

# HOLME-NEXT-THE-SEA

## NEIGHBOURHOOD PLAN 2016-2036

### PROPOSED LAND USE ZONES



Evidence Base: Research Report

10 November 2017

# Discussion document - Proposed Zoning for Holme-next-the-Sea Neighbourhood Plan

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## PLANNING FRAMEWORK

### 1.1 Background

1.1.1 NPPF 1 supports local councils in producing "... their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities". NPPF2 indicates that "Planning policies and decisions must reflect and where appropriate promote relevant EU obligations and statutory requirements". Neighbourhood Plans must be developed with due regard for the NPPF and they stand alongside Local Plans and are regarded as a material consideration in determining planning applications.

1.1.2 Following on from NPPF 14 (presumption in favour of sustainable development), NPPF 16 requires that Neighbourhood Plans

- "... support the strategic development needs set out in Local Plans, including policies for housing and economic development" and
- "plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan..."

1.1.3 Associated DCLG Guidance (6 March 2014) makes it clear that "Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. *They are able to choose **where** they want new homes, shops and offices to be built, have their say on **what those new buildings should look like and what infrastructure should be provided, and grant planning permission for the new buildings they want to see go ahead.*** Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community *where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area.*"

### 1.2 Approach

1.2.1 In order to satisfy these NPPF requirements it is important that there is close collaboration between the developers of Neighbourhood Plans and professional planning teams within local authorities. The HNTS approach to the Neighbourhood Plan is therefore to consult with BCKLWN to ensure that we understand the broader, strategic objectives within the Borough and come forward with a plan that will contribute to and supports these. Equally, our plan needs to support and deliver the aspirations of the Parish community. Through effective consultation we hope to deliver a plan that will be of positive benefit to all involved.

1.2.2 From previous discussions it has been agreed that:

- BCKLWN will support organic growth of housing at a rate consistent with that of the previous plan period.
- By virtue of its status as a 'Smaller Village and Hamlet' the Borough does not expect to propose/support site allocations for the Parish and would expect the necessary growth to be achieved by infill as set out in existing policy (SADMP, DM3). However,

if consultation demonstrated strong public support for one or more allocations the proposed sites would be considered on their merits.

- In order to be consistent with the updating of the Local Plan, Holme-next-the-Sea should have an agreed development boundary.

1.2.3 Subject to further consultation within the Parish, the Neighbourhood Plan team is aiming to deliver a plan that enables at least this level of growth within the context of protecting and exploiting the Parish's very special environmental assets. These make a major contribution to the local economy and not only do they underpin this, according to consultation feedback, they are the most significant and common denominator in explaining the value that both residents and second homeowners place upon Holme.

1.2.4 After considerable consultation, evidence gathering and discussion<sup>1</sup> the HNTS Neighbourhood Plan team have reached the conclusion that the most appropriate route forward for the Neighbourhood Plan is to direct **where** development will go by means of a series of zones, each with clear planning objectives. A development boundary will be a key part of the zoning system and this is in fact a suggestion put forward in independent responses from the Questionnaire Survey.

1.2.5 The purpose of this document is to set out the proposed zoning, justify its structure, explain the broad objectives for each zone and in particular to ensure that it:

- Provides a basis for moving forward that is consistent with the existing SADMP/Core Strategy and, where possible at this point in time, the emerging Local Plan.
- Forms an effective framework for developing NDP policies and clear guidance for implementation by decision-makers.
- Has the support of BCKLWN.
- Can be presented with confidence to the next Parish Consultation.

1.2.6 The underpinning logic of the zones is that different parts of the Parish are appropriate for different types of development and not appropriate for others. To achieve sustainable development it is necessary to get the right type of development in the right place. For example, it may be appropriate to locate new housing within the Settlement Zone but not appropriate within the internationally designated sites.

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<sup>1</sup> Including discussions with residents, second home-owners, land owners and statutory consultees



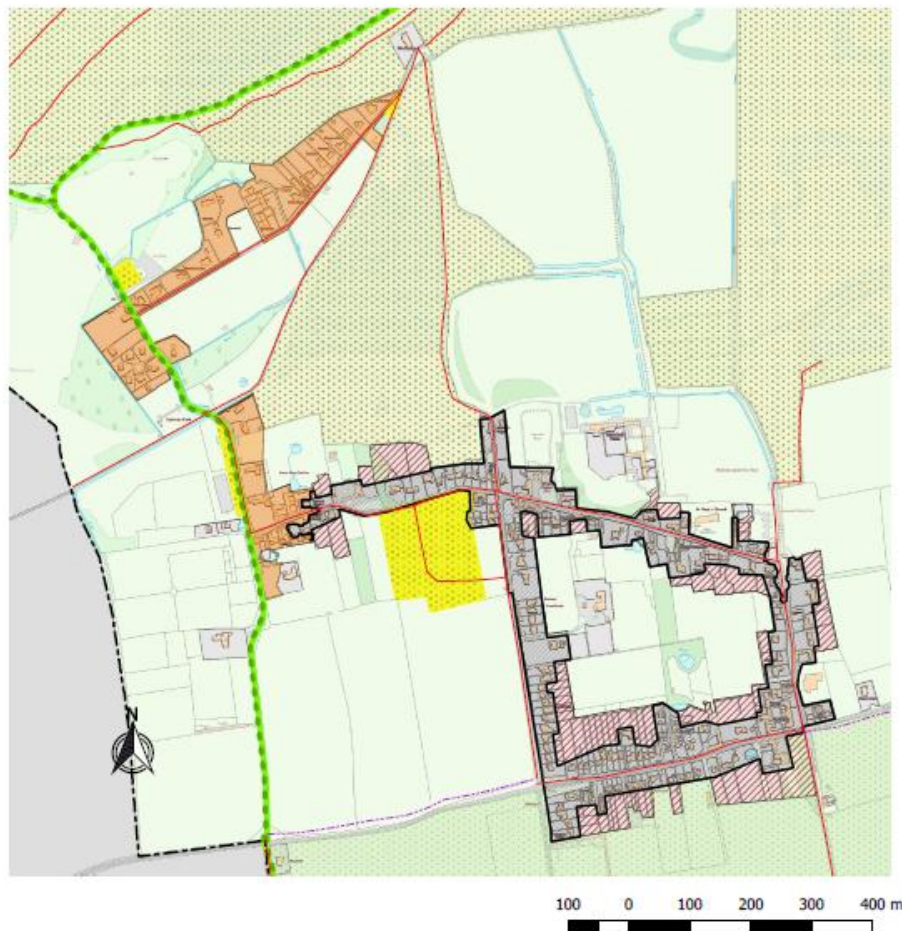


2.1.2 The map also shows the substantial areas of the Parish that lie in the Flood Zone (Environment Agency Flood Zones 2 and 3) and the location of footpaths and walks which are a very important feature of the Parish.

## 2.2 Zone 1: Settlement Zone - Development Envelope and Garden Land

### Purpose

The purpose of Zone 1 (Figure 2) is to ensure that there are sufficient infill sites to deliver organic growth of housing at a rate similar to that of the previous plan period



### Plan Zones

- Development Boundary
- Garden Land
- Managed Coastal Change
- Protected sites
- SMP Adaptation & Resilience
- Drove Orchards
- Local Green Space
- Neighbourhood Area

### Footpaths & Walks

- Proposed
- Paths and Walks
- National Trail & Coast Path

### Other Zones

- Flood map 2
- Flood map 3

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Map derived from Environment Agency Open Data Lidar: © Environment Agency copyright and/or database right 2015. All rights reserved.  
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**Figure 2: Zone 1: Development Boundary and Garden Land**

as requested by the Borough Council. It is also to ensure that its location, scale and form is consistent with the wishes of parishioners as expressed through the consultation process.

## **Description**

2.2.1 The Settlement Zone contains the main part of the village of Holme (See Figure 2) and corresponds closely to Built Area Types C and D as defined in the 1998 Local Plan. It includes most of Holme-next-the-Sea Conservation Area. The zone is sub-divided into Zone 1a (Development Envelope) and Zone 1b (Garden Land). New development must take place entirely within the Development Envelope subject to policies in the SADMP (including DM2) together with other policies in the LDF that relate to development in Smaller Villages and Hamlets, plus relevant policies in the NDP. This development must be in the form of infill within gaps between or adjacent to existing dwellings and must front onto the existing road network (this reflects local preferences as expressed through the Neighbourhood Plan Survey). The 'Development Envelope' is marked as the solid black line on the map.

2.2.2 Zone 1 has been created according to the following rules:

- The Settlement Boundary encloses the curtilages of the properties in Holme village as shown on the Raster Ordnance Survey Map District Product as currently supported by OS (2017). More isolated properties in the countryside have been excluded from the Settlement Zone in order to preserve the characteristic form of the settlement.
- Initially, it was envisaged that the Settlement Boundary would also constitute the village Development Envelope. However, BCKLWN suggested that this would not be consistent with the existing and emerging Local Plan because it resulted in too much scope for development to the rear of properties with large back gardens. As a consequence, a smaller, more restrictive Development Envelope (Zone 1a) has been created with a boundary closer to the rear of houses with such gardens. This has the effect of focusing the area of development and preventing unacceptable back land development thereby protecting the form and AONB setting of the village (see below).
- The remaining areas of Zone 1 (Zone 1b, Garden Land) lie between the Development Envelope and the outer edge of the entire Settlement Zone. These are shaded red in Figure 2.
- Back land development in Zone 1b will not be permitted although this will not affect any existing use rights or permitted development rights which continue to apply in Zone 1b.
- This approach is thus consistent with both the emerging local plan and the policy approach to definition of boundaries adopted in SADMP Policy DM2.
- In particular, Paragraph C.2.8 of the SADMP states "The boundaries are not intended to necessarily reflect the full extent of existing built development or of settlements. They exclude parts of settlements where further development is not encouraged. In particular, extensive gardens and other back land are generally excluded from the

development boundary, as the Borough Council considers back land development is generally incompatible with the form and character of development it wishes to promote in the area (note that exclusion of such back land does not affect existing use rights, nor limit any permitted development rights the property might enjoy.)

- This approach is also in keeping with parishioners preferences as shown by the Consultation Survey Questionnaire Analysis (two-thirds of respondents indicated that they would find back land development unacceptable).
- Where gaps occur between curtilages with a road frontage, the Development Boundary has been drawn to include the gap by connecting the rear boundaries. This rule has been followed notwithstanding the presence of non-residential buildings in the enclosed space. Where this would result in an awkward shape tending towards a triangle, one curtilage boundary has been extended back to create a more rectangular shape.
- The Development Envelope has then been adjusted to remove any areas which fall within the Environment Agency's Flood Zone 3.
- Outlying properties on the edge of the village and beyond have been excluded.



### **Contribution to sustainable development**

- 2.2.3 The contribution to sustainable development is to ensure that the assessed housing needs of the Parish can be met within the plan period.
- 2.2.4 Zone 1 will be subject to other policies in the NDP including ones which aim to protect the characteristic form of the settlement, control the size of replacement dwellings and promote principal home ownership (to be decided).

## **2.3 Zone 2: Managed Coastal Change Zone**

### **Purpose**

The Purpose of this zone is to ensure that appropriate development can take place provided that it does not increase direct or indirect exposure to flood risk or impact on sensitive conservation sites, protected species and the tranquil AONB setting that contributes to the amenity of the 100,000+ visitors/year (Norfolk Wildlife Services, 2010) who come to this location.

Appropriate development will be that which facilitates adaptation and resilience to climate change and flooding against the background of the SMP and does not impact negatively on the Protected Sites. It may include extensions to and replacement of existing dwellings subject to policies in the Core Strategy (CS07) and SADMP (DM15) and elsewhere in the emerging NDP. The constraints and associated costs imposed by the natural environment in Zone 2 are a small price to pay in return for the opportunity to live side by side with some of Europe's most valued habitats and wildlife.

- 2.3.1 This overall approach has been informed by discussions with the Environment Agency who are responsible for the relevant SMP frontages and is in line with SADMP Policy DM18 which applies to the Hunstanton/Dersingham frontage to the South.

### **Description**

- 2.3.2 This zone includes part of Beach Road, all of the settlement on Broadwater Road and a small area of the village around Whitehall Farm. Housing along Beach Road and Broadwater Road has developed over a long period of time and there is an eclectic mix of housing styles on plots which tend to be large and well spaced. Whitehall Farm is a Grade II listed building and in the 1998 Local Plan was classed as Built Environment Type B. This and parts of Beach Road are included in the Holme Conservation Area. The area at the junction of Beach Road and Broadwater Road has a car park, toilets and Beach Cafe.

- 2.3.3 Although in functional terms this settlement is an integral part of Holme Village it was decided not to include it in the Settlement Zone/Development Boundary for the following reasons:

- It is entirely within Flood Zone 3 and parts are within the area which may be affected by the Managed Realignment Policy for Holme in the Shoreline Management Plan (2009). Access to Broadwater Road was cut off by the flood waters when the sea defences were breached in 2013.
- Many of the properties share boundaries with sensitive, protected sites (see Designations Report) including RAMSAR, SAC, SPA and SSSI. Noise, light pollution and sewage disposal are significant considerations and there are clear water quality issues impacting on the lagoons which are qualifying features for the Protected Sites.
- The Broadwater Road area is known to provide habitat and a corridor of movement for European Protected Species (especially Natterjack Toad, but also Great Crested Newt, water vole and bats) and *the cumulative impact of incremental development* in this zone is contributing to habitat degradation. There are particular concerns for the Natterjack population which has, until recently, been showing signs of recovery.
- The outstanding environmental qualities of the area are a magnet for speculative development. A 0.5 acre plot with permission for replacement of a modest single storey dwelling recently sold for over £600,000 (Spring 2017).

- 2.3.4 Any development here clearly needs to overcome significant obstacles. Nevertheless, it would be inappropriate to rule it out altogether. Whilst new housing development is unlikely to be sustainable given the SMP – replacement of and improvements/extensions to existing properties may be appropriate – particularly if they offer the possibility of improving resilience to flood risk, climate change, water quality, impact on protected sites and visitor amenity (consistent with NPPF 99).

### **Contribution to sustainable development**

- 2.3.5 The contribution to sustainable development is to protect the community insofar as it is possible from the impacts of sea level rise and climate change and promote a safe and



sustainable future for existing property and residents whilst protecting the internationally important conservation sites adjoining this zone.

## **2.4 Zone 3: Protected Sites**

### **Purpose**

- 2.4.1 The purpose of this zone is to ensure that the Protected Sites achieve their objectives, including conservation of internationally important wildlife and biodiversity, whilst retaining a sense of wildness and tranquillity appropriate to their designations and AONB setting (Core Strategy, CS12). NDP policies for the zone, insofar as they can, will seek to diffuse visitor pressure to other parts of the Parish, reduce visitor impacts on Holme village (especially traffic and car parking), reduce pollution and promote resilience to climate change as required by the SMP, NPPF 99, the Norfolk Coast AONB Management Plan Strategy (2014-19) and the LDF (Core Strategy CS07).

### **Description**

- 2.4.2 The Protected Sites in Holme cover c. 42% of the Parish and form part of the wider North Norfolk Coast area of RAMSAR, SAC, SPA and SSSI designated sites (Evidence Base: Research Report 10). The Holme Dunes National Nature Reserve is almost entirely within the Parish and has all of these designations. It occupies an area of 213 ha and has been managed by the Norfolk Wildlife Trust since 1965. Its semi-natural landscape is of international importance for wildlife – especially migrating birds. The site was initially established to protect sensitive ecology and to support field research. Its purpose has however widened from managing some of the country's most pristine habitats and rarest species to include providing opportunities for the public to experience the natural heritage of Holme.
- 2.4.3 The AONB setting, peace, tranquillity, sense of wilderness and wildlife associated with this zone are the things that parishioners indicated they value most in the Consultation Questionnaire (Evidence Base: Research Report 2). This is the main source of amenity for the Parish and delivers ecosystem services that underpin the local economy and make a substantial contribution to the wider regional economy.
- 2.4.4 Evidence gathering in response to the views expressed in the consultation survey has revealed growing evidence that the pristine habitats and sense of wilderness characteristic of the area are being eroded by increased visitor numbers, inappropriate development, noise and light pollution and poor air and water quality - indicating that local people are right to be concerned. If these issues are not addressed negative impacts on the protected habitats and species will continue to grow and serious damage will be inflicted on the sites.
- 2.4.5 Development in this zone must make a direct and demonstrable contribution to preserving and enhancing the key properties of the sites noted above. The policy aims will be to reduce disturbance of habitats and wildlife, air, water, noise and light pollution below existing levels and to manage visitor pressure in more effective ways without inhibiting people's ability to gain access to and enjoy these very special places.

## **Contribution to sustainable development**

- 2.4.6 The contribution to sustainable development is to ensure that this area of Holme can continue to satisfy conservation objectives and to provide a major contribution to the local economy through the ecosystem services it provides. This can only be achieved by a bold approach that faces up to the considerable challenges of managing visitor pressure, inappropriate development, pollution and climate change (NPPF 109). This must ensure that both the landscape and wildlife underpinning these services continues to remain healthy and to flourish.

## **2.5 Zone 4: Drove Orchards**

### **Purpose**

- 2.5.1 The purpose of this zone is to separate the development area at Drove from the surrounding countryside and encourage a sustainable approach to future growth, particularly to support its use for activities related to the Orchards business and tourism-related uses that are compatible with its setting in the AONB and Heritage Coast. A site-specific policy is proposed for this purpose.

### **Description**

- 2.5.2 The Drove Orchards site lies about 1.5km to the east of Holme village, to the north of the main A149 coast road, close to the neighbouring village of Thornham. Over the last 10 years the site has developed, initially to include a farm shop and subsequently a number of independent retail and food businesses, including clothing, interiors, vintage/gifts, furniture, a fish shop (currently undergoing extension to include a smokery), a garden nursery, a c60-seat yurt restaurant and take-away plus a fish and chip restaurant and take away (application just approved for a c 50-seat external extension). To the rear of the main retail area, there are two glamping sites.
- 2.5.3 In the absence of a master plan, past development has proceeded on an ad hoc basis, in part with retrospective planning consents. Part of the development has been accommodated in existing farm buildings and part in new warehouse style units with good visibility from the road. Permission has been granted for around 70 car parking spaces, with an estimated current capacity for more than three times this number. The site has grown very successfully and a consultation meeting with the owner suggests that it employs around 60 people of whom 20 are full time.
- 2.5.4 Past planning applications have raised consultee concerns regarding potentially harmful AONB impacts, traffic generation, design and materials of new buildings and competition with retail establishments in the nearby town of Hunstanton and within the neighbouring village of Thornham.

## **Contribution to sustainable development**

The contribution to sustainable development is to continue to contribute to the local economy within the overall framework for a balanced approach provided by the NPPF, acknowledging the need for development that is sympathetic to the AONB setting and proximity to the Protected Sites (NPPF, 114).

## 2.6 Zone 5: SMP Adaptation and Resilience Zone:

### Purpose

In line with the objectives and provisions of the Climate Change Act 2008, NPPF 94 notes that local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations. The purpose of this zone will be to ensure an

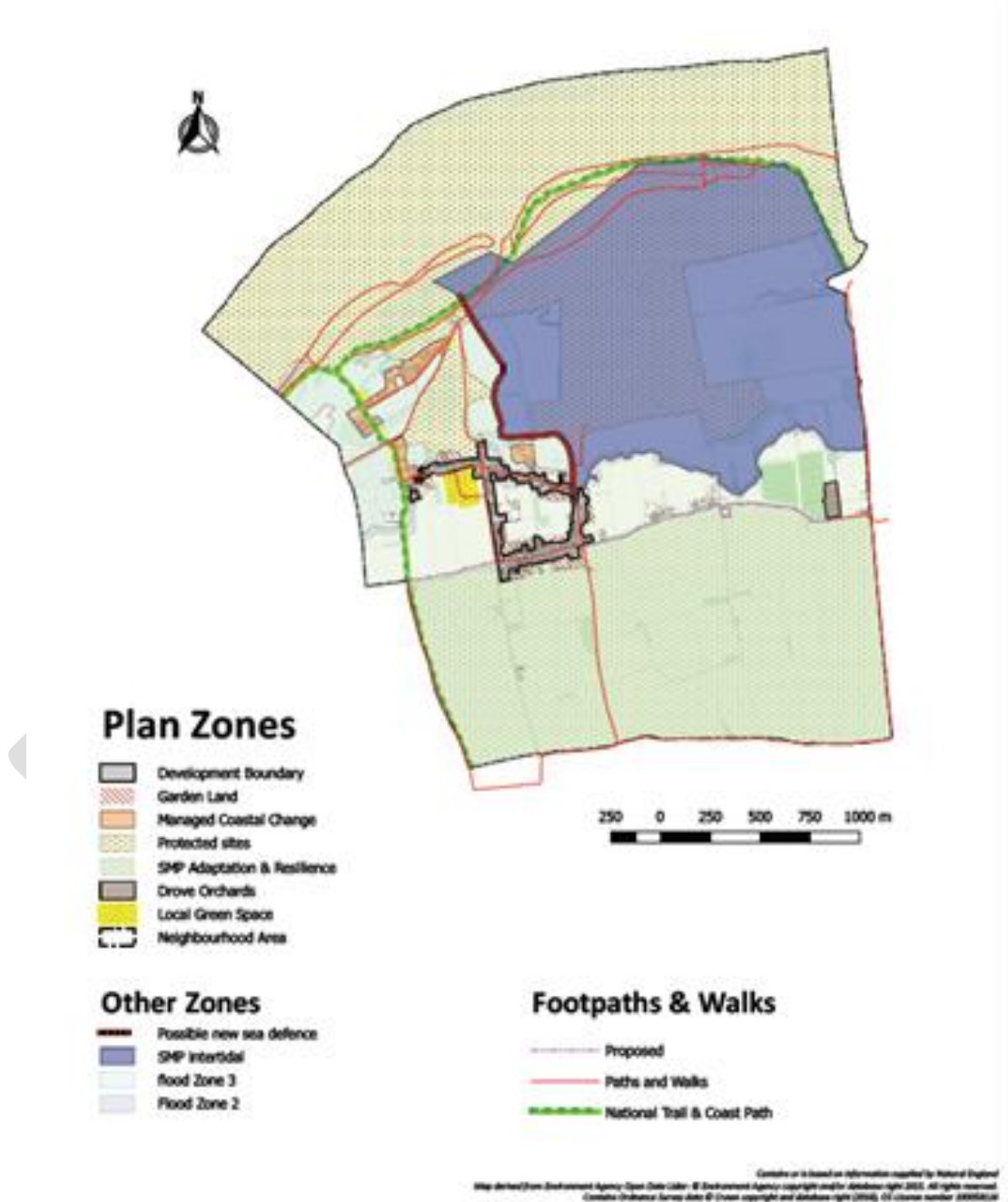


Figure 3: Impact of SMP and relationship with Adaptation and Resilience Zone

appropriate response to climate change and flooding by setting aside land in the southern part of the parish that, with appropriate planning and development control, will help mitigate the negative impacts of the SMP on economy and amenity. NPPF 168 notes the importance of the SMP in developing the evidence base for planning in coastal areas. In comparison to Zone 5, Figure 3 shows the extent of the area threatened by current SMP Managed Realignment policy. It should be noted however, that this is presented in the context of risk related to the Thornham Sea Bank Frontage only. In practice the map underestimates the overall potential impact of the SMP because the dunes to the west of the ‘possible new sea defence’ are actually under more immediate threat and these also play a key role in protecting Holme village.

## **Description**

- 2.6.1 This zone is within the area described in National Character Area Profile 76, North West Norfolk (Natural England). Its statement of Environmental Opportunity 1 (SEO 1, p15-16) underpins much of the thinking behind its objectives. By exploiting the opportunities for this type of landscape set out in SEO1 the NDP has a mechanism for addressing the deep seated environmental problems which affect the Parish.
- 2.6.2 The Protected Sites in Holme-next-the-Sea do not have a sustainable future unless action can be taken to mitigate and correct the growing impacts of visitor pressure, traffic and parking, water and air pollution and climate change. The Shoreline Management Plan (2009) both reinforces and explicitly recognises this in its SEA/HRA (see summary extracts in Appendix 1) which acknowledges that there will be ‘major negative’ impacts on the qualifying features for the sites – specifically, the freshwater reed beds and grazing marshes.
- 2.6.3 These issues present a set of complex challenges that the NDP must address. By 2036 (the time horizon of the NDP) the Parish could be a very different place. NPPF 94 requires that “Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations”. Clearly, the NDP must operate within this framework and a precautionary approach is therefore required.
- 2.6.4 This approach is embodied in Zone 1 (Development Boundary/Garden Land) by ensuring that there is sufficient land outside areas of flood risk to meet the Parish’s foreseeable housing needs. It is embodied in Zone 2 (Managed Coastal Change) by ensuring that only appropriate development can take place which increases resilience to flooding and climate change. Because Zone 3 (Protected Sites) is so critically important to the local economy and the amenity of local residents a precautionary approach is essential. Current legislation requires that if an EU protected site is damaged and habitat is lost due to a plan or project, compensating habitat must be created elsewhere. Whilst this will be necessary for the habitats threatened by managed realignment in Holme, if the Anglian Region Habitat Creation Programme is an example of the approach to providing a replacement, any compensating habitat may be very distant from the Parish. As a consequence conservation needs may be addressed but not the likely impacts on the local economy or on parishioners’ amenity .
- 2.6.5 The proposed zone is predominantly arable farmland on the north facing scarp that overlooks the coast. It has a network of public footpaths that form important links in circular walks around the parish and command stunning views of the village and the coast. It has some mature hedgerows and some significant copses of trees. It also has high levels of

biodiversity – though these are under-reported in relation to the Protected Sites which currently represent the focus of attention. Notwithstanding the fact that most of the land is currently in private ownership, an appropriate management and protection regime will enable long term improvement of the footpath network, signage, planting of more trees and hedgerows and increases in biodiversity to levels that would increase its attractions for visitors. The principle of creating small water bodies has been established just across the Parish boundary in Thornham by construction of a reservoir. Clearly, there is scope to offset the losses in biodiversity implied by the SMP and an Action Plan is needed to establish to what extent this is possible.

### **Contribution to sustainable development**

2.6.6 The contribution to sustainable development is to diffuse and reduce visitor pressure on the protected sites and the village by providing an equally attractive, area of landscape of similar size that is suitable for low key recreational activities including walking and observing wildlife and promotes the existing feeling of ‘peace and tranquillity associated with the AONB (NPPF identifies the benefits to recreation of ecosystem services and one of the 12 Core Principles set out in NPPF 17 notes the importance of encouraging multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production).

2.6.7 The site will:

- Mitigate the impacts of climate change by ensuring that in the medium to long term Holme will continue to have an environment of outstanding quality that can generate substantial ecosystem services based on exceptional biodiversity - regardless of the impacts of climate change
- Support development related to those forms of low intensity, sustainable agriculture that are consistent with the above including schemes for effective management of water resources, creation of water-related habitats including small lakes and reservoirs and creation of small scale car parking and visitor facilities on the edges of the site.
- Ensure that Holme remains an attractive place to live for people who seek a quiet, rural environment surrounded by wildlife within the AONB by continuing to provide accessible open countryside where people can walk, enjoy wildlife in a peaceful and tranquil setting with a feeling of remoteness and isolation from the pressures of everyday life.
- Protect the outstanding views of the Coast, Holme Village and the Protected Sites which can be enjoyed from existing and possible new footpaths in this Zone for visitors and residents alike.
- Preserve a core area of the Parish free of light pollution where stunning night skies can be enjoyed by all.



## 2.7 Zone 6: Open Countryside

### Purpose

- 2.7.1 The purpose of this zone will be to ensure consistency with the Local Development Framework by ensuring there is space in the Parish for development that is appropriate in a countryside setting as currently set out in the SADMP (DM2, 3, 5 and 6) and the Core Strategy (CS06, CS09) and in line with NPPF 28 and 55.

### Description

- 2.7.2 The rest of the Parish remains as open countryside and is subject to relevant policies in the LDF – including SADMP Policy DM3.
- 2.7.3 This zone lies between the A149 and the Protected Sites. Much of this land is in the flood risk zone or in the area likely to be affected by the SMP Managed Realignment policy. However a significant strip averaging about 0.3km deep alongside the A149 is outside of both. To the west of the village the zone is used almost entirely for arable farming and to the east as well as farmland there is some scattered ribbon development including housing, a camp site, and a builder's yard. Agricultural land is a mixture of Grades 2 and 3. Agricultural land to the east is predominantly grassland with some orchards in the south and grazing marsh to the north. Some of the better drained fields are used for hay.
- 2.7.4 The Zone has good accessibility to the A149 and is thus suitable for small scale development related to low intensity agriculture. Notwithstanding the growing traffic levels on the road it makes a significant contribution to the AONB landscape so development needs to be carefully controlled (NPPF 115) and consistent with this setting. As part of the Parish's broader planning approach to the environment, efforts are being made through an 'Action Plan' to establish public footpaths along the side of the road to link Holme Village to Drove Orchards to the east and the Peddars Way to the west.
- 2.7.5 The zone may also need to accommodate additional car parking and a replacement visitor centre for The Firs which does not have a sustainable future by virtue of the SMP. Clearly it is becoming increasingly difficult at The Firs to balance Conservation responsibilities with the recreational requirements of NWT members and growing numbers of visitors to the beach and surrounding dunes. Any such centre could provide a focus not only for conservation organisations and education but also improved visitor and community facilities, possibly including a shop for the village. It would need to have the agreement and support of all stakeholders as set out in the associated 'Action Plan'.

### Contribution to sustainable development

- 2.7.6 The contribution to sustainable development is:
- To ensure that local agriculture continues to thrive
  - To enable appropriate related development in keeping with the AONB Management Strategy and Objectives
  - To provide an accessible location for an improved (but not additional) visitor and community centre thereby dissipating visitor pressure from the Protected Sites,

relieving associated parking problems and contributing to jobs within the Parish / Borough economy as set out in the associated Action Plan.

### **3 REFERENCES**

Evidence Base Research Report 10, Designated Areas, March 2017

Evidence Base Research Report, Questionnaire Results Report 1 – All Respondents, 25 August 2016.

Evidence Base Questionnaire Results Report 4, Points of View 18 December 2016

Norfolk Wildlife Services (2010), Study to assess the capacity of International Sites to accommodate visitor pressure, 25pp.

BCKLWN (2016), Site Allocations and Development Management Policies plan, 481pp.

BCKLWN (2016), Update to the Sustainability Appraisal Report Incorporating Strategic Environmental Assessment for the Site Allocations and Development Management Policies Pre-Submission Document to Include the Proposed Main Modifications, 119 pp.

Panter, C. & Liley, D. (2016). Visitor surveys at European Protected Sites across Norfolk during 2015 and 2016. Unpublished report for Norfolk County Council. Footprint Ecology. Wild Frontier Ecology (2015) for BCKLWN, Habitats Regulations Assessment of Detailed Policies and Sites Plan: Site Allocations and Development Management Policies – Proposed Submission Document 107pp.

North Norfolk Shoreline Management Plan (2009), Strategic Environmental Assessment, Environmental Report, Appendix VIA. (Updated to include the effects on international sites as informed by the Habitats Regulations assessment for the SMP)

Norfolk Coast AONB Management Plan Strategy (2014-19)

National Planning Policy Framework (2012), Department for Communities and Local Government.

Natural England. Natural Character Area Profile 76, North West Norfolk.

Kings Lynn and West Norfolk Site Allocations and Development Management Policies Plan (2016-2026), Borough Council of Kings Lynn and West Norfolk.

Kings Lynn and West Norfolk Local Development Framework Core Strategy (Adopted July, 2011).

## APPENDIX 1: SMP Extract for Holme next the Sea Impact Assessment

Assessment unit F1 (PDZ 1A to 1D)				
SEA receptor (based on SI 1633)	SEA assessment criteria	Assessment	Feature identified in the SEA scoping report baseline	SEA indicator (blue shading is where there is a directly equivalent SMP indicator)
<b>Threat to biodiversity on a dynamic coast and the interactions between various coastal habitat types</b>				
<b>Maintenance of coastal processes required to maintain the integrity of critical coastal habitat and species</b>				
Biodiversity, fauna, flora (including geomorphology)	Does SMP policy provide a sustainable approach to habitat management on the north Norfolk coast?	PDZ1A provides a sustainable approach to habitat management by minimising the need for intervention in the dune system (while retaining the option for management if needed). PDZ1B provides for the continued management of the dune system/ridge to provide sustainable management based on monitoring. PDZ1C provides for realignment in epoch 2 to offer a more sustainable line of defence (based on topography). PDZ1D takes an approach of NAI which offers totally sustainable defence for this frontage.  Overall, the management in this super-frontage provides for a more sustainable approach to management based on moving the coastline towards a less managed, more natural system.	Vulnerable freshwater / terrestrial sites	Area of habitat determined as being either sustainable or unsustainable in the face of rising sea levels
	Will the SMP policy result in a change in how natural coastal processes operate?	As described above the overall intent of the frontage is to move towards natural development of the frontage, allowing the development of natural processes especially during epoch 2.	Geomorphology	Proportion of hard elements relative to the total defences Effect on neighbouring sections (judgement)
	Will the SMP policy result in a change in the condition of international sites?	<i>The SMP policy in this super-frontage allows for the natural development of the frontage (dune habitat) while allowing the landward migration of intertidal habitats through realignment in 1c). Also, the realignment at Holme will increase the tidal prism in Thornham Harbour channel and help to maintain a mosaic of subtidal and intertidal habitats. The managed realignment with within this unit would, however, lead to the loss of reedbed and grazing marsh habitat that is essential habitat for geese colonies. This unit would have an adverse effect on the North Norfolk Coast SPA and the Wash SPA and Brambar area and the effect is considered major negative.</i>	International sites and SSSI	Condition of designated features based on Habitats Regulations assessment
	Will the SMP policy result in a change to SSSI condition?	<i>The effects of the SMP overall in this unit promotes the natural development of the coastline - enabling natural change. The effect is considered minor positive.</i>		Predicted condition assessment of SSSI units
	Will the SMP policy result in a net change in priority BAP habitat area?	<i>The overall effect of SMP policy across this frontage will be to provide no net loss of BAP habitat. However, realignment at Holme will provide the creation of BAP habitat over existing non-BAP habitat - leading to a gain of BAP habitat. The overall effect is therefore considered to be major positive.</i>		Area of priority BAP habitats for each epoch and scenario.

The diagram refers to so called 'Super Frontage F1' which is the coastal strip from Old Hunstanton to Thornham Harbour. PDZ1a is Old Hunstanton dunes, PDZ1B is Holme Dunes and PDZ1c is Thornham sea defence bank. Epoch 1 is now to 2025, Epoch 2 is 2026 to 2055 and Epoch 3 is 2056 to 2105. (Source: North Norfolk Shoreline Management Plan, SEA Environmental Report, Addendum, 2009).

Note: Text in italics indicates the assessment was updated **after the issue of the original North Norfolk SMP2 Strategic Environmental Assessment environmental report**, following the production of the North Norfolk SMP2 Habitats Regulations Assessment (Appropriate Assessment) report.