

Hunstanton Neighbourhood Development Plan

Responses to Clarification requests from Nigel McGurk BSc. MCD, MBA, MRTPI

Preamble

As noted in paragraph 31, the Town Council decided that the HNDP should focus on housing and that is what the 2016 questionnaire was designed around. Although it expanded into a number of related areas, it did not aim to be comprehensive and did not seek to challenge the Borough's management of the seafront.

There was quite a bit of disappointment from the working party and HTC that some of the comments received during regulation 16 were not made earlier or during the Regulation 14 stage. We have worked very closely and positively with the Borough Council and the planning department when formulating the HNDP and we have always been proactive in addressing any concerns raised. We are very grateful for the constant helpful advice, feedback and support we have received from the borough planning department and the support from the Borough in our regular Borough / Town Council Forum meetings.

Further help and development of the HNDP since regulation 14 was initiated by a NPIERS Health Check for the neighbourhood plan. This process was supported and arranged by the Borough Planning Department and Chris Collision from NPIERS who conducted it. We found the process helpful and used it to develop the HNDP to the stage we are currently at.

In the last few years Hunstanton has seen a considerable increase in its housing stock with over 385 properties being built or under construction at present. (This number only takes into account large projects over 10 dwellings). A further 325 dwellings have been given permission but have not yet commenced. This figure is very likely to increase due to additional proposals within the One Public Estate, Southern Sea Front regeneration plans and town masterplan of 2008 .

The North Norfolk coastal area has seen a significant increase in the cost of housing property prices in North Norfolk (Map2), In addition it is emerging that many of our local parishes either have policies in place or planned as part of their emerging Neighbourhood Plans that will limit second home ownership. Housing has always been of significant focus to the development of the Hunstanton Neighbourhood Plan and our policies have been developed accordingly.

What a developer regards as sustainable is whether he can continue to make money and that differs from the views of conservationists who wish to restrict development and preserve habitats.

We received 13 responses. The one from the Borough Council of King's Lynn and West Norfolk is the most important and detailed response composed by the planning and regeneration officers.

The response lists the various roles that the Council has :- advising and assisting HTC, as the local planning authority, as a landowner, as a manager of open spaces, and its need to use the HNDP in decision making.

They approve of the plan logo giving the plan a community feel. They would wish the justification and evidence for the policies to have more regard for planning issues rather than relying on particular aspirations of the community or survey responses.

They suggest that the Town Centre and Southern Seafront Masterplan of 2008 prepared by Building Design Partnership should be mentioned in para. 31a because it is the overarching framework for regeneration programme. This was removed after advice with knowledge of the planning department after the health check took place – it was one of the action points. Could be added to the end of 31a if needed

The policies start at J1 because letters A to G were used to identify the goals and objectives which are all cross referenced to the policies.

Policy J1 - Fundamentals. - The overall intention of this policy is to ensure that development in Hunstanton respects its surroundings. We think that this should be applicable to advertisements, household extensions or changes of use of existing buildings even if this is on small scale. Development should either enhance the area or support its sustainability.

Policy J2 - Natural Environment. -

Point 1 - It is the natural environment and the relatively pollution free atmosphere that make the area a great tourist attraction as well as a pleasant place to live and work but that environment is fragile and can be damaged by inappropriate development or over usage. The area is downgraded by the litter that inconsiderate visitors leave behind, by the pollution from vehicles and by the footfall along pathways and disturbance of wildlife. It is a delicate balance between access and conservation.

This policy is supported by the evidence collected by the almost adjacent Norfolk Coast AONB and evidence contained in appendix 2 HNPD Hunstanton Green Spaces and Trees Version 3

Economic Impact of Tourism – Norfolk Coast AONB 2017 (Destination Research)

Tourism Benefit & Impacts Analysis in the Norfolk Coast Area of Outstanding Natural Beauty - A Report for the Norfolk Coast Partnership prepared by Scott Wilson (consultants) - May 2006

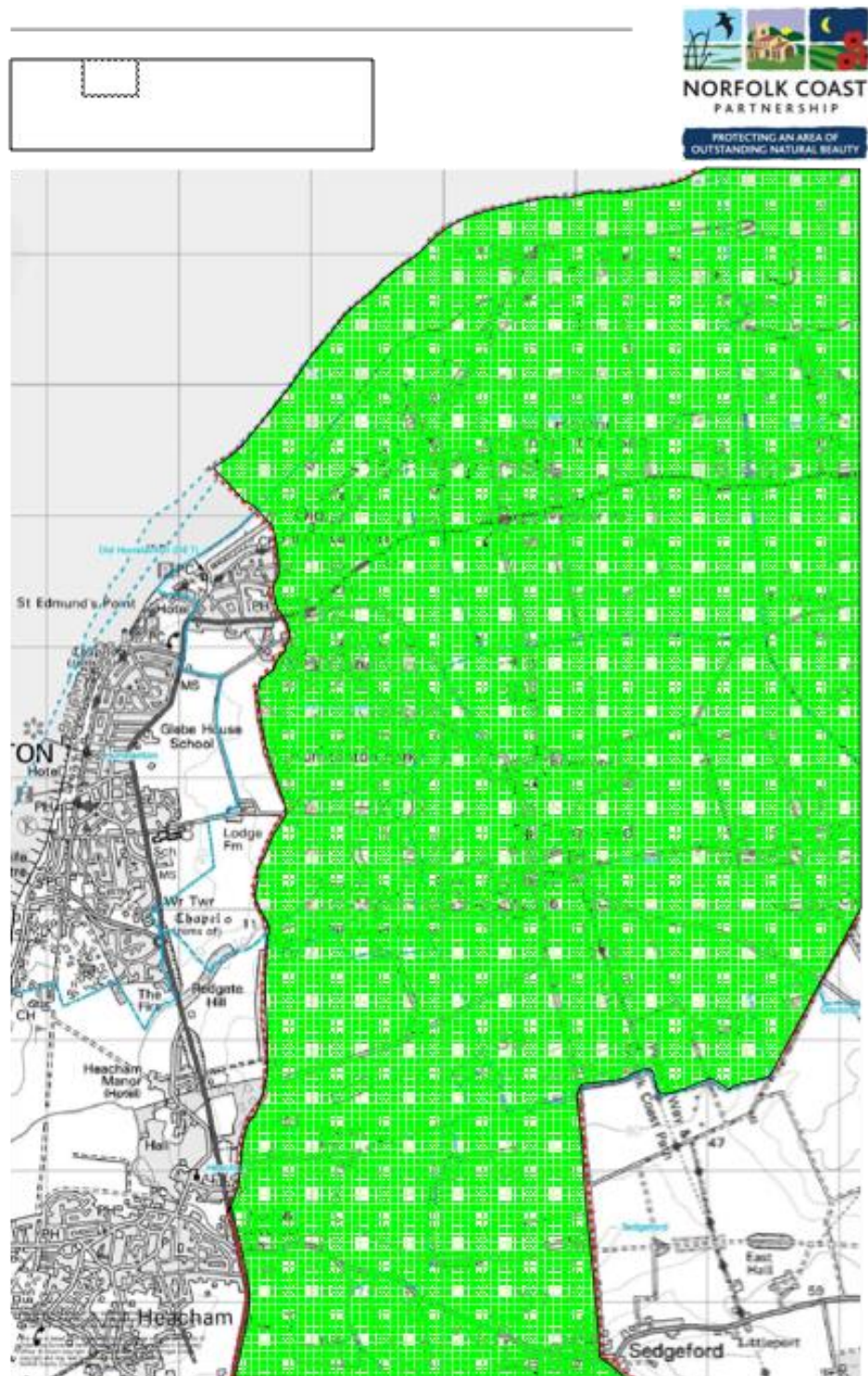
Nature rescue network needed now - Nick Acheson - www.norfolkwildlifetrust.org.uk

Norfolk Biodiversity Information Service. www.nbis.org.uk - Risks to landscape and AONB Habitats and Land use Map 2 Snettisham, to Brancaster 2011.

Point 2 - We suggest replacing the word 'must' with 'should'.

Point 3- Irreplaceable habitats would include ancient hedgerows, woodland or substantial or veteran trees.

Map1 proximity of the Norfolk Coast AONB to the town of Hunstanton.



Policy J3 - Open and Local Green Spaces -

Point 1. Originally the land on which the town developed was owned by the Le Strange Estate. In a Conveyance of 1955 that contained a restrictive covenant for the benefit of the town, the seven parts of The Green became the property of the Hunstanton Urban District Council and passed onto the WNDC in 1974 which became BCKLWN.

(The seven parts are the lower Green including the adjacent promenade, areas in front of and at side of Princess Theatre, Lincoln Square, Upper and Lower Spinney and Le Strange Terrace Garden.

The freehold of the Community Centre field and orchard is in the process of being transferred from BCKLWN to the Town Council.

Appendix 2 contains maps and a description of the significance of each of the areas as well as the trees in those areas..

Map 5 could be extended southwards to cover the Bennett's estate but this is also illustrated on maps 9a and 9b.

NCC Highways have jurisdiction over some of the land adjacent to the roads.

| Area | Freehold | Leased to | In Conservation area | Field in Trust | Significance |
|------------------------------------|-----------------|------------------|-----------------------------|-----------------------|---------------------|
| The Lower Green | BCKLWN | | Yes | QEII | Beauty |
| Associated parts | BCKLWN | | Yes | No | Wildlife |
| The Upper Green | Le Strange | BCKLWN | Yes | QEII | Historic |
| Boston Sensory Gardens | ? BCKLWN | | Yes | No | Biodiversity |
| Esplanade Gdns | BCKLWN | | Yes | QEII | Recreation |
| Cliff Top | BCKLWN | | Yes | No | Leisure area |
| Cliff top car park | Le Strange | BCKLWN | No | No | Tourism |
| Pitch & putt | Le Strange | BCKLWN. | No | No | Recreation |
| Recreation Ground | Le Strange | BCKLWN | No | No | Recreation |
| Community Field and orchard | BCKLWN/H TC | | No | QEII | Wildlife |

| Area | Freehold | Leased to | In Conservation area | Field in Trust | Significance |
|--------------------|------------------------------|--------------|----------------------|----------------|----------------------------------|
| Aspley Cres | BCKLWN | | No | No | Calm, tranquil area |
| Queens Gdns | BCKLWN | | No | No | Calm, tranquil area |
| Old Town Way | BCKLWN | | No | No | Separation from main road |
| Styleman Road | BCKLWN | | No | No | Play area |
| Cemetery | BCKLWN | | No | No | Burial and. reflection |
| Elizabeth Close | BCKLWN | ?Free-bridge | No | No | Play area |
| Bennett's Estate | BCKLWN | | No | No | Nature into residential area |
| Glebe House Sch. | Glebe Sch. Trust/ Le Strange | Glebe H Sch | No | No | Recreation |
| Smithdon High Sch. | NCC | ? | Listed | No | Recreation |
| Hunstanton Primary | NCC | | No | No | Recreation |
| Allotments | Le Strange | HTC | No | No | Recreation |
| Collingwood Rd | BCKLWN | | No | No | Calm, tranquil area |
| Oasis Way | BCKLWN | | No | No | Wild borders to main access road |
| Lincoln Square | BCKLWN | | Yes | QEII | Tranquility |

Point 2. The main land-owners are the BCKLWN and Le Strange Estate who have been consulted directly and via Pigeon Investments.

All landowners invited to comment at regulation 14, BCKLWN have indicated their support for the Green Spaces although they have concerns that their ability to develop on car park areas might be compromised by Policy L6. We have been actively talking to Rob Snowling of Pigeon Investments throughout the process and as a council have fully supported the proposals for the development of a care home and housing on land south of the industrial estate, allocated sites F2.3 /F2.5

Point 3. Objection to Policy K12 Mrs Sheryl Millard makes very valid points. She inherited land in the south eastern corner from her father, the late Mr Michael Huggins. Several years ago, he offered the land to BCKLWN for affordable housing provided that the access road was named Huggins Lane but it was not accepted because access at that time would come off the de-restricted A149. The land was the only piece that was put forward in the town during the 2016 'call for sites'. It is not included in the HNPD as open green space but as part of the separation zone between the town and Heacham.

If we were to promote this development it is likely that a Strategic Habitats Assessment and Strategic Flood risk assessment would be needed. There is no need to include allocated land in the HNPD, hence we propose not to make any changes to plan.

Policy J4. Allotments

Suitable screening would be a physical and visual barrier preferably of a natural variety eg. A hedge with trees.

Growing in the Community 2nd. Edition UK Government 2006. Page 48.

"Good fences or hedges around the boundaries of the allotment site are important to ensure the protection of the plot holders' crops and property, and these should be kept well maintained. Where boundary features (such as hedges) harbour beneficial wildlife, care should be taken to ensure that maintenance practices are appropriate. Consideration should be given to replacing (or augmenting) hard fencing with hedgerow wherever possible as a green, effective and far cheaper alternative."

Policy J5 Community Green Space Design

This is a serious attempt to maintain the open spaces, vistas and green appearance of the town as intended by Henry Le Strange. The policy could not be applied to all development but 10 dwellings seemed to be a reasonable threshold above which a development is considered to be a Major one. British Standards 5837: 2012 gives guidance on the species of trees and the distances at which they should be planted to avoid damage to sewers and foundations

Policy J6.Dark Skies.

We are aware that existing properties can add external lighting without planning consent at present and enforcement may be difficult.

The policy is designed to restrict extraneous lighting coming from new developments because Dark Skies is seen as a very important element of the natural world in this part of Norfolk and the AONB. We have just heard that there are plans to site an observatory near the pitch and putt. "This new observatory will be the first public venue in the community to directly celebrate the superb quality of West Norfolk's famous panoramic skies and its high quality star-gazing offer"

Policy J7 Separation Zones .

It is the wish of HTC and the parishes of Heacham and Old Hunstanton to prevent coalescence and a loss of distinct identities. In comparison to Heacham and Old Hunstanton, the boundary of Hunstanton is quite restrictive so we can only allocate a very small zone on the south side. We do not think that development should go right up to the boundary of the Norfolk Coast AONB on the east side. See map above.

Both Old Hunstanton and Heacham are in the process of preparing Neighbourhood Plans and their proposals match up with this policy. Policy 2 of The Old Hunstanton has a settlement break and map 3 shows that it goes up to the Hunstanton Separation Zone. Policy 17 of the Heacham Plan and figure 13 shows a green settlement break that adjoins the Hunstanton Separation Zone.

[Heacham NP Reg.16 Consultation 2021 - Details - Keystone \(objective.co.uk\) –](#)

[Pre-submission consultation | Old Hunstanton Parish Council \(norfolkparishes.gov.uk\) –](#)

Policy K1. Size and Mix of Housing

Point 1. It is not realistic to suggest a mix of houses with less than 4 houses in a development

Point 2. The NPPF, the Core Strategy and the Site Allocations and Development Management Policies do not at present give the Planning Authority robust reasons to justify refusal of applications to build very large houses which are not suitable for local people and are well out of their price range. A serious mis-match has occurred between what the developers deem to be profitable and what the housing needs are for local people to be able to continue to live and work in the area.

Page 22 Figure 9: Properties council tax bands and number of bedrooms – Ward demographics (8) – This chart gives details of the ward demographics in 2011, 1738 dwellings were 5 bed and over compared with 911 dwellings smaller than 5 bed rooms. The council tax bands supports these findings. The 2011 figures show 1674 properties in Council tax bands A and B, and 1926 in bands C to G. These figures illustrates the imbalance in the housing mix with a significant skew towards the larger properties much of this is a result of Hunstanton being a late Victorian resort town.

NPPF paragraphs 59 to 66 seem to support the creation of this policy. The whole purpose of planning is to attempt to provide the right number of homes of the right type, tenure and size in the right places associated with suitable employment and with adequate infrastructure.

Point 3. - Mr McGirk asks to be pointed to adopted local or national policy that restricts the size of homes / number of bedrooms. Although it does not conflict, it is precisely that lack of definitive policy at national or local level that makes it necessary for this policy to meet the needs of this locality.

Point 4. The Housing White Paper, published in February 2017, proposes that Local Authorities should 'deliver starter homes as part of a mixed package of affordable housing that can respond to local needs and local markets'. The terminology has changed, starter homes are now termed 'first homes'.

Parish demographics show there are areas of significant economic deprivation most notably LSOA 001A. In 2011 32% of that population were unemployed/claiming benefit. In 2019 LSOA 001A was IMD 3212 ranked its IMD decile was 1. <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

Point 5. Sheltered, supported and/or extra care is not necessarily confined to older persons,

Point 6.- This policy was inspired by the Brancaster Neighbourhood Plan which faced similar problems to our locality. Their plan came into force in November 2015. Because developers had found loopholes, it was necessary to review it and the new version was examined and replaced the original in February 2021.

Point 7. The local authority's housing assessments have concluded that the need in this area is primarily for 2 and 3 bedroom homes and some 1 and 4 bedroom ones. HTC recognises that some residents may wish to extend their homes so that they have 5 or more bedrooms and perhaps use one as an office / study. We do not think that compelling them to move house or to leave the area and leave their friends and neighbours is appropriate particularly if they have been living in the area for at least 5 years.

Point 8. Much of the existing housing stock particularly in the conservation area dates from late Victorian and Edwardian ages, this housing stock is generally 5 or more bedrooms. In the surrounding area there are many properties of this size or greater. It is important that there is a demand for these more historic homes as it will ensure their maintenance and long term stewardship.

Page 22 Figure 9: Properties council tax bands and number of bedrooms – Ward demographics (8) – This chart gives details of the ward demographics in 2011, 1738 dwellings were 5 bed and over compared with 911 dwellings smaller than 5 bed rooms. The council tax bands supports these findings. The 2011 figures show 1674 properties in Council tax bands A and B, and 1926 in bands C to G. These figures illustrate the imbalance in the housing mix with a significant skew towards the larger properties much of this is a result of Hunstanton being a late Victorian resort town.

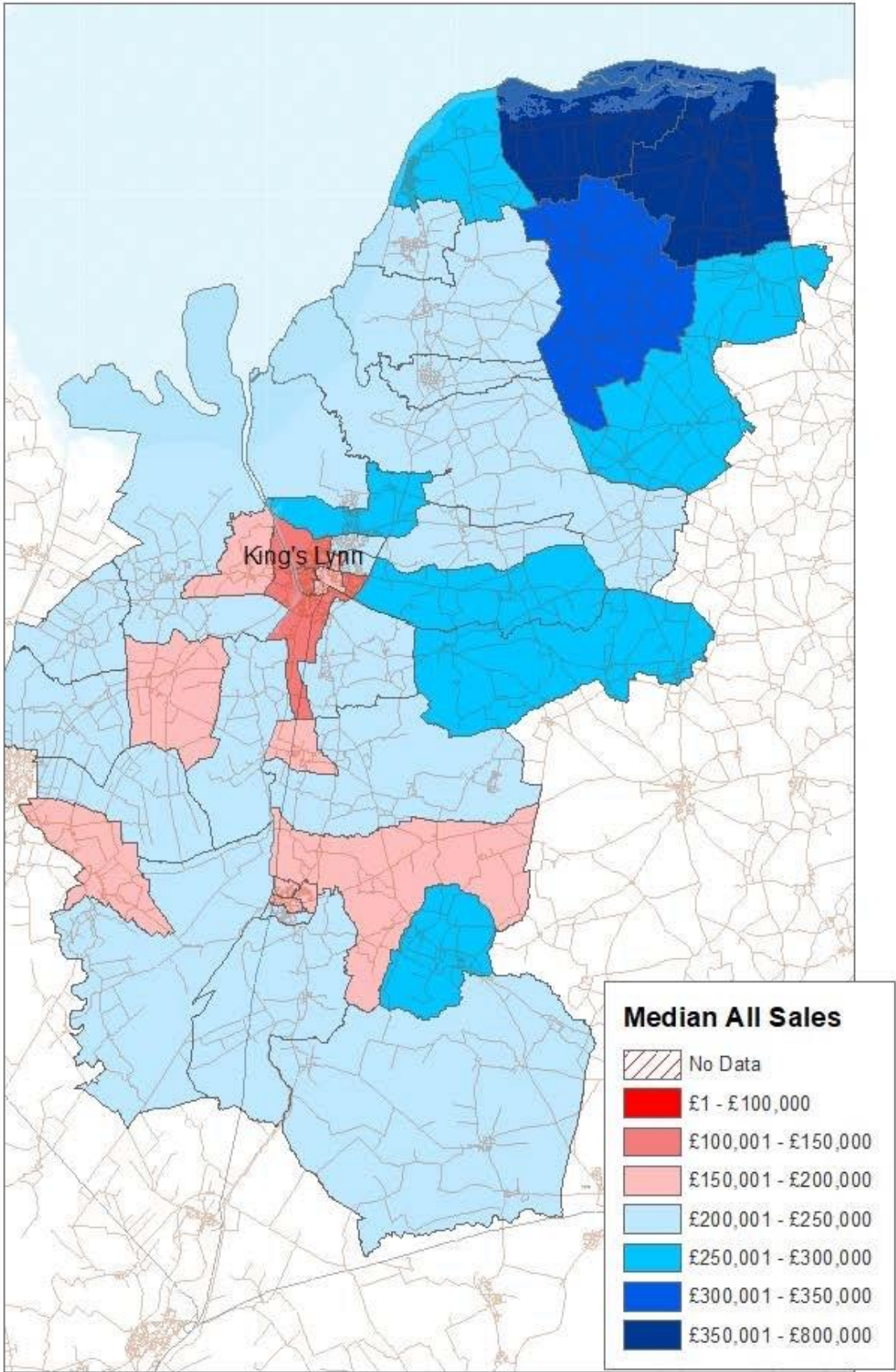
NPPF para 61 requires "... the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes".

Point 9. Whilst very large houses are unsuitable for local residences, the smaller homes that we wish to see may still be quite suitable as second or holiday homes. To avoid a potential conflict with policy K11, HTC would wish to remove reference to holiday homes in the justification and evidence section.

Point 10. Map 2 below shows the variations in the cost of housing across the Borough and illustrates that there is some variation, with prices generally slightly cheaper around King's Lynn, and the most expensive areas being the north of the Borough, especially on the coast. These higher value areas are within an Area of Outstanding Natural Beauty (AONB) and are frequently sought after by people looking to retire or acquire a second home in the area.

Point 11. - Many planning applications are designed to enlarge existing accommodation. This enlargement increase the value and reduces the affordability. A property at 27 Kings Road went from a modest 3 bedroom chalet bungalow into a 7 bedroom house.

Map 2– Housing prices in North Norfolk



This data covers transactions received at Land Registry from 01/01/18 to 25/06/2019
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Map 2 shows the variation in property prices across the Borough - median prices between January 2018 and June 2019. - published in Residential Needs Assessment 2020.

Hunstanton has areas of deprivation as well as affluent areas, some of which relate more closely to North Norfolk than to the King's Lynn and West Norfolk Borough as a whole.

Right Move suggests that the average house price in the town in 2020 was £283,076 with detached properties selling for £380,258, semis for £221,188 and flats for £ 209,988. The prices in the Borough for 2018 are average £ 213,422, detached £ 314,902, semi £ 204, 252 and flat £ 144,820

Policy K2 - Design, Style and Materials

Point 1. The overall intent of the Policy is to promote good design for all development. The general intent of the policy is to encourage development to consider all the aspects set out but not an absolute requirement.

'Streets for all' promotes better design for a better balance of the movement of goods and people.

Point 2. 'Blend in' is effectively the same as "respect". There is no wish for a new or replacement property to blend in with a poor quality neighbour.

Point 3. In the town centre there are many Victorian or Edwardian building that have the appearance of being 3 or 4 storeys high as illustrated in the Conservation Area appraisal but outside the central area (or outside the Conservation area) large areas are one or two storeys and in the Bennetts estate they are solely bungalows. https://www.west-norfolk.gov.uk/downloads/download/325/conservation_areas_documents

Point 4. "If extra living space is needed, it should be obtained by putting rooms in the roof" is merely a way of increasing the living space without significantly altering the external appearance of the building. <https://www.ratedpeople.com/blog/make-the-most-of-existing-space-without-extending>

Point 5. Perhaps an Article 4 directive is needed to prevent permitted development rights being exercised without planning consent.

Point 6. The introduction of the Hunstanton Conservation Area character statement says "The quality and interest of a conservation area depends upon a combination of a number of factors including the relationship and architectural quality of buildings, materials, spaces, trees and other landscape features , **together with views into and out of the area.**

https://www.west-norfolk.gov.uk/downloads/download/325/conservation_areas_documents

Point 7. We do not wish to identify specific views but the town was originally laid out so that there were plenty of open vistas and in particular views of the seashore and we wish to preserve that characteristic.

Policy K3 Footprint of Buildings

Point 1. - Again this is a policy that was inspired by the Brancaster Neighbourhood Plan which has been reinforced during the recent review.

This policy ensures the character and nature of properties in terms of size are retained within Hunstanton, it provides a benchmark for Garden Infill development proposals policy K6

Point 2. Inspection of large scale Ordnance Survey maps suggests that most of the properties in the residential area of the town would be within the 50% plot size limit. There are commercial properties in the town centre that do not comply. There are some residential streets - Victoria Avenue, York Avenue and Glebe Avenue that do not have sufficient garden space to function as satisfactory family homes. Many residents in those Avenues have allotments. Elderly people's homes in Orchard Close and Nursery Drive do not comply with a 50% plot size but that is probably not inappropriate.

Point 3. It is hoped that most homes to be built will be for families that that these will need space for children to play, space for washing to dry and perhaps space to grow flowers and vegetables. Such garden space is an important factor in biodiversity.

Point 4. It is certainly not the intention of the HNBP to give less protection to the heritage assets that we very much value.

Policy K5 -Affordable Housing.

We support the principle of pepper potting affordable homes within developments and 'small groups' would be about four. The grouping of **up to 4** affordable homes seems to work in recent developments. Residents in the affordable homes feel they have neighbours who have a similar affinity. In this way we prevent developments that have all the affordable housing in one large cluster .

Policy K6 - Infill Developments

Point 1. The Neighbourhood Plan does not wish to promote development of gardens but seeks to permit them in certain circumstances, one of which would be that the result would be within the 50% limit of policy K3.

Point 2. According to Google 'Infill' is the development of vacant or under-used parcels of land within an urban area. See LP 26 of emerging local plan.

Policy K7 - Parking Provision -

Point 1. Our policy purposely removes the flexibility from the Borough's DM17 that can and has been applied in main towns. Some of the Borough officers do not appreciate that public transport provision in Hunstanton is not good enough. The SADMP para F2.5 and the emerging Local Plan(10.2.6) states that "There is a regular bus service to King's Lynn, surrounding villages , and also along the Norfolk Coast"

Policy LP40 - Hunstanton Policy point 6 states. "Improvements to public transport; increasing the frequency and reducing journey times of services to King's Lynn; supporting more frequent services along the coast; and strengthening public transport links within rural areas"

Currently (10.2.6) is simply untrue but our efforts to correct this have not succeeded.

Point 2. The Coast Liner No 36 service is reduced to 2 hourly on Sundays and Public Holidays and in winter. There is a 3 or 4 bus per hour service during office hours to King's

Lynn but it does not start early enough or finish late enough to enable users to take advantage of many employment opportunities. Most full time work is out of the town.

Point 3. Because of the flexibility of DM17, planning applications to develop the former Kit Kat site, the former Witley Press site and the bus station / library area have been approved with less than the recommended parking provision. In contrast a large development south of the Parkway in King's Lynn had an over provision of spaces despite it being relatively close to the town centre, the railway station, the hospital and Hardwick Industrial and super market area.

Point 4. Properties in the central area and in the Avenues were built before the motor car became an important consideration. They do not have garages or off road parking areas. The congestion on these roads increases in the summer when visitors attempt to park there as well as local people.

Point 5. In the Local Plan there are two main towns designated Hunstanton and Downham Market. In terms of public transport provision they are chalk and cheese (main town status is often quoted as a reason for the relaxed attitude to DM17). Downham Market has greater provision of bus transport and a train connection to a main town (Kings Lynn) and quick connections to major cities (Cambridge and London). From Hunstanton the time taken by public transport or even car to our nearest major city (Norwich) is longer than it would take to get from Downham Market to London.

Point 6. In relation to local plan Policy LP40 - Hunstanton Policy point 6 The recent loss of the Bus Station (OPE) to a planning development for flats has reduced the ability to meet this objective. The loss of the Bus Station with capacity for multiple buses off the public highway to just two bus stops (on the public highway) has reduced the ability to achieve this aim. By ensuring the parking provision in policy K7 (until such time as transport provision /connectivity) is improved/implemented this policy ensures the viability and sustainability of the town.

Point 7. Hunstanton is relatively hilly and is remote (16 miles to the nearest main town (Kings Lynn) The use of sustainable alternatives to the motor car, the bicycle or walking, is very limited. You certainly cannot get all you need to have in order live locally, lockdown made this crystal clear. Until improvements occur the importance of DM17 being applied to all developments and hence the implementation of HNBP Policy K7 to local residents and businesses cannot be understated.

The government's stated aim of banning the sales of petrol and diesel powered cars by 2030 makes this policy much more environmentally sustainable in the long term.

We believe policy K7 is needed, until such time connectivity from improved public transport provision and sustainable transport options can be improved to meet the residential and economic needs of the town.

Policy K8 – Off Road Parking - Could be renamed to electric vehicle charging

Policy K11 - Principal Residence -

Point 1. Principal residence was a policy that was first introduced in St Ives, Cornwall. There is some evidence that its introduction initially deterred developers but as more surrounding neighbourhood plans also incorporated a similar policy and it was backed by Cornwall County Council, it is no longer thought to be detrimental to the economy. Quite the opposite. The fact that homes that are empty for significant periods of the year, is harmful to the economy and social cohesion of the area.

Point 2. Policy K11 requires all new developments to have the requirement to be sold with a principal residency stipulation for the occupier. The reasons for the implementation of this policy is specific to the economic needs of Hunstanton. We hope to show in these comments why it is needed and essential to the viability/sustainability of the town.

Point 3. The ability to purchase a Home in Hunstanton is decreasing as house prices increase (map 2 house prices in Norfolk). Using the website Rightmove <https://www.rightmove.co.uk/house-prices/hunstanton.html>, which has validity as it uses Land registry data (last updated June 2021), it shows that house prices have risen 19% over the last year. The average property price overall was £380,258. Flats sold for an average of £217,066, with semi-detached properties fetching £226,846.

The affordability of a mortgage for local people is ever decreasing. Data with the information on qualification level as an indicator of potential earnings (Figure 6: Qualification distribution in percent – Parish demographics 5 p10 HNPD) suggests low qualification levels, which affects income. Hunstanton forms the boundary of the Norfolk Coastal AONB. Using their data as the nearest comparable area (qualification levels and house prices please refer again to map 2). Using this data we get average income of £28000 pa annum. Within these figures up to 40% of the population earn an average of £20000pa. <http://www.norfolkcoastaonb.org.uk/mediaps/pdfuploads/pd000115.pdf>

Point 4. Although parishes along the North Norfolk Coast have a higher proportion of second or holiday homes, **Hunstanton contains 571 non-principal (second) homes, the largest number in the whole borough, and that figure is increasing.** These homes remain empty for several months of the year and damage the sense of community with the area. The feeling of isolation and remoteness that high levels of second home can have on a community, where homes are left empty for large parts of the year is already affecting residents in areas of high second home ownership. This was noted more widely across the area during the Covid lockdowns.

Point 5. The increase in the second home market is becoming more and more pronounced. When homes come on the market (new and existing housing stock) a significant proportion become second homes and, while recent specific numbers are difficult to generate, Map 3 highlights the significant proportion of second homes in the area in 2016. Certainly, from the experience of the neighbourhood plan WP members, there is a quite large increase in second homes since this data was collated. The market is skewed and much of the existing housing stock is biased towards larger homes (see fig 8, p22), and comments to our response to policy K1 reinforce this. To summarise, the market is skewed quite significantly towards larger homes, while the need is for more affordable smaller family homes that residents can afford, if living in Hunstanton is going to be sustainable for them.

Point 6. The aim of the policy is to dampen the demand for new second homes from non-principal residents to ensure that new house prices for residents remain sustainable and affordable. There is a need to increase the mixture of the housing stock (recognised by the

borough council within the emerging local plan) to provide more smaller properties. There may be concerns that this policy will affect the viability of development and cause a drop in the viability of development. It is also suggested this restriction may drop one 'value zone' for both CIL and levels of affordable housing. This means that less affordable housing may be delivered within the NDP Area and CIL receipts may be lower. Hunstanton has had one recent major development that has included principal residency and affordable housing (see comments on Southend Road below) as a key aspect and plans for more affordable homes are at an advanced stage.

This is supported by comments made by Cornwall County Council in the following
*<https://www.cornwall.gov.uk/media/nt5c5jcl/principal-residence-policies.pdf>

Point 7. This pressure on housing and the imbalance that the second homes causes to the market is great and this is reflected in the recent increase in house prices (as shown in Map 2 House prices in Norfolk). Map 3 shows the proportion of empty and second homes and figure 4.3: Kings Lynn and West Norfolk second and empty home percentages.

Point 8. The expectation is that this pressure on the housing market will increase, with second home demand being a major factor, if we do not do something about it. Most of our neighbouring parishes have principal residence policies within their emerging neighbourhood plans, and two local parishes (Brancaster and Sedgeford) already have policies in place. It was considered by the HNPD WP that this harm from an uncontrolled second home market will continue unabated if no such restriction is imposed to prevent the use and occupation of new homes by a market skewed by second home and holiday home market. If we don't have a policy in place development in Hunstanton would not become sustainable.

Point 9. Recent planning proposals by the borough council for dwellings on the Southend Road Car park (21/00243_FM) were refused in December 2020 and were only passed by the planning committee in April 2021 with the condition that they be sold with a legal covenant that occupiers must be principal residents. The terms of principal residency requirements for this development should provide a template for others.

Point 10. Without affordable accommodation, key workers have to migrate away from the local area. Businesses and local services are also under pressure as local people who run these small businesses also cannot afford to purchase property locally. Hunstanton is losing its key and often low paid workers who have to move out of the area to live in cheaper areas. Many of these will find homes in our nearest main town, Kings Lynn, (as a more affordable area – see Map 2) the problem arises that these homes are a considerable distance (16 plus miles) from Hunstanton and Public transport out of office hours is poor and at times non-existent (<https://www.lynxbus.co.uk/bus-routes/343536/34/>).

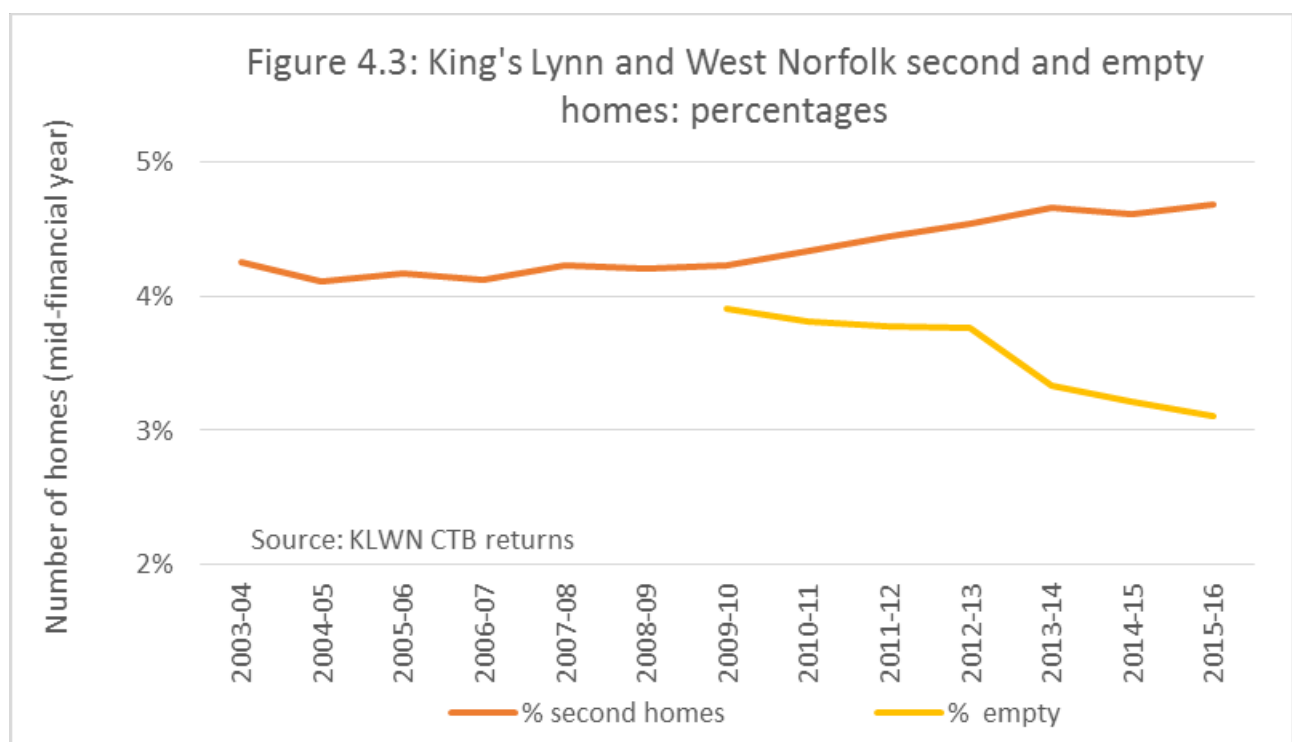
The inevitable result will be a loss of key workers and businesses from Hunstanton. In the long term this may very well affect the sustainability and viability of the town. It is already difficult to recruit volunteers to man the lifeboat and fire and coast guard services.

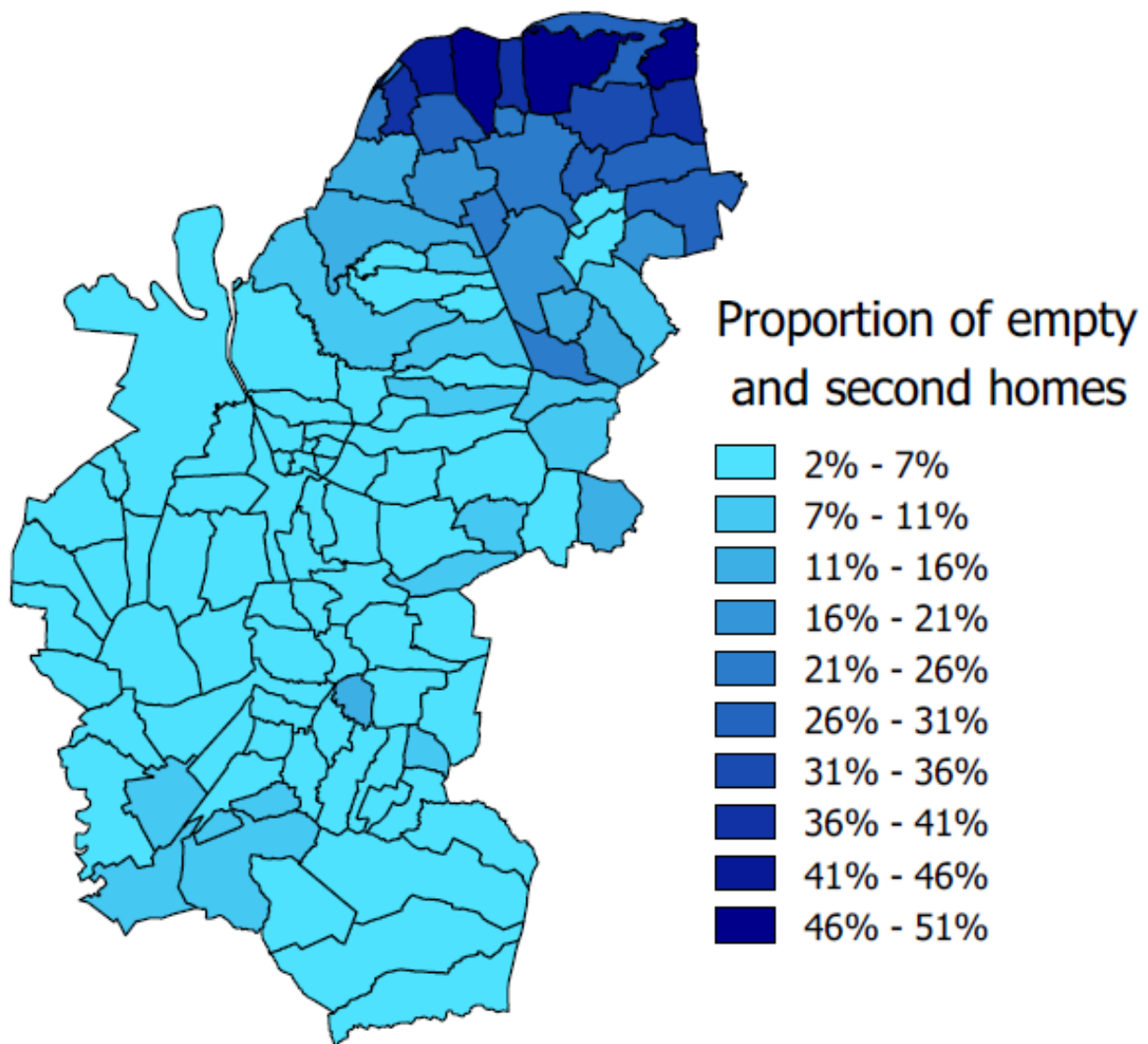
As a working party and a Council we believe that bringing in policies K1 and K11 are essential to ensure the sustainability and future of the town for local residents and businesses. The initial signs from (local) Brancaster and Sedgeford local plans who have implemented principal residence policies has been positive, with Brancaster tightening up many policies from those originally specified to ensure developer compliance and a healthy and a sustainable community.

Point 11. If the neighbourhood plan is passed at referendum, it is the intention that its effects will be closely monitored in relation to the emerging local plan and possible changes to national planning policy. We intend to carry on with our positive relationship with the Borough Council and its planning department.

Point 12. Considering all the points above, we can see that home ownership for residents is becoming increasingly unaffordable, and the sustainability and viability of the Town is threatened. We as a working party believe this policy addresses many of the issues without economic penalty. As such this policy meets the Basic Conditions requirements, particularly having regard to the NPPF –“delivering quality homes” and “delivering sustainable development” within Hunstanton. We believe for the reasons mentioned in our comments it also meets the requirements of the Human Rights Act 1988 and other European Legislation.

Point 13. We are not aware that a local exceptions policy can apply to the town of Hunstanton.





Map 3- Assessing King's Lynn and West Norfolk's Housing Requirement (Neil McDonald, October 2016)

Policy L1 Development of Shops, Workshops and Businesses. -

The intention of the policy is not to permit commercial development anywhere. We would agree that some further qualification is needed to limit commercial development. The same provisos of K6 a, b, c and d could be added. If that was done it could make Policy L2 redundant.

Policy L2 -Employment and Access

This may not be deliverable. see L1 above.

Policy L3 - Location in or near Town Centre

Point 1. In common with many town centres, there is potential for residential accommodation to be developed on the upper floors above retail premises although it has to comply with various building regulations regarding noise, smell and fire safety. This is what we wish to support.

Point 2 . McCarthy and Stone have built Hamon Court. Approval has been given for the present bus station and library area to have flats built upon it and the former Witley Press is to be developed for flats. We do not envisage further purely residential developments within the town centre because of congestion and parking difficulties - see Policy K7.

Point 3. I cannot find an NPPF reference to 'overly dense'
The justification and evidence section needs to clarify that Hunstanton is defined as a main town in CS02. Change map reference to page 43.

Point 4. . We think that guidance "Effective use of land" is just that and has less status than adopted land planning policies.

Policy L4 - Home Working

'small scale' employment implies that a room in a home might be converted to an office or a garage converted to a workshop or a shed in the garden might be so used. Such employment would be for the householder and partner and perhaps one other.

Policy L5 - Mobile Phone and Broadband

New housing or business premises and conversions would be expected to have good broadband connectivity. Does not apply to advertisements.
Research commissioned by DCMS projects that fast broadband could add £17bn to the UK's annual GVA by 2024. Economic and Social Research Council
Should be made a planning condition.

Policy L6 - Provision of Car Parking Areas.

Point 1. This policy does not conflict with the Borough's policies but recent OPE (One Public Estate developments have. The emerging Local plan also includes the following statement (10.2.1 point 6) "Ensure that the transport and movement strategy for the town includes:

-Securing the provision of adequate levels of parking in the town as a whole, particularly during the summer months.

-Improvements to public transport; increasing the frequency and reducing journey times of services to King's Lynn; supporting more frequent services along the coast; and strengthening public transport links within rural areas"

The recent application to build on part of the Southend Road car park as part of the OPE proposals was approved which entails the loss of 100 car park spaces, some of which was partially offset by a proposal to use the coach park more flexibly. The redevelopment of the bus station / library area also means a loss of car park spaces in the Central car park and of course reduces the ability to meet this objective, we feel our policy L6 will help to achieve to achieve this policy and secure the economic sustainability of the Town , commerce, tourists and residents.

Car parking is an essential need for a town that not only serves as a tourist destination but also as the local and essential service hub for surrounding parishes/ communities. (Kings Lynn being at least 16 miles away)

Point 2. Although Dr Richard Beeching recommended investment in the train line, it was closed in 1969.

Point 3. The town has become highly dependent on the tourism industry. Visitors require parking spaces near to their intended destination, the fun fair, the sea front, the beach. Although a Park & Ride service has been suggested and there is a campaign to re-instate a railway, the town's present car parks have been described by design guru Wayne Hemingway as the town's crown jewels. The remoteness of the area means that cycling is only suitable for local journeys, the nearest main town is 16 hilly miles away.

Point 4. Were a Park & Ride service to be introduced or a re-instatement of the railway, it could be demonstrated that the retention of car park spaces was not essential. Clause (c) is designed to raise the bar to a high level - ie exceptional circumstances, clearly demonstrated, significant social and /or economic benefits to the town.

Policy M1 Education and Care Provision

Point 1. - What the significant impact could be depends on the type of properties that are proposed. If they are to be family homes this will impact on education provision whereas if they are to be homes for the elderly, the impact will be on the health services.

Point 2. The main reason why local people are opposed to more development in the area is the difficulty of getting an appointment at the local General Practice surgery or dental surgery. This is a long standing problem aggravated by Covid-19.

Point 3. It is recognised that the Borough Council do not have direct control over the provision of health and educational facilities.

Point 4. Hunstanton already has a very skewed age distribution with 43% of the population over the age of 65 years. The Journal of Public Health has just published an article "Averting a public health crisis in England's coastal communities by Professor Sheena Asthana and Alan Gibson of the Plymouth Institute of Health and Care Research. The article demonstrates that rather than there being a north south divide, there is one between the central area and the periphery. Coastal areas have a higher prevalence of coronary heart disease, diabetes, COPD, mental health problems, and long standing health problems. In addition to a higher admission rate for self harm (10-24), drug related (<18) and alcohol related (<18) as well as a lower participation in higher education. **The coastal areas are relatively under funded to deal with the problems.**

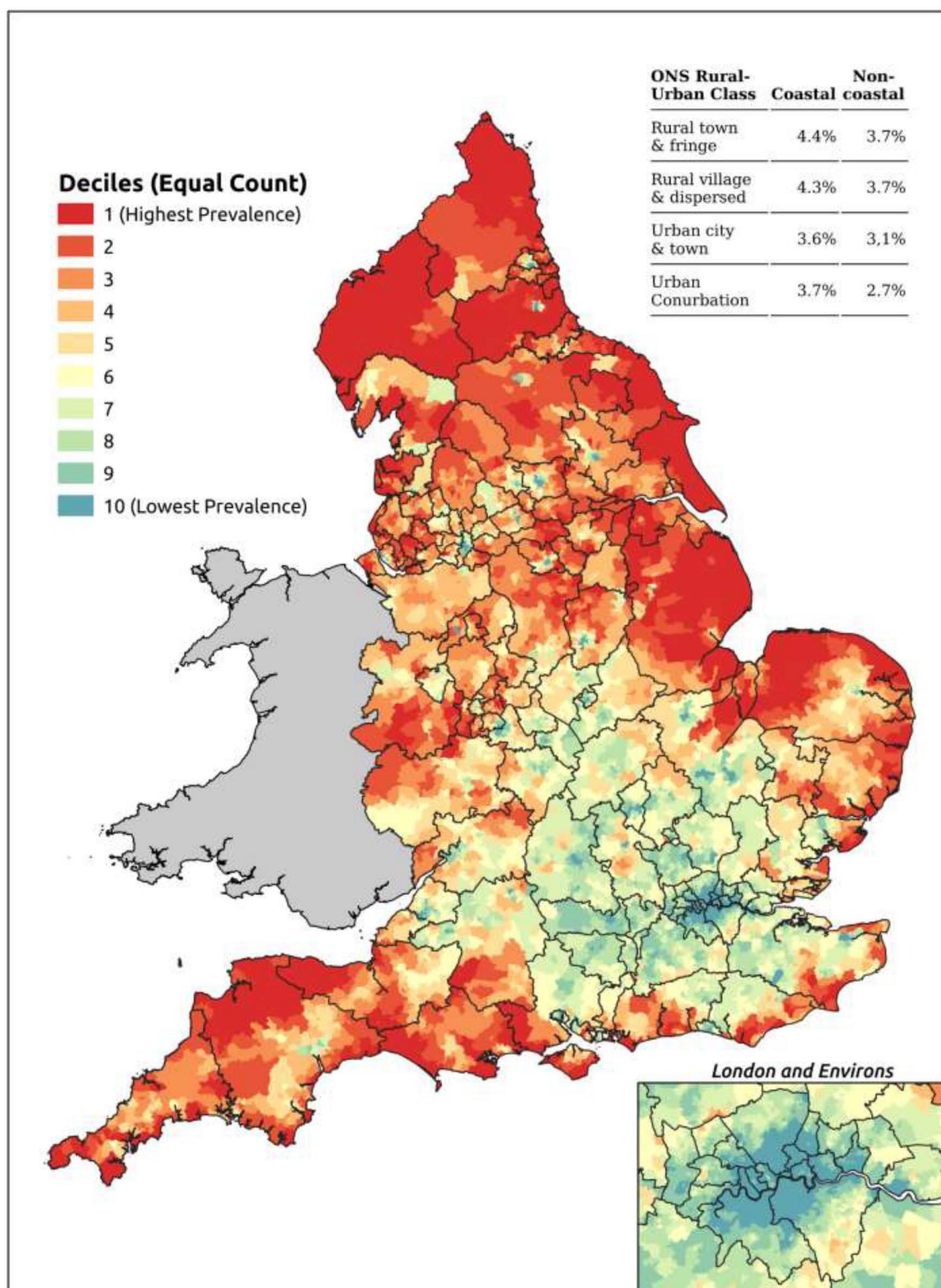


Fig. 1 Coronary heart disease, QOF prevalence (LSOAs), 2014/15–2018/19. All maps based on digital boundaries obtained via the ONS Open Geography Portal (<https://geoportal.statistics.gov.uk/>). Source: Office for National Statistics licensed under the Open Government Licence v.3.0. Contains OS data © Crown copyright and database right [2021]. Specifically: *Lower Layer Super Output Areas (December 2011) Boundaries Generalised*

Clipped (BGC) EW V3. [Online. Accessed 20/02/2021] (<https://geoportal.statistics.gov.uk/datasets/lower-layer-super-output-areas-december-2011-boundaries-generalised-clipped-bgc-ew-v3>); *Clinical Commissioning Groups (April 2020) EN BFC V2*. [Online. Accessed 20/02/2021] (<https://geoportal.statistics.gov.uk/datasets/clinical-commissioning-groups-april-2020-en-bfc-v2>); *Countries (December 2011) Boundaries EW BGC*. [Online. Accessed 20/02/2021] (<https://geoportal.statistics.gov.uk/datasets/countries-december-2011-boundaries-ew-bgc>).

Some of the current and future demand is described in the Housing Needs Assessment of 2020 produced by HDH Planning and Development limited - 118 pages which will guide the emerging local plan to 2036.

In terms of specialist dwellings for older persons (Class C3), it is evidenced that in King's Lynn & West Norfolk an additional 2,948 additional specialist units should be provided through to 2041, consisting of 1,839 units of sheltered housing, 1,009 units of extra care and enhanced sheltered housing, and 100 units of dementia care housing. Chapter 6 also identifies that there will be an additional 836 Registered Care spaces (nursing and residential care homes) will be required over the next 20 years in King's Lynn & West Norfolk. Residential Needs Assessment 2020.

Policy M3 – Protection of Local Community Facilities -

We consider all the Community assets on pages 50 and 51 to be viable and necessary but if in the future such asset was being used on only rare occasions, it would be up to the owner to demonstrate that it was no longer viable or necessary. The options would be to a) close it down, b) demolish it, c) apply for a change of use.

| Community Facilities | Used by |
|----------------------------------|---|
| 1. Places of worship | Religious congregations |
| 2. Educational Facilities | Children - (Smithdon no longer has VI form) |
| 3. Admin & Services | Support local population and visitors |
| 4. Health facilities | Support local population and visitors |
| 5. Community Centre | Community group meetings and leisure |
| 6. Sports Facilities | Support local population and visitors |
| 7. Social Venues | Meeting places for members |

| Community Facilities | Used by |
|---|---|
| 8. Open spaces Play areas x 3 Pitch & putt, esplanade gardens Allotments Car park areas Green areas within residential areas or adjacent to roads Cemetery | Children's play, residents and visitors Facilities for residents and visitors Membership club Facilities for visitors Parts of open green aspects of town, may be under control of NCC highways. Calming aspects Brings nature into housing areas Essential burial and reflection space |
| 9. Notable buildings | Support local population and visitors |
| 10. Public toilets | Support local population and visitors |
| 11. Library | Support local population and visitors |
| 12. Tourist attractions | Entertainment for visitors, support economy |

Comments with reference to other Regulation 16 responses

1. Kings Lynn Internal Drainage Board – South Beach Road and part of the caravan park and car park leading off it, Searle's and the west side of Manor Park comes within the remit of the drainage board.. Their permission would be required for a development to discharge surface water or foul water or for works within 9 meters of a watercourse. Perhaps add reference to para 31a.
2. Norfolk Gardens Trust- They note that several open spaces listed have heritage value and are protected by being in Conservation Area. They have no concerns about the plan. – No response needed.
3. Marine Management Organisation - Their boundary extends to mean high water spring tides mark. The East Inshore and East Offshore Marine Plans could be added to other plans mentioned in para 31a but none of the policies relate to the seashore or coastline.
4. Historic England - They did not wish to provide detailed comments at the present time.
5. Environment Agency - Some of the Southern part of the town is below the 5m. Contour line and therefore subject to potential flooding. Development and residency in South Beach Road is constrained by DM17 - Flood Hazard Zone. Our plan promotes biodiversity.
6. Highway England – nearest trunk road managed by Highways England is the A47. The A149 is noted in the Borough's Local Plan as a strategic road. No action needed.

7. Norfolk County Council - Considers that the Historic Environment is only sparsely mentioned in the plan and recommend that the Norfolk Historic Environment Record is consulted and that a local list of heritage assets needing protection should be prepared. A new paragraph 12a indicating a number of archaeological finds on Oasis Way. The NHER contains 288 items in Hunstanton and Old Hunstanton.

The historic remains of the 19th. 20th. Century development as a seaside resort should be preserved. These are mainly within the Conservation area therefore protected.

NCC is the Lead Local Flood Authority. Previously they recommended that Policy K10 should be enhanced but it has now been omitted. NCC is now responsible for groundwater flood control.

Members mentioned that surface water flooding had occurred at the bottom of Park Road and that some houses in Southend Road had had their cellars pumped out.

8. National Grid - no record of National Grid high voltage lines or high pressure gas pipelines within area. Members thought that there was a gas pumping station in Chapel Bank and a number of pipelines in the area but perhaps not high pressure ones.

9. Objection to Policy K12 from Sheryl Millard. - See below Policy J3 point 3.

11. Holme NP – Very supportive. Re K3 and K6 An existing property could not develop over 50% of its footprint. Could we research second home ownership on f2.2 and f 2.4 as requested? Might be interesting information.

Re L5. We may have to accept some masts in order to get good signals

12. Theatre – agreed with all comments

13. Pigeon Investment Management – Good news that new care home provider has been engaged to develop, comments about SADMP plans to be included it was but we were told to remove. Buffer zone – discussion with range of parties determined that this was a sensible solution considering our boundaries face an AONB. Landowners were asked to take part in consultations.

Suggested changes to HNDP

Remove references to discarded Policies - J8 Renewable Energy, K4 Footprint of Redeveloped/ extended properties, K9 Custom and Self build, K10 Flooding and drainage, K12 allocation of land, probably L2 employment and access, M2 use of CIL moneys.

P 3. Map 9a on page 46 and 9b on 47

P7. Add a paragraph 12a to mention the archaeological findings at Oasis Way and 280 records in the Norfolk Historic Environment Record

P18 expand para 31a to include reference to Town Centre and Southern Seafront Master-plan by Building Design Partnership 2008; King's Lynn Internal Drainage Board; East -onshore and East offshore Marine Plans.

P22. Change rooms to Bedrooms

P30. Change 'must' to 'should' in Policy J2

P36. Remove sentence about holiday homes from the justification and evidence

P40. Change title of Policy K8 to Electric vehicle charging

P42. Expand policy L1 with the sub clauses a, b, c and d of Policy K7.

Delete Policy L2 but add its justification and evidence to L1.

P43. Change Map 8 on page 43.

P48. Policy M3 - change 'big town' to 'main town'

P49 change appendix to appendix 1, Lincoln sq is duplicated,
Recreation Ground is not in conservation area.