

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

Holme-next-the-Sea Parish Council Position Statement

MATTER 3 THE ECONOMY

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 Economy Issues.

2 Touring and Permanent Holiday Sites (Policy LP09)

2.1.1 MIQ67 asks whether criterion 2 of Policy LP09 is clear and consistent with national policy regarding minor development proposals for holiday accommodation 'within the setting of' the Area of Outstanding Natural Beauty.

2.1.2 It is suggested that this policy is unclear in this respect and that further, this reflects general inconsistency in the section headed 'Location Requirements'.

2.1.3 While the supporting text (5.3.4) is clear that sites will not normally be permitted in the AONB, SSSIs and the Coastal Change Management Area, clauses 1 and 2 of the Policy potentially suggest otherwise.

2.1.4 Clause 1 states that sites "will not be permitted" unless criteria (a) to (e) can be met. Clause 2 suggests a more liberal approach to minor development proposals within the AONB and/or within its setting. "Minor development proposals...will only be permitted within the AONB where... the proposal will not negatively impact on the landscape setting and scenic beauty of the AONB or on the landscape setting of the AONB if outside the designated area".

2.1.5 This would seem to suggest that there is more likelihood of a site being acceptable in the AONB or its setting than elsewhere. Furthermore, there is potential for confusion about whether criteria 1 (a)-(e) apply to proposals in the AONB or whether it is just sufficient to demonstrate no impact on landscape setting and scenic beauty.

2.1.6 Lack of clarity in the similarly worded SADMP Policy DM11 has previously resulted in more than one costly planning appeal in Holme and given the intense development pressure for camping and caravan sites in the AONB, will doubtless lead to more unless this policy is more clearly worded.

4.1.4 Restrictions on tourist sites are found in neighbouring local plans (see for example North Norfolk) and this reflects the potential harm these sites may have on the character and special qualities of the AONB landscape. This goes beyond visual impact and includes *inter alia* traffic, emissions, noise, lighting, littering and unacceptable pressure on areas with limited services – especially waste disposal. Such restrictions are therefore positive to the extent that they aim to protect the key environmental assets that draw visitors to unspoiled areas that are of major importance to the local economy. If these assets continue to be damaged by poor development management (including tourist accommodation) then the whole basis for sustainable rural tourism (MIQ66) will be undermined.

2.1.7 In this context it is worth noting that when the North Norfolk AONB was designated, areas with high concentrations of caravans were excluded as a result of their negative impact on the landscape.

2.1.8 In broad terms, given National Policy, a logical outcome of LP09 should be that development of tourist facilities will be strictly controlled throughout the Borough and will not be expected in the AONB where the NPPF requirement is to 'conserve and enhance'. This is not a negative proposition and the introduction to the Policy could be framed along the lines "*In order to ensure a sustainable future for rural tourism, protect rural communities and the natural capital which underpins the local economy, proposals for new holiday accommodation sites will not normally be permitted...*". This approach would be consistent with the suggestion in MIQ66 that a more positive wording is required.

2.1.9 Finally, on issues of clarity, the definition of 'touring and permanent holiday accommodation' in the Policy needs to be far more rigorous in identifying the wide variety of accommodation now on offer. It is notable that camping and glamping are not explicitly mentioned in the definition but should be included.

2.1.10 MIQ 68 asks whether the proposed MMs are justified and necessary for soundness. Certainly in relation to MIQ68 (b) there is a serious issue in relation to the Protected Sites. The BC currently relies on a strategy to mitigate harm caused to the Protected Sites by development of tourist facilities through payment of a levy in accordance with SADMP DM19. However, the HRA for the SADMP screened out likely impacts from Tourist facilities because SADMP Policy DM11 controls development of these facilities in the AONB and close to the Designated Sites. Clearly this undermines the HRA because the size of the Levy was calculated on the basis of expected visitor pressure associated with the planned number of new dwellings (not new dwellings plus caravans/tents).

2.1.11 It is clear from the description of RAMS (which will replace the current mitigation strategy) that the reality of the situation with regard to tourist accommodation is that the amount is unknown because there is no quantified tourist strategy. It is also now clear that the visitor numbers to the Protected Sites associated with tourism have been grossly underestimated (eg visitor numbers to Holme Dunes NNR used for the HRA/submitted plan were estimated at c 40,000pa and the actual number is now known to be in excess of 200,000pa – see Holme Dunes Visitor Management Plan). Perhaps not surprisingly the recent Natural England Report on the state of the North Norfolk Coast notes worrying declines in environmental quality.

2.1.12 Given this background a precautionary approach to controlling visitor pressure on the Norfolk Coast would seem to be essential. This justifies blanket restrictions on tourist accommodation development in the AONB close to the Protected Sites and certainly justifies the MM proposals referred to in MIQ68 (b). If anything, the question needs to be *do they go far enough to ensure that the Plan is compliant with the Habitats Regulations?*