

King's Lynn & West Norfolk Local Plan Review 2016-36

Holme-next-the-Sea Parish Council Position Statement

MATTER 2 SPATIAL STRATEGY

1 Introduction

1.1.1 The Parish Council (PC) has made representations at previous stages in the development of the Plan. At Regulation 19 we expressed concern about the complexity of the process and requested the right to participate in the hearing in the event that any (proposed) future changes carried implications for our Neighbourhood Plan.

1.1.2 The publication of the Examination Library Index has confirmed that a number of (possible/proposed) changes do carry such implications and so we would like to participate in discussion of the relevant topics.

1.1.3 We are also submitting position statements to address three topics that are now of particular concern as follows:

- Consultation (MIQ 7)
- Development Boundaries (Part 1, MIQ 45 et seq which is closely related to Part 2, MIQ 354 Residential Development Reasonably Related to Existing Settlements)
- Touring & Permanent Holiday Sites (MIQ 66 et Seq)

This document deals with Spatial Strategy Issues.

2 Development Boundaries (LP04)

2.1.1 As far as Holme-next-the-Sea is concerned the boundary shown on the revised Policies map is correct. This boundary is the result of extensive consultation with the local community and the Statutory Consultees. It was designed to accommodate a level of housing growth agreed with the Local Plan Team and based on a detailed assessment (See NDP Evidence Report - Future Housing in Holme-next-the-Sea at https://holmentspc.com/?page_id=366). It makes more than ample provision to accommodate the number of new homes needed by the BC for the Local Plan. In addition, provision has been made for a small allocation of 5 houses to meet a specific, identified local need.

2.1.2 In response to MIQ45 we believe that the boundary for Holme is justified and based on proportionate evidence. Furthermore, the boundary forms an integral part of a wider, GIS-based zoning system developed to take account of sustainability constraints including *inter alia* flood risk zones, climate change adaptation, EU Protected Sites, Heritage, AONB and Conservation Area impact considerations.

2.1.3 The site allocation is currently outside but adjacent to the development boundary. It was agreed with the BC that the boundary would be adjusted to include the development once completed. This has proved to be extremely sound advice. In answer to MIQ46 we contend that the boundary is unquestionably positively prepared and effective in delivering growth in a sustainable way.

2.1.4 Because paragraphs (5) and (6) in Policy LP31 mean that it would not apply to Holme-next-the-Sea (an SVAH entirely in the AONB with a Made NDP) we have not previously commented on

policies LP04 or LP31. However, as Part 2 MIQs 358 and 359 open up the possibility of deleting these paragraphs we now wish to comment as set out in our Reg 19 response.

2.1.5 In response to Part 1 MIQ47 we contend that LP04 is unclear in its intentions and to the extent that it opens up the possibility of giving permission for windfall sites adjacent to SVAH boundaries (subject to deletion of clauses 5 and 6 in LP31) it would lead to a pattern of development in attractive locations which have no services and where access depends almost entirely on the car. This would clearly be unsustainable and render the Plan unsound.

2.1.6 If the justification for deleting these clauses is to promote sufficient windfall sites to meet Borough Housing Need then other solutions should be considered first. In the event that a housing shortfall began to loom, then there are numerous sites that have already been considered in previous Calls for Sites and evaluated through HELAA. Presumably further Calls for Sites would be possible if needed, providing an approach to this issue which simplifies what appears to be an unworkably complex combination of policies and ensuring more effective and transparent public consultation. We believe that unless this and other alternatives are considered before adopting this approach the proposed MMs and the deletion of LP31 (5) and (6) are unjustified.

2.1.7 Were this approach to be adopted it would undermine the basis for existing and emerging Neighbourhood Plans. These rely on the BC to provide a solid figure for the quantum of housing required from each Neighbourhood Area and in accordance with the Localism Act allow the local community to decide where this should be located. It would also run counter to the spirit if not the letter of the BC's Statement of Community Involvement with respect to adopted NDPs. It is worth pointing out that the choices given to local communities via NDPs do engender ownership and have been shown to encourage the delivery of more housing than might otherwise have been the case. Holme is a good example of this.

2.1.8 Finally, in the context of the questions raised about clarity in MIQ47, paragraph 2 refers to 'other policies in the Local Plan'. Clarity as to whether 'Local Plan' includes Neighbourhood Plans is crucial in interpreting the policy. This issue occurs elsewhere throughout the submitted plan. The BC website refers to the 'Development Plan' and sometimes the term 'Local Development Framework' is used.