

Updated LBCKL&WN Local Plan Review Sustainability Appraisal Documents

Comments from Holme-next-the-Sea Parish Council

Holme-next-the-Sea Parish Council (the PC) has the following comments to make on the revised Sustainability documents.

The PC has commented throughout the Plan Review process both formally and informally at public participation meetings and discussions with the BC's Policy Team.

Our last set of comments (attached) raised the following concerns which are relevant to the SA:

1. The village development boundary map is missing from the Plan
2. There is a paragraph heading referring to Holme-next-the-Sea with no associated text
3. Para 15.0.6 refers to a referendum which had already taken place....

Our representation included a proposed alteration (see attached). This text was designed to correct errors and omissions in the Pre-Submission Plan and also to address the sustainability issues that the PC raised in its response to the 2019 Local Plan consultation.

We understand from discussions with the Planning Policy Officer that a new Section 15.0.5 was included before submitting the Plan for examination (but the PC has not had sight of the content). However, we also understand that a part of the PC's proposed alteration text would constitute a 'main modification' to the Plan which has not been included and will be considered by the Inspectors.

If the proposed alteration is accepted then from the PC's perspective the SA presents a reasonable view of the sustainability credentials of the proposed Local Plan. If it is not accepted – then it raises concerns about the sustainability credentials of the policies listed in Section 7 of the attached 'Local Plan Review 2021' form and is one of the reasons why we wish to participate in the oral examination of these policies. It should be noted that these concerns extend beyond Holme and relate to the sustainability of the proposed Local Plan with respect to its treatment of the wider Coastal Communities of West Norfolk and the problems they face in relation to pressure from tourism, second homes and housing development, climate change and sea level rise, declining biodiversity, dwindling resident populations, traffic and pollution.

Given the economic importance of these communities and their environment to the Borough, the Plan's sustainability score could be increased substantially by having an explicit policy that addresses these issues. In the absence of such a policy the only way they can be addressed is via Neighbourhood Plans and the Local Plan should therefore give unequivocal support to NDPs in the way we have proposed (proposed mods to para 15.01-15.04) or these problems will not be addressed - et alone resolved.

There is ample evidence that these problems are very real and despite public consultation they appear to have fallen under the radar of the scoping exercises. The oral examination appears to be the last opportunity to address these basic sustainability issues. The SA, in its current form, scores what's there – not what's missing from the proposed Plan.



**Holme-next-the-Sea Parish
Council**

[Neighbourhood Plan Website](#)

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