup>6</sup> Holme-next-the-Sea Neighbourhood Plan 2016-2036: Socio-Economic Profile of the Neighbourhood Area – Evidence Base: Research Report 1 (September 2016) Page 11 – albeit we consider this figure is inflated by at least 60 mobile homes which are not within the Draft NP boundary

<sup>7</sup> St Ives Area NDP: Evidence Base Paragraphs 4.66, 4.75 and 4.78 (March 2015)

<sup>8</sup> 21st Century Britain has seen a 30 per cent increase in second home ownership (August 2017)

Whilst the policy is not worded to allow occupation by local residents/families there is in any event no local housing need survey or report to demonstrate if such a need exists.

In terms of other social considerations there has been no reduction in services and facilities and in fact it is reported in the evidence base that the local public house is kept open over the quiet winter months<sup>9</sup> by existing residents (including second homeowners).

We also have concerns regarding the ability to comply with the restriction given that the policy states that evidence of principal occupation will be required that the registration on the local Register or Electors will not alone be sufficient. Given that lack of a school, dentist or doctor within the village it is difficult to see what further evidence could be provided to prove principal occupation.

Overall we consider that this policy does not satisfy the basic conditions test – further comments in this regard are provided below. We also consider that an alternative ‘policy off’ scenario should be tested within the screening report of the requirements for a Strategic Environmental Assessment (undertaken by the Local Planning Authority) so that the impacts of not applying this policy within the Draft NP can be considered. Our view is that the ‘policy off’ approach would result in very similar effects given the lack of any conclusive evidence that a principal residence restriction is in fact necessary.

### **Policy HNTS 13 B**

Turning to consider Policy HNTS 13 B we do support the allocation of the land (Eastgate Barn) for 5 new dwellings. We consider that the minimum floorspace figures should be amended to reflect the 80-150m<sup>2</sup> figure used in part A of Policy HNTS 13.

The development would not lead to any significant highway impacts given the amount of development proposed. The scale of the development is well below that which normal requires a Transport Statement to be submitted in support of a planning application (such Statements are usually required for developments of 10 or more dwellings).

The site has an existing vehicular access which serves the existing building and the landowners wider agricultural land holding and sufficient forward visibility is available at the access. We are not aware of any accidents occurring at the access or nearby. The existing access is used for agricultural activity and although traffic movements vary across the year the site would typically accommodate the following vehicular movements:

- i) Cars/Vans: 28 per day
- ii) Lorries: 8 per year (at harvest time)
- iii) Agricultural vehicles: 8 per day

The access is also used during shooting season (12 days per annum minimum) and on each event there would be 40 vehicular movements per day.

The proposed level of movements, according to the industry standard (TRICS 7.5.1), would be as shown in the table below:

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<sup>9</sup> Holme-next-the-Sea Neighbourhood Plan 2016-2036: The Parish Economy Evidence Base: Research Report (Updated April 2018) Paragraph 4.2.1

**Residential Trip Rate / Trips (5 Dwellings)**

Time Period	TRICS Person Trip Rate / Dwelling			Person Trips (16 Dwellings)		
	Arrival	Departure	Two-Way	Arrival	Departure	Two-Way
08:00 – 09:00	0.209	0.762	0.971	1	4	5
17:00 – 18:00	0.603	0.28	0.883	3	1	4
07:00 - 19:00	3.953	4.104	8.057	20	21	41

The level of movements overall would be comparable with the daily movements to and from the site. The development would not therefore lead to any unacceptable highway safety considerations nor any adverse impact upon the free flow of vehicles in the local area.

Other than the comments above we find the policy acceptable but should policy HNTS 16 be made then we consider that the development of the site for 5 new homes would be unviable. We have included a viability appraisal at **Appendix One** which shows that the redevelopment of the site would not be viable should all 5 homes have the principal restriction in terms of occupancy. The scheme would be viable should 1 of the 5 homes have the restriction.

**Request for an Oral Hearing when the Neighbourhood Plan is examined**

Paragraph 057 Reference ID: 41-057-20140306 requires that we make a case for an oral hearing through our submissions to the Draft NP. This letter forms that case relative to this Regulation 14 consultation and it will be clear that we consider that an oral hearing is essential in this case given, *inter alia*, the position that the Draft NP is proposing to adopt in respect of unnecessary restricting the occupation of housing. I would expect a planning consultant to be present on our behalf at a hearing.

**Compliance with the Basic Conditions**

We note that no draft basic conditions statement has been prepared to date and so our comments below may require revision/addition to reflect that once it has been produced.

Overall we consider that the Draft NP does not satisfy the basic conditions test for the reasons set out above and attached and as summarised below:

*1) Is it appropriate to make the Draft NP*

On balance we consider that it is appropriate to make the Draft NP in order to deliver additional housing development within the village in order to assist in contributing to the national housing crisis and to fulfil paragraph 59 of the National Planning Policy Framework (NPPF) together with assisting the vitality of the village as a whole.

Some of the policies within the plan are either unnecessary as they either repeat other development plan policies or are not backed by sufficient evidence to be appropriate: in particular draft Policy HNTS 16.

*2) Does the Draft NP contribute to the achievement of sustainable development?*

We do not consider that the Draft NP satisfies this requirement as drafted but that it would be capable of being amended such that it could do. There is insufficient evidence to support Policy HNTS 16 as despite the asserted social benefits which could arise from this policy there is no evidence to justify intervening in the housing market through the restriction of non-principal residence restrictions. We have explored this in detail above and commented upon the viability considerations that would be raised.

Other policies and supporting text of the Draft NP require revision to reflect the policies of the development plan, the NPPF and the evidence base (where this is justified). The evidence base requires on the whole significant amendments being made to seek to justify the Draft NP: some of it should be deleted given the lack of evidence available. The amount of mobile accommodation requires further review as different figures appear in the documents and this effects relative figures within the documents.

In respect of the NPPF the Draft NP fails to contribute towards the achievement of sustainable development as it is in conflict with the following:

NPPF Paragraph No.	Non-conformity Summary
7	The Draft NP does not contribute towards this owing to the over reliance upon social concerns. It does not weigh the economic benefits adequately.
8	There is no balancing mechanism within the Draft NP despite reference to net economic benefits arising from second home and holiday let accommodation.
11	The plan is unnecessarily restrictive and will not positively seek opportunities to meet the development needs of the area.
16	The Draft NP will not achieve sustainable development; is not positively prepared; includes policies which are ambiguous and does not serve a clear purpose.
29	The Draft NP would undermine the strategic policies of the development plan.
56	In relation to Policy HNTS 16 of the Draft NP the use of a Planning Obligation would not fulfil the legal tests as it is not necessary to make the development acceptable nor would it reasonably relate in scale and kind to the development.
59	The Draft NP would not significantly boost the supply of housing: in particular due to viability considerations arising from Policy HNTS 16.
80	The Draft NP does not give significant weight to the need to support economic growth both in terms of its inability to support new tourist accommodation and the weight which is given to the economic benefits arising from second homeowners and existing holiday accommodation.
81	See paragraph 80 comments above.
83	The Draft NP does not support such sustainable growth and expansion of all types of businesses nor sustainable rural tourism and leisure developments.
84	There is no recognition with the Draft NP that sites that are physically well-related to existing settlements should be encouraged for economic uses.
109	The 'severe' test is not reflected within the Draft NP.

3) *Is the Draft NP in general conformity with the strategic policies within the development plan?*

We assume that the Core Strategy policies are those which the Draft NP considers to be the strategic policies: this should be clarified. The Draft NP does not conform to Core Strategy Policy CS10 in respect of new tourist accommodation as it adopts an unnecessarily restrictive position.

No strategic policies restrict occupation to principal residencies only and so Policy HNTS 16 does not conform.



General conformity has not been demonstrated.

4) *Does the Draft NP breach EU obligations?*

We have not found any conflicts in this regard albeit there is an arguable case in respect of Human Rights given the proposed restrictions on principal residencies: this applies to new dwellings and particularly to replacement dwellings given that these are likely to be occupied with no restriction.

**Suggested Amendments to the Draft NP**

We have made a clear case above that Policy HNTS 16 should be removed from the plan in its entirety as the policy cannot be justified.

Should that policy remain in the Draft NP then this will impact the viability of the proposed housing development at Eastgate Barn (Policy HNTS 13 B). We have attached (see **Appendix One**) a viability appraisal which shows that the development would not be viable should all 5 new dwellings be principal residences. The development would be viable if 1 of those 5 dwellings had the restriction.

For information also a draft layout plan and elevation of the potential scheme for the development at Eastgate Barn is attached at **Appendix Two**.

**Conclusion**

We consider that the Draft NP fails to satisfy the basic conditions required for it to be adopted. Our main concern relates to Policy HNTS 16 which we consider to be unjustified. There are also instances where the evidence base lacks clarity and is based upon opinion rather than facts. We therefore wish to register our objection to the Draft NP and would request being kept up to date with the next and following drafts of the plan. My email address is: [apc@crusowilkin.co.uk](mailto:apc@crusowilkin.co.uk).

Yours Sincerely



**Adam Case**  
**Cruso & Wilkin**

**Holme-next-the-Sea Neighbourhood Plan 2016-36 Part A: Introduction to the Plan and Background to the Parish**

Before considering each matter we have observed that the Draft NP does not list out the strategic policies of the Adopted Development Plan and it is therefore not possible to anchor the Draft NP against those policies. It may be that the Draft NP considers that the policies of the Core Strategy (2011) are those such policies but clarity is required and further consultation should be undertaken once this has been provided.

*Paragraph 1.2.4*

The Development Plan for the Borough of King’s Lynn and West Norfolk is presently led by the adopted Core Strategy which covers the period up to 2026. Whilst we note the aspiration of the forthcoming Local Plan to cover the period to 2036 that Plan is at a very early stage and there is no certainty that the plan will end up covering that period of time. Given that Neighbourhood Plans are allowed for via separate legislation it is not appropriate to allow for the Draft NP to cover the period to 2036 due to the potential incorporation of provisions for Neighbourhood Plans within the new Local Plan. Such Neighbourhood Plans could be published regardless of the Local Plan in this regard.

We can therefore see no valid reason to extend the time period for which the Neighbourhood Plan covers further than 2026.

*Paragraph 2.4.5*

We would welcome sight of the evidence which confirms that 20% of the housing stock in the parish is marketed as holiday lets.

We note that asserted amount of mobile homes/caravans within the village (135) and therefore query this given the 202 mobile or temporary structures figure identified in section 10 of the Socio-Economic Profile of the Neighbourhood Area (dated September 2016).

In any event we consider that an analysis of those mobile homes/caravans with planning condition restrictions preventing permanent occupation should be provided as such restrictions would mean that these properties should not be considered as properties which are unable to be inhabited permanently.

Whilst the Borough Council’s web-site does not allow for a full planning history search of sites within the village we have located the following:

<b>Site and Number of Mobile Units</b>	<b>LPA Application Number</b>	<b>Restriction on Permanent Residential Use?</b>
Sunnymead Holiday park – 14 mobile units	2/01/0808/F	Yes: limited to 11 months per year only
The White Horse caravan park – 64 mobile units	11/00367/LDE	Yes: limited to 3rd week of March and October 31st each year
Riverside Caravan Park – 22 mobile units	08/02548/LDE	None

We are also aware of the Newholme licensed caravan site (limited to 5 mobile caravans) and the facilities at Drove Orchard which provides glamping and similar accommodation with 5 different

types of accommodation seemingly available<sup>10</sup>. None of these are permitted to be occupied permanently.

The table above amounts to 100 mobile units with a further 10 listed in the paragraph below it. We therefore favour the 135 figure within paragraph 2.4.5 of the Draft NP as opposed to the 202 figure. We return to this matter later within this letter.

*Note: in relation to this matter we have also tried to interrogate the plan on page 5 of the 'Future Housing in Holme-next-the-Sea' report but the plan has been produced at such a small scale that it is not possible. We are unclear whether the facilities at Drove Orchard have been included but note in any event that this is restricted to holiday accommodation.*

#### *Paragraph 2.4.6*

We make a number of comments in relation to this paragraph and provide these against Draft Policy HNTS 16.

#### *Section 2.5*

We note that the Conservation Area Character Statement is a 'Draft' document which dates from 1978 (revised in 1992) and would urge the Borough Council to update this document. Until such time as that takes place the document carries reduced weight in our view.

#### *Paragraph 3.2.1*

These figures should be viewed in the context of a number of other factors which are outlined below.

Evidence from the Resolution Foundation<sup>11</sup> has confirmed that between 2000-02 and 2012-14 there has been a 30% increase in the proportion of adults who own second homes in Great Britain: this equates to 1 in 10 adults.

As set out above mobile accommodation within the village can be occupied for considerable periods of the year and this does not appear to have been taken into account.

#### *Paragraph 3.2.3*

This is the first location that concerns over social cohesion are located – we find that the Draft NP is not conclusive on this point and that there is no real evidence to show that the social cohesion of the village is or has suffered such that intervention by way of draft NP policy HNTS 16 could be justified. We return to this below.

#### *Paragraph 3.7.1*

We query the evidence which allegedly points towards the parish reaching its carrying capacity in terms of the further expansion of second homes, holiday lets and visitor numbers/activities. Our concerns principally relate to the evidence in relation to second homes and holiday lets – we cannot see any evidence in this regard.

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<sup>10</sup> <https://droveorchards.com/pages/wild-luxury> viewed 12th July 2019

<sup>11</sup> 21st Century Britain has seen a 30 per cent increase in second home ownership (August 2017)

## **Holme-next-the-Sea Neighbourhood Plan 2016-36 Part B: The Policies**

### *Paragraph 1.1.2*

The text in bold needs to be put into some form of context or removed.

### *Paragraph 3.2.2*

We note the quote to a Panter and Liley 2016 document and have been unable to locate this: if any reliance is to be placed on the document then it should be quoted in full. We do in any event note the reference to “within walking distance” and query whether any development within or adjacent to the proposed settlement boundary of the village would be in such a location. The NDP reports should also be referenced in full with the respective dates.

### *Policy HNTS 2: Holme Village Zone*

The second paragraph of the policy could be construed as not permitting new ancillary buildings to be erected which require planning permission (rather than not requiring permission under permitted development). The text should be re-worded or the paragraph removed.

### *Policy HNTS 3: Protected Sites Zone*

Other than in relation to inconsequential development (for which a Draft NP planning policy is unnecessary) it is difficult to see how a proposal could reduce traffic and car parking.

The term full environmental assessment should be clarified as this could mean a variety of things.

### *Policy HNTS 4: Adaptation and Resilience Zone*

We do not consider this policy to be necessary given the types of development it envisages. Such proposals do not require this policy analysis and can be determined without the need for the policy.

### *Paragraph 6.2.3*

Please can the reference for the sea level change be included.

### *Policy HNTS 5: Countryside Zone*

The policy should not restrict new development to just agriculture – this could be amended by amending the word ‘and’ on the third line to ‘and/or’. Without this amendment the policy conflicts with Core Strategy Policy CS10 and paragraph 83 of the NPPF.

The policy also states that development that would create redundant structures will not normally be permitted: we question the purpose of such a statement as no development would ever propose a redundant structure? Also restricting new isolated development may not be appropriate as this could harm the functioning of a farm or tourist related activities (such as a bird hide).

### *Paragraph 7.2.2*

The text ‘driven by high profit margins from development’ is entirely inappropriate and should be removed. In our view the full paragraph should be deleted.

*Paragraph 8.1.1*

It is ironic that the Draft NP seeks to support tourism-related uses in this location given that the facility is divorced from the settlement. A consistent approach should be adopted within the Draft NP which aligns with Core Strategy Policy CS10.

*Policy HNTS 6: Drove Orchards*

Our comments in respect of the tourism uses above relate to this draft policy also: the Draft NP must adopt a consistent approach here. We would suggest amending the 'serious' highway safety impact to 'unacceptable'. The impact on the flow of vehicles must also be severe rather than just interrupting in order to be consistent with paragraph 109 of the NPPF.

*Paragraph 8.2.4*

The acceptance that the Drove Orchards development conflicts with Core Strategy Policy CS10 is made here and this leads us to again question allowing further tourist use at this site.

*Paragraph 9.2.1*

We note the opinion that the village has a thriving economy and the recognition that second homes and holiday rentals make to this.

*Policy HNTS 8: Sustainable Travel and Tourism*

We question how the provision of the footway and cycleway listed within the policy will be delivered. Further assessment of ownership rights and viability should be considered.

*Paragraph 10.2.1*

We would request that the unplanned growth in tourism be specified to a particular site.

*Policy HNTS 9: Touring and Permanent Holiday Accommodation*

The third paragraph of the policy is negatively worded and there is no evidence to show that additional accommodation is not required – in fact Draft NP policy HNTS 6 supports new tourism uses which could include additional accommodation.

The policy is in conflict with Core Strategy Policy CS10 and NPPF paragraph 83.

*Paragraph 11.2.1*

We note the comments here that many visiting families are now considered to be part of the community.

*Paragraph 11.2.4*

The 'pointers' referred to in this policy require further embellishment as we are not aware of any evidence which suggests that a capacity has been reached.

*Paragraph 11.2.6*

We question whether the mobile accommodation can in fact accommodate the volume of people suggested. This may though create a qualitative need for smaller scale tourist accommodation of say 2 bedrooms (for up to 3-4 people).

*Paragraph 11.2.8*

We find all four bullet points to be inaccurate as follows.

In relation to travel to adjacent settlements the village is within a rural location and it is to be expected that car journeys may be required: this does not create a greater than average trip generation as such trips are commensurate with those of other residents in the village. In any event the village benefits from existing facilities (as noted earlier the Draft NP states that the economy is thriving) and also has a good bus service.

It does not follow that any surplus of accommodation within Heacham or Hunstanton means that such accommodation would not be sought after in Holme. The tourist facilities within Heacham and Hunstanton are different to those in Holme.

Not qualifying to pay CIL is not in our view a reason to not provide further accommodation.

Any impacts arising from visitor pressure are unlikely to be significant and mitigation can be secured if required. Such mitigation will inevitably assist wider objectives. Doing nothing will require public money to be used to deliver the necessary mitigation and we therefore question the deliverability in that scenario. Our position here is supported by the approach in respect of flood risk where a managed re-alignment approach is to be undertaken.

*Policy HNTS 10: Street Scene, Character and Residential Environment*

We do not consider that the restriction to no more than 40% plot coverage is necessary – the criteria based approach within the remainder of the policy provides sufficient management of the impacts such that this final restriction is unnecessary.

*Paragraph 13.2.3*

We consider that the reference to the 40% figure is unnecessary for the reasons set out above. There is in any event no plan showing how the 40% figure has been derived.

*Paragraph 14.1.1*

We again note that the Borough Council's document is a draft and therefore the basis for this section and draft policy HNTS 12 is questionable.

*Policy HNTS 13: New Homes*

We note that Part A of the policy includes the 40% site coverage restriction which we do not consider to be justified as set out above. We note also the floorspace size range of 80-150 square metres (GIA).

We disagree with the Principal Homes restriction as set out below with regard to our comments on draft policy HNTS 16.

We support in principle the allocation of the site within Part B of the policy. In respect of part a. of the policy we have concerns over the size restrictions of 80-120 square metres and consider that the upper threshold should be increased to 150 square metres so that it is consistent with Part A of the policy.

A plan showing a potential development option for the site is included as **Appendix Two**.

*Paragraph 15.2.4*

We note the suggested housing issues and comment as follows.

- i) We consider the concerns over the extent of second homes/rental properties under Policy HNTS 16 below;
- ii) There are disparities over the amount of mobile accommodation as noted before – the Draft NP quotes 135 units. Some of those units are able to be occupied all year round and others have time limits which would allow for occupations over the majority of the year;
- iii) Council tax bands do not provide an appropriate basis given that the Borough is diverse in terms of its housing market areas with the majority of the population being within and around King's Lynn where average house values are: £251,075. For Holme the average value is almost double at £550,996<sup>12</sup>. The percentage changes within Council Tax Bands A-D are not considered to be significant in our view.
- iv) The alleged mismatch between household stock and size is noted but this is controlled by the market ultimately and we do not see a case for the planning system to intervene in this regard.

*Paragraph 15.2.5*

We note the slight above national average increase in new housing stock over the period 2001-11. However given the NPPF (paragraph 59) requires a significant boost in housing we expect that the figure between 2001 to date would be comparable or higher.

*Policy HNTS 15: Extensions, Annexes and Outbuildings*

For the reasons set out above we do not consider that the 40% coverage restriction need be applied here given the other existing development plan policies and those which may be adopted through the Draft NP.

*Policy HNTS 16: Principal Residences*

We do not consider it reasonable to apply the restriction here to replacement dwellings: for example in the event that the dwelling being replaced was beyond economic repair or fire damaged then it would be unfair for a condition to be applied. The restriction could apply upon replacement dwellings which doubled the original floorspace but this would need to be reviewed on a case-by-case basis.

In relation to the residency restriction we have significant concerns in this regard as follows.

In terms of the **justification** for this policy we have reviewed The Parish Economy evidence base: research report (January 2019) which confirms that second homes and holiday lets help to drive the economy (paragraph 5.1.5) and that some tertiary activity also depends on these income streams. Paragraph 3.2.7 also confirms that second home owners bring external income to the

<sup>12</sup><https://www.zoopla.co.uk/house-prices/> viewed 15/7/19

Parish and therefore make a “net positive contribution” to the local economy. Paragraph 3.2.1 unequivocally states that:

“ ... the justification for trying to reduce the proportion of second home ownership is primarily social and it would be wrong to assume these homes do not make a positive contribution to the economy.”

It is therefore clear from that evidence base document and others that the sole justification for policy HNTS 16 is a social one.

We have noted reference to the St Ives Neighbourhood Plan in Cornwall and we are aware of the history to that. The High Court judgment<sup>13</sup> in that regard confirmed a number of points as follows:

- i. Cornwall Council’s Affordable Housing Team objected to the principal residence policy;
- ii. Concerns were made that the policy would depress the tourist and leisure industries in St Ives;
- iii. Exceptional justification is required to justify a principal residence restriction;
- iv. The Examining Inspector (for St Ives) concluded that the restriction was necessary in the economic interests of the town.

The exceptional justification is evidently correct given the proposed Section 106 mechanism within the Draft NP: such a planning obligation can only be used to make an unacceptable development acceptable. In our view there is insufficient evidence to suggest that planning policy needs to intervene in the circumstances which prevail here.

Given the reliance upon social factors to seek to justify the policy there appears to be no real evidence, aside from assertions about social cohesion, to demonstrate that social factors require intervention via planning policy. For example the local facilities within the village appear to be viable and benefit from ongoing patronage: we would have expected evidence of such facilities closing down due to lack of use if the Draft NP assertions were correct. Furthermore there are also no details of housing need (such as a Housing Needs Assessment) which could seek to justify first time buyer type accommodation.

Concerns in relation to social cohesion have not adequately been set out and some evidence points to the contrary. For example paragraph 4.1.3 (second bullet point) of the Future Housing Evidence Base states that “many second homeowners make a positive contribution to village life”.

It appears to us that the basis for the policy essentially falls within paragraph 3.3.3 of the Parish Economy evidence base document.

In response to those two bullet points we consider as follows.

Firstly, as noted above, there is no evidence (for example by way of a Housing Needs Survey) to show that potential full time residents are being excluded from the housing market. In this regard we note the lack of employment opportunities within the village in terms of the availability of local employment. This is not to say that the village economy is not thriving – it relates more to the role of the village and the lack of employment nearby given the distances to higher order settlements.

Secondly it does not necessarily follow that additional visitor pressure will result from dwellings which are not occupied as principal residences. There is in fact every likelihood that ‘principal’ residents will utilise those facilities more regularly than a ‘second home’ owner by virtue of them living in the area for longer periods.

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<sup>13</sup> (RLT Built Environment Limited) v The Cornwall Council and St Ives Town Council 2016



We therefore consider that the policy is not justified.

With regard to **viability** our concerns here relate to the land allocated under Part B of policy HNTS 13. The criteria based approach within that policy brings with its significant constraints as set out in the table below:

Criterion	Requirement	Viability Impact
a.	Five small market homes of approximately 80-120m <sup>2</sup> gross internal floor area plus single garage, to be accessed from Eastgate	We have set out above that the upper threshold is too low in our view: this would improve viability of the development
b.	Offering a choice of two and three bedrooms arranged as either single or two storey and including a choice of semi-detached and/or terraced properties	We do not consider that this will have any negative impact upon the viability of the development
c.	Traditional design and materials reflecting the character of the neighbouring, converted agricultural buildings at the Old Dairy and Manor Court and sympathetic to the Conservation Area setting	Whilst we agree that the materials should be utilised this does impact the viability of the development by increasing the building costs
d.	Trees and hedgerows to be retained where possible and supplemented with landscaping incorporating native species	We do not consider that this will have any negative impact upon the viability of the development
e.	Subject to all other policies in the NDP with the specific exception of access arrangements which may be varied to allow for a single points of access in order to reduce the impact on the Conservation Area or to satisfy highways requirements	We do not consider that this will have any negative impact upon the viability of the development

The site will also require alterations to levels and archaeological investigations together with a CIL contribution. Our analysis of the viability of the development, which is based upon experience of similar projects across Norfolk, is that the development would be viable but only if the principal residence restriction were to apply to 1 of the 5 allocated dwellings.

As shown via the plans at **Appendix Two** the type of development which we would intend to propose at the site would be a mixture of 2 and 3-bed dwellings. Whilst the principal residence restriction would make the development unviable the type of prices which would be achieved by the sale of such new unrestricted occupancy stock would create a more affordable market dwelling than that which currently exists within the village in our view.

We also have concerns that should this policy be made then the resulting impact will in fact increase house prices of existing stock as it will make such properties finite within the village. Releasing new housing (which is unrestricted in terms of occupation and of the appropriate size) will in fact deliver additional housing stock which would be more affordable whilst also freeing up existing stock and more generally lowering house sale prices by placing additional stock onto the market.

We consider therefore that policy HNTS 16 would create viability constraints which would harm the delivery of the proposed housing allocation within the Draft NP. Our analysis has shown that one principal residence could be delivered within a viable scheme. We also have concerns that this approach will in fact raise house prices across the 275 existing dwellings within the village by making these properties finite.

Turning to more practical considerations we have concerns over the enforceability of the policy for the following reasons. The policy suggests that registering on the local Register of Electors will not be sufficient to prove that the property is being occupied as a principal residence. However as Holme has no service facilities (such as a doctors, opticians etc.) it will be difficult for occupiers to gather evidence to show that they are occupying in accordance with any restriction. Clearly utility and Council Tax bills will be addressed to the property but those may be considered to be insufficient evidence in themselves. Should the policy progress further then a clear list must be provided such that any future owner is aware of the requirements.

The use of the term full-time (with regard to occupancy) is also potentially confusing and could be the subject of debate. Given the very serious lack of full-time employment within the village there is every chance that a future occupier may need to work and live away from the village for spells during the week as a minimum. Such a scenario would have been less likely to occur in a town (such as St Ives).

This full time restriction will therefore inevitably prevent people from gaining a mortgage on a house owing to concerns over interpretation of the restriction. We also would suggest that it would be unnecessary to add a Section 106 Agreement and a planning condition to restrict the occupancy.

Our comments above apply where relevant to paragraphs 18.2.1 to 18.2.7 inclusive.

Overall therefore policy HNTS 16 is not justified, would create adverse viability conditions on land to be allocated for housing and would be impractical in terms of adherence to it.

Policy HNTS 19: AONB Landscape Quality

We consider that this policy should be amended to include allocation under HNTS 13 B as if it were within the settlement boundary. Whilst the removal of the agricultural building will create some positive impacts upon the landscape quality the Draft NP policy HNTS 13 must have assessed any impacts arising from the allocation by virtue of the criteria based approach it adopts.

Policy HNTS 24: Traffic and Car Parking

We do not consider that the requirement (within the first paragraph) to demonstrate no additional on street parking is reasonable given that inevitably deliveries and visitors may need to be legitimately park on the street.

In relation to the second paragraph such an obligation would need to be full justified on a case-by-case basis and is likely in any event to be covered by CIL. This paragraph should therefore be removed.

## **Holme-next-the-Sea Neighbourhood Plan 2016-36: The Parish Economy**

### *Paragraph 1.2.7*

We note the reference to local services – in our view these are sustained by use arising from the type of accommodation which the village has – a mixture of residents, second homeowners and holiday makers. It is just as likely, potentially more so, that second homeowners and holiday makers will use these services regularly when they are in the village.

### *Paragraph 2.1.2*

We are not convinced that the health care employees necessarily work within the village.

### *Paragraph 3.2.2*

It is noted that the document states that many second homeowners visit very frequently and also make a key contribution to the community and also contribute to the local economy. It is also suggested that some view their property as an investment with the houses standing empty for long periods of time. The document does not confirm what the balance of second homeowners is.

### *Paragraph 3.2.3*

It is confirmed within this paragraph the additional spending on property maintenance.

### *Paragraph 3.2.4*

This paragraph confirms that second homeowners contribute towards the local economy and help to sustain local services and facilities.

### *Paragraph 3.2.5*

The confirmation that people buy second homes and eventually retire into them is logical. The village is clearly a desirable location for retirees (which is reflected in the Figure 3 which shows over 35% of usual residents in the village were retired) and the importance of this is confirmed throughout this document.

### *Paragraph 3.2.6*

The assertion that second homeowners contribute “considerably” less to the viability of local shops does not necessarily follow.

### *Paragraph 3.2.7*

The confirmation that second homeowners make a net positive contribution to the local economy.

### *Paragraph 3.3.3*

Please see our comments above.

### *Paragraph 3.3.5*

We agree with the comment which confirms that there is a limit on what can be achieved through planning policy. The paragraph suggests that this approach protects the interests of existing,

Successful businesses and landlords who depend on income which arises from the natural environment. We do not consider that there is a need for planning policy intervention given the positive impacts that arise from such successful businesses.

It does not necessarily follow that applying such restrictions will create less visitor pressure in any event. The approach may end up increasing second homes and holiday lets outside of the Draft NP area which would then create additional needs for car parking at the locations whereas residents in Holme are likely to be able to walk to such locations.

*Paragraph 3.4.6*

The comment about direct income being spent outside of the parish requires clarification as it is not clear what is meant by this.

*Paragraph 3.4.9*

We have reviewed the Hun water quality report and do not consider that there is sufficient evidence to point towards water quality being harmed by use of the local environment by development or use.

*Paragraph 3.5.5*

We note the reference here to large properties but consider that this could be addressed by placing restrictions on the size of replacement dwellings rather than applying a restriction upon occupation. Any concerns in relation to sites becoming deliberately degraded should be drawn to the attention of the Borough Council who have powers to intervene.

*Paragraph 4.2.1*

The comment that permanent residents/second homeowners keep the White Horse pub going through the quiet winter months re-enforces the positive economic and social role that second home owners play within the village.

*Paragraph 4.3.2*

The opening of Drove Orchards all year round reflects the improvements to the vitality of the local economy.

*Paragraph 5.1.3*

There is no evidence which shows that prices have been forced up dramatically. Any such values must be viewed in the context of the national housing values in any event.

*Paragraph 5.1.5*

Evidence should be provided to demonstrate how many residents have been forced out of the village. We disagree that the amount of empty homes are starting to cause a degree of planning blight – if this is considered to be evident then examples should be provided.

*Paragraph 5.1.6*

We note the comments in relation to the economy and that, *inter alia*, second homes and holiday lettings drive the economy.

*Paragraph 6.2.3*

We disagree that Holme has a 'rapidly weakening community': if this is asserted then evidence should be provided.

*Paragraph 6.2.4*

This paragraph should be deleted and replaced with reference to Core Strategy Policy CS10 which supports sustainable tourist related development including new accommodation.

*Paragraph 8.1.7*

We note the comments here and would suggest that perceived unacceptable development (arising from replacing small dwellings with much larger ones) could be reconciled by Policy HNTS 13A which would restrict such proposals. This policy could even be tightened up to allow say a 50% increase for replacement dwellings (or this could be a bespoke policy).

As referred to above we have not seen sufficient evidence to show that such proposals have led to a very damaging effect upon the social cohesion of the community. For example there is no local Housing Needs register nor are existing services and facilities in decline. To the contrary the Draft NP confirms that second homeowners do contribute towards keeping the public house in the village going over the winter months.

*Paragraph 8.1.8*

We have not seen any evidence to show that buy to let properties have distorted the local housing market. In fact the NPPF includes such properties within the definition of affordable housing and so their importance to the local housing stock should not be underestimated.

Holme is similar to other villages across the United Kingdom where people commute to work – this can mean that they are away during the week.

*Paragraph 8.1.9*

The Draft NP states that second homeowners and holiday let's have a net positive impact on the local economy.

*Paragraph 8.1.10*

This paragraph does not logically follow on from paragraph 8.1.9. There are identified economic benefits from second homes and holiday lets within the Draft NP. We do not in any event agree that there are strong social and environmental imperatives for restricting new or replacement housing to that for principal residents only.

The paragraph suggests that new unrestricted dwellings would exclude local people from the housing market. However should Draft NP Policy HNTS 16 be adopted it would in no way guarantee occupation by local people – it only requires occupiers to have the property as their principal residence.

The assertion that the potential for new housing to be empty somehow undermines attempts to solve the housing crisis is rebutted. The Government is fully aware that vacant dwellings exist and according to 2017 figures 2.5% of all housing stock was vacant<sup>14</sup>.

We are not convinced that the Draft NP includes a package of measures to seek to deliver the type of homes that are needed. Policy HNTS 16 is in fact a restrictive policy which would unnecessarily prevent occupation of new dwellings via the open market. We remain firmly of the view that there is no sound planning reason to intervene within the housing market.

*Paragraph 8.1.11*

Again this makes reference to local people and our so our reasons above relate.

*Paragraph 8.1.12*

We do not agree that the village does not have any services – it does and these are valued by the community and their sustainability is underpinned by use by residents (including second home owners and holiday makers). We agree that the addition of housing is needed within the village and the provision of additional stock will help to provide additional property to the local housing market which will have a positive impact regardless of any occupancy restriction.

The development of that site would be of an appropriate scale and appearance as per the requirements of Policy HNTS 13 B.

*Paragraph 8.1.14*

We consider that the village is an attractive location for people who work away during the week as well as those who are not tied to a particular location for their work.

*Paragraph 8.1.16*

We do not consider that there is sufficient evidence to demonstrate that unacceptable impacts would result in relation to any of the three bullet points. It is not clear what is meant by the term 'structural damage': this may relate to replacement of housing with new larger properties?

*Paragraph 8.1.21*

We do not consider that there is sufficient evidence to demonstrate that the Parish has reached its carrying capacity in terms of visitor numbers. In any event we consider that any attempts to restrict occupancy within the village may not necessarily result in any fewer visitors using the area.

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<sup>14</sup> Ministry of Housing, Communities & Local Government, Dwelling Stock Estimates: 2017, England

**Holme-next-the-Sea Neighbourhood Plan 2016-36: Socio-Economic Profile of the Neighbourhood Area (2016)**

*9. Household Spaces*

We have noted above that the mobile home figure seems to be lower and note the comments within this section. The 477 all household spaces figure is evidently incorrect as is the no usual residents' figure.

*10. Types of accommodation*

The 477 all dwellings figure is again incorrect as are the associated figures within his table.

**Holme-next-the-Sea Neighbourhood Plan 2016-36: Future Housing in Holme-next-the-Sea  
(November 2017 – updated April 2019)**

*Paragraph 2.2.1*

We agree with the comment which states that intervention is needed to enable an increase in the resident population of the village. This does not though necessarily translate to a restriction being placed upon second home ownership or housing used as holiday lets.

*Paragraph 2.2.3*

A source from the known flaws should be provided.

*Paragraph 3.3.1*

Our comments above include reference to these bullet points. We would add here that mobile accommodation is not necessarily disproportionate insomuch as it is reflective of the local area and the attraction of the site to tourists. Furthermore we disagree that there is an imbalance in the housing supply.

*Paragraph 3.2.3*

We do not consider that there is sufficient evidence to demonstrate that the erection of replacement dwellings has taken its toll on the potential resident population.

*Paragraph 3.3.5*

We note the figure for mobile accommodation of between 130-140 and consider this to be accurate (see comments above).

*Paragraph 4.1.3*

The source for the December 2017 survey should be provided. We disagree that most holiday visitors have little involvement in the village as other evidence base documents confirm that they have a positive impact on the environment. We also disagree that properties being empty create an uninviting sense of place.

*Paragraph 4.1.5*

We note that acceptance that many second homeowners are long standing and active participants within the village and see no reason to conclude that future second homeowners would not also be similarly active. We disagree, as set out above, that the resident community will not survive without planning policy intervention.

*Paragraph 5.3.2*

We would suggest that the GIS exercise be available for scrutiny as it may be that considerations such as a suitable vehicular access, flood risk, heritage constraints and amenity impacts have not been adequately considered.

*Paragraph 5.3.4*

We would suggest that the Environment Agency should confirm whether a revised flood risk map will be published before the Draft NP examination takes place.



*Section 6*

For the reasons set out above we disagree with the majority of the conclusion.

**Borough of King's Lynn & West Norfolk screening report of the requirements for a Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA) for the emerging Holme-next-the-Sea Neighbourhood Plan (June 2019)**

We note that this report does not consider any alternatives which in the case of Draft NP Policy HNTS 16 is essential in our view. The alternative evidently being that this policy is removed. Given that we do not consider there to be a sufficient evidence base for this policy consideration of an alternative 'policy HNTS 16 off' approach must be considered.



**DEVELOPMENT APPRAISAL**  
**Holme next the Sea**  
**05-Aug-19**

**NET DEVELOPMENT VALUE**

Type	Area (sq m)	Area (sq ft)	Price/ sq ft	Value
Plot 1	168.52	1,814	250	453,500
Plot 2	130.62	1,406	250	351,500
Plot 3	125.14	1,347	250	336,750
Plot 4	130.62	1,406	250	351,500
Plot 5	125.14	1,347	250	336,750
	680.04	7,320 sq ft	250	1,830,000
Less:				
Costs - Legal			10,000	
Agents fee for sale of units 1-5			20,000	
				<u>30,000</u>
<b>Total Value</b>				<b>1,800,000</b>

**DEVELOPMENT COSTS**

**Acquisition and Banking Costs**

Land Cost			453,000	
Stamp Duty		2.00%	9,060	
Legals - purchase			3,000	
Legals - finance			3,000	
Bank Valuation			5,000	
Bank Arrangement Fee - 2%			22,000	
<b>Total</b>				<u>495,060</u>

**Planning and Construction Costs**

Planning Fees			12,310	
Architect			20,000	
Services			40,000	
Consultants for built heritage and ecology			15,000	
Archaeology			20,000	
CIL 50% of actual due to offsetting barn			4,606	
Levels			85,000	
Demolition & Asbestos removal			55,000	
Insurance/ Sundry Costs			5,000	
Monitoring Surveyor			7,500	
Project Manager for Construction			10,000	
Contamination remediation			5,000	

Build costs on GIA sp plus 15% of net	180	8,418	1,515,240	
			0	
			0	
			0	
Legals - Lease and Construction			0	
Insurance / Sundry			0	
<b>Total</b>				<u>1,794,656</u>

**Interest Costs**

Site Finance		12 months @ 3.00%	0
Construction Finance	1,100,000	12 months @ 3.00%	33,000
Void Finance		- months @ 3.00%	0
<b>Total</b>			<u>33,000</u>
<b>Total Development Cost</b>			<b>2,322,716</b>

**DEVELOPMENT RETURNS**

Costs financed by:

Debt	60%	1,393,630
Cash	40%	<u>929,086</u>
		<b>2,322,716</b>

Gross Profit

**Profit** -522,716**Gross Profit as a percentage of cost** -22.50%

**DEVELOPMENT APPRAISAL**  
**Holme next the Sea**  
**06-Aug-19**

**NET DEVELOPMENT VALUE**

Type	Area (sq m)	Area (sq ft)	Price/ sq ft	Value
Plot 1 (Principal Residence)	168.52	1,814	250	453,500
Plot 2	130.62	1,406	425	597,550
Plot 3	125.14	1,347	425	572,475
Plot 4	130.62	1,406	425	597,550
Plot 5	125.14	1,347	425	572,475
	680.04	7,320 sq ft	382	2,793,550
Less:				
Costs - Legal			10,000	
Agents fee for sale of units 1-5			20,000	
				30,000
<b>Total Value</b>				<b>2,763,550</b>

**DEVELOPMENT COSTS**

**Acquisition and Banking Costs**

Land Cost			453,000	
Stamp Duty		2.00%	9,060	
Legals - purchase			3,000	
Legals - finance			3,000	
Bank Valuation			5,000	
Bank Arrangement Fee - 2%			22,000	
<b>Total</b>				<b>495,060</b>

**Planning and Construction Costs**

Planning Fees			12,310	
Architect			20,000	
Services			40,000	
Consultants for built heritage and ecology			15,000	
Archaeology			20,000	
CIL 50% of actual due to offsetting barn			4,606	
Levels			85,000	
Demolition & Asbestos removal			55,000	
Insurance/ Sundry Costs			5,000	
Monitoring Surveyor			7,500	
Project Manager for Construction			10,000	
Contamination remediation			5,000	

Build costs on GIA sp plus 15% of net	180	8,418	1,515,240	
			0	
			0	
			0	
Legals - Lease and Construction			0	
Insurance / Sundry			0	

**Total** 1,794,656

<b>Interest Costs</b>			
Site Finance		12 months @ 3.00%	0
Construction Finance	1,100,000	12 months @ 3.00%	33,000
Void Finance		- months @ 3.00%	0
<b>Total</b>			<u>33,000</u>
<b>Total Development Cost</b>			<b>2,322,716</b>
 <b>DEVELOPMENT RETURNS</b>			
Costs financed by:			
Debt		60%	1,393,630
Cash		40%	<u>929,086</u>
			<b>2,322,716</b>
 Gross Profit			
<b>Profit</b>			<b>440,834</b>
<b>Gross Profit as a percentage of cost</b>			<b>18.98%</b>