

Heacham Neighbourhood Development Plan

Examiner's Clarification Note

This note sets out my initial comments on the submitted Plan. It also sets out areas where it would be helpful to have some further clarification. For the avoidance of any doubt matters of clarification are entirely normal at this early stage of the examination process.

Initial Comments

The Plan provides a clear and distinctive vision for the neighbourhood area. In particular it addresses a series of very distinctive issues which reflect both its character and coastal location.

The layout and presentation of the Plan is good. The various maps and photographs add to its depth and interest. The difference between the policies and the supporting text is very clear.

Points for Clarification

I have read the submitted documents and the representations made to the Plan and have visited the neighbourhood area. I am now in a position to raise issues for clarification with the Parish Council.

The comments made on the points in this Note will be used to assist in the preparation of my report and in recommending any modifications that may be necessary to the Plan to ensure that it meets the basic conditions. I set out specific policy clarification points below in the order in which they appear in the submitted Plan:

Policy 1

Is the policy necessary given that it essentially comments about the existing local plan allocations?

Policy 2

I understand the Parish Council's concerns about the relationship between self-build housing and the community infrastructure levy. However, the fifth criterion reads as supporting text rather than as a policy. I am minded to recommend that it is relocated into the supporting text. Does the Parish Council have any comments on this proposition?

Will the delivery of the ambitions of criterion 11 always be practicable? Should the criterion be designed to take account of the scale and nature and location of the proposed development?

Policy 3

Is the second part of the policy practicable?

Does the third part of the policy largely repeat the first part?

Policy 4

The purpose of the policy is self-evident.

However, would any proposal need to comply with all of the criteria? If so, might there be circumstances where a 50% increase of internal floorspace would result in development which would conflict with the character of the property?

Policy 5

Does the Parish Council have any comments on the representation from the Borough Council on the need for such a policy?

Policy 6

In general terms this is a well-considered policy.

Given that it is intended to have a universal effect I am minded to recommend that it is applied proportionately to the scale, nature and location of development proposals. Does the Parish Council have any comments on this proposition?

In criteria 12 and 18 what is the Parish Council's justification for the proposed threshold of eight dwellings?

Policy 9

Plainly this policy addresses an important local issue. However, does the proposed policy add any distinctive local value to the Borough-wide approach/policy on this matter?

Policy 11

To what extent does the Parish Council consider that the policy is in general conformity with Policy CS10 of the Core Strategy and follows the approach in Policy DM11 of the Site Allocations and Development Management Policies Plan?

Did the Parish Council consider identifying the 'existing defined holiday areas'?

Does the Parish Council have any comments on the potential alternative approaches to this matter as suggested by the various operators?

Policy 16

I saw the importance of the community facilities in the neighbourhood area during the visit. The facilities are clearly defined in the policy and in Figure 12.

The approach in the Plan properly takes account of viability issues and the potential for replacement facilities to come forward in the Plan period.

Policy 17

Paragraph 13.3 provides a backcloth to the development of the policy. I saw the potential need for such an approach between Heacham and Hunstanton and for the break between the various elements of built development in Heacham itself.

In this context has the Plan identified the smallest areas required to fulfil the intentions of the policy? In particular does the Parish Council have any comments on the representation from landowners (in the representation ID:9) about the identified red and green areas and the accuracy of paragraph 13.7 of the Plan?

The potential need for Settlement Break to the south of the village is less clear. Please can the Parish Council explain its thinking for this part of the neighbourhood area?

Policy 19

Is the first part of the policy necessary as it simply expresses support for an existing local plan policy?

To what extent do the second and third parts of the policy add any distinctive value to existing local policies?

Representations

Does the Parish Council have any comments on the various representations made to the Plan?

In particular does it have any additional comments (beyond those already raised on a policy-by-policy basis in this note) on the representations made by:

- Broadland Housing Association;
- Borough Council of King's Lynn and West Norfolk;
- Wild Ken Hill (Rural Solutions);
- Searles Camping Ground Limited (Avison Young); and
- RSPB.

Protocol for responses

I would be grateful for comments from the Parish Council by 9 July 2021. Please let me know if this timetable may be challenging to achieve. It is intended to maintain the momentum of the examination.

In the event that certain responses are available before others I am happy to receive the information on a piecemeal basis. Irrespective of how the information is assembled please could it all come to me directly from the Borough Council. In addition, please can all responses make direct reference to the policy or the matter concerned.

Andrew Ashcroft

Independent Examiner

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17 June 2021