

**Borough Council of King's Lynn & West
Norfolk:**

**Old Hunstanton Neighbourhood Plan 2021-
2036 – Consultation on Proposed Modifications
of the Examiners Report (proposed deviation
from Examiner's Recommendations)**

September 2023

Borough Council of
**King's Lynn &
West Norfolk**



Old Hunstanton Neighbourhood Plan: Proposed deviations from Examiner’s Recommended Modifications

The Old Hunstanton Neighbourhood Plan examination ran from January – July 2023. The Examiner’s Report was published on 3 July 2023. The Examiner confirmed that, subject to modifications (as set out in the Examiner’s Report), the Old Hunstanton Neighbourhood Plan fulfils the “basic conditions”¹, the tests that the Neighbourhood Plan needs to fulfil to allow it to proceed to referendum.

The Borough Council, in conjunction with the Qualifying Body (Old Hunstanton Parish Council) has accepted many of the Examiner’s Modifications to the Neighbourhood Plan. However, the Qualifying Body (QB) has expressed concerns that certain Examiner’s Recommended Modifications (ERMs) risk undermining policy aspirations identified by the community during the plan-making process (2018-2022).

If the Borough Council wishes to deviate from an ERM, this will entail further consultation regarding any such variations to the recommendations. This is necessary to explain the proposed deviation and provide justification for the Borough Council’s proposal, with reference to the basic conditions.

Consultation on Proposed Modifications of the Examiners Report (proposed deviation from Examiner’s Recommended Modifications)

Under [Regulation 17A\(2-4\)](#), the decision on whether the Old Hunstanton Neighbourhood Plan can proceed to referendum rests with the Borough Council. However, any decision to materially deviate from the Examiner’s Recommendations must ensure that the Plan continues to fulfil the basic conditions. The Borough Council is proposing to deviate from ERMs regarding the following submission Plan policies and/ or supporting text:

- Policy 2 Settlement Breaks
- Policy 6 New Housing as Permanent Dwellings
- Policy 7 Consultation
- Policy 8 Community Facilities
- Policy 9 Infill Development
- Policy 15 Mobile Phone and Broadband Provision
- Policy 16 Existing and New Businesses
- Policy 17 Advertising and Signage
- Policy 19 Dark Night Skies
- Policy 20 Green Spaces

¹ https://www.west-norfolk.gov.uk/download/downloads/id/7926/old_hunstanton_examiners_report_july_2023.pdf

Deviations from ERMs vary significantly, between minor/ consequent changes to policies and/ or supporting text, to substantive changes. Annex 1 to this paper sets out each proposed deviation from an ERM and provides an explanation and justification for each.

For clarity and readability, Annex 2 (below) sets out a “clean” version of the proposed changes to the relevant sections (extracts) of the Neighbourhood Plan. This is to explain the form that the Plan would be presented to referendum.

Responding to the consultation

The consultation will run for six weeks, from Wednesday, 6 September until Wednesday, 18 October 2023 (inclusive). To be valid, representations can **only** relate to deviations from the ERMs, shown in **green** or **cyan (sky blue)** in Annex 1. These must be received by **11:59pm on 18 October 2023**.

Representations should be made, in writing, as follows, by:

- Email: planning.policy@west-norfolk.gov.uk; or
- Post: Old Hunstanton Neighbourhood Plan consultation,
Planning Policy
King’s Court
Chapel Street
King’s Lynn
PE30 1EX

In responding, be mindful of the basic conditions. That is, that the Plan:

1. Has regard to national policies and advice contained in guidance issued by the Secretary of State;
2. Contributes to the achievement of sustainable development;
3. Is in general conformity with the strategic policies of the development plan in the area;
4. Is compatible with European Union (EU) obligations and European Convention on Human Rights (ECHR); and
5. Does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

Please note that representations received after the closing date (18 October 2023) may not be counted and may be discarded.

Further details about the Old Hunstanton Neighbourhood Plan are available on the [Neighbourhood Plan](#) web page.

Annex 1: Proposed Modifications of the Examiners Report – proposed deviation from Examiner’s Recommended Modifications

Submission Plan Policy	Examiner’s Report (para No)	Proposed deviation from Examiner’s Recommended Modification (ERM) <ul style="list-style-type: none"> ERM accepted – shown by strikethrough and/ or yellow highlight Text reinstated from submission Plan – shown by pale blue highlight New/ additional text shown by italic/ bold/ green highlight or text deletions deviating from ERM by italic/ strikethrough/ green highlight (as appropriate) 	Justification/ rationale for deviating from ERM
Policy 2 Settlement Breaks	Para 73	<p>Justification</p> <p>Gaps between settlements are important in maintaining the separate identities of smaller settlements, providing their setting and preventing coalescence. Land immediately outside settlement boundaries is important to the form and character of a settlement, providing both the foreground and the background views of the settlement from a distance and opportunities for views from the settlement. To the north of Chapel Bank the open rolling land affords an uninterrupted view out to sea and across the Wash.</p> <p>Old Hunstanton village and Hunstanton town could easily merge if there was to be development outside Old Hunstanton’s existing development boundary and this is to be avoided. Hunstanton’s draft Neighbourhood Plan also seeks to address this by specifying a green separation zone, albeit within Old Hunstanton parish. Likewise, Heacham and Holme next the Sea’s draft Neighbourhood Plans advocate the inclusion of separation zones to prevent coalescence.</p> <p>Three settlement breaks have been identified (see Map 3 Settlement Breaks)</p> <p>Area A</p> <p>Hunstanton has already built up to its Parish boundary along much of its eastern side, which makes the preservation of this area crucial to maintaining separation between the two settlements. Hunstanton’s draft Neighbourhood Plan identifies Area A as a green buffer zone and this Plan mirrors that. The area is the belt of land between Old Hunstanton’s Parish boundary to the west and the AONB (with the protection that affords) to the east.</p> <p>Area B</p> <p>This area is the coastal margin between Old Hunstanton to the south and Hunstanton to the north. Development in the area cannot be sustainable as it is in a flood zone. The eastern section is also designated as an AONB.</p> <p>Area C</p>	<p>The “Justification” text in the submission Plan (mostly recommended for deletion by Examiner) provides some explanation for the setting of Old Hunstanton village, within its wider rural/ coastal setting.</p> <p>The role of the Area of Outstanding Natural Beauty (AONB) in protecting the character of the eastern part of the parish/ Neighbourhood Area is also recognised in the submitted Plan, although this text is recommended for deletion as a consequence of the proposed deletion of Area B as a settlement break.</p> <p>Retention of some form of wording to explain the setting of Old Hunstanton is considered appropriate/ useful as justification for Policy 2. Also, it is useful to include reference to the role of the AONB in protecting the eastern part of the Neighbourhood Area. Therefore, some additional text, incorporating elements of text proposed for deletion by the Examiner has been retained, as part of the Policy 2 Justification.</p>

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		<p>Holme next the Sea's Neighbourhood Plan also places importance on maintaining separation between Holme and Old Hunstanton. Any development along the A149, potentially joining the two settlements is to be resisted; it is also an area in a flood zone and designated as an AONB.</p> <p>Land between the settlements of Old Hunstanton and Ringstead is afforded protection from historic parkland and AONB designation. The Neighbourhood Plan seeks to protect the distinctive character of Old Hunstanton's village and countryside and to prevent the coalescence of Old Hunstanton with Hunstanton. Policy 2 achieves this through the designation of a Settlement Break, as shown on Map 3 "Settlement Breaks."</p> <p><i>The countryside beyond the built-up area defines the setting of the village. This includes the AONB to the east and south, views of The Wash/ North Sea, parkland, and wildlife/ biodiversity corridors. The AONB protects much of the Plan area from inappropriate development, but the area around Chapel Bank, between Old Hunstanton and Hunstanton is identified as being particularly vulnerable.</i></p>	
Policy 6 New Housing as Permanent Dwellings	Para 111	<p>SECOND HOMES</p> <p>Justification</p> <p>High proportions of second homes and holiday lets are characteristic of many North West Norfolk coastal villages.</p> <p>Second homes</p> <p>The number of second homes in Old Hunstanton has steadily increased over the years. In 2009 the Parish Plan stated that of 317 residences 106 were second homes (33%). By 2019 the ratio had risen to 358:134 (37%) (BCKLWN, November 2019).</p>	<p>The Examiner's assessment and evidence presented in support of Policy 6 within the submission Plan (Justification/ Evidence, p19-20) have been analysed. It is concluded that there is sufficient justification to depart/ deviate from the Examiner's Recommendation. Analysis and explanation for this decision are set out below.</p> <p>Analysis</p> <p>The Examiner's report sets out the rationale for his recommendation (paras 98-110):</p> <ul style="list-style-type: none"> Deemed contrary to NPPF para 60

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		<p><i>As of January 2023, the number of second homes against the total housing stock (properties registered for Council Tax) was 349: 125 (36%), a similar proportion to the 2019 figure (BCKLWN, February 2023).</i></p> <p>Some second homes are visited frequently by their owners; they contribute to village life, use local tradespeople, and upon retirement the home often becomes the principal residence. However, other second homes are left empty for most of the year, or sublet to holidaymakers, so there is little investment in the village community and they are frequently serviced by management companies, so do not benefit local traders.</p> <p>Holiday lets</p> <p><i>An A 2021</i> internet search of holiday lets identifies <i>identified</i> over 50 such properties, 14% of Old Hunstanton's housing stock. Some are owned by residents, who generate income from them. However, many are operated by holiday letting businesses outside Old Hunstanton. The short-lived nature of the occupancy means that, while there may be some benefit to local pubs and other businesses, there is no sustained investment in the community.</p> <p><i>The latest (January 2023) Council Tax data reveals a reduction of 9 dwellings in the housing stock between November 2019 and January 2023. This is also reflected in a 9 dwellings reduction to second homes numbers, indicating that these may have been sold off by owners as businesses premises (e.g. holiday lets). This represents an average 3 dwellings per year loss from the housing stock.</i></p> <p>With a <i>current (2023)</i> housing stock comprising <i>37% 36%</i> second homes and <i>also 14% around 17%</i> holiday lets, <i>only over</i> half the village has permanent residents. As with other parishes in the area, there is a widely held view that <i>"in order for the village to be sustainable, permanent residences should be prioritised, as without them there would not be a 'village' in any sense of the word and thus nothing to contribute to the tourism of the area"</i> (Brancaster Neighbourhood Plan) <i>on the North Norfolk Coast,</i></p>	<ul style="list-style-type: none"> Not borne out by evidence base (Consultation Statement) Effectiveness of Policy 6 in delivering desired outcome <p>The submission Plan Justification explains differences between second homes and holiday lets and how local concerns focus on the latter. It also analyses recent data regarding second homes/ holiday lets. Latest data (January 2023) identifies a reduction in properties registered for Council Tax by 9 dwellings since 2019 (from 358 to 349), while registered second homes have reduced by 9 dwellings (from 134 to 125). This could suggest incremental conversion from second homes to holiday lets, over a 3/4-year period.</p> <p>Of 16 parishes within the northern part of the Norfolk Coast AONB, Old Hunstanton has the 5th highest % of second homes, while analysis of the data suggests steady loss of housing stock to holiday lets.</p> <p>Although the effectiveness of Policy 6 could be questioned (e.g. this would only relate to new dwellings), this should not (by itself) be considered a failure to meet the basic conditions. Policy 6 specifically seeks to contribute to sustainable development</p>

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		<p><i>there are concerns that the continued loss of permanent residencies (and therefore resident population) represents a threat to the sustainability of these coastal communities.</i> Even second home owners in Old Hunstanton feel that the number of second homes and holiday lets is jeopardising the village community, a case of killing the goose that lays the golden egg.</p> <p>Of particular concern is the trend for developers to buy up properties and replace them with more or larger properties specifically designed for the second home/holiday let market. The Parish Council sees numerous planning applications for large, modern buildings that are out of scale with surrounding buildings and whose building materials are unsympathetic to the traditional look of the village. The loss of smaller properties means that many local people, particularly first-time buyers, are priced out of the market. The Policy seeks to make it unattractive for developers to buy up sites for building second homes/holiday lets <i>check and manage development proposals involving the loss of existing housing stock to holiday lets or second homes, a significant threat to the social sustainability of Old Hunstanton.</i></p> <p>It is acknowledged that there is no mechanism available to limit the use of existing dwellings as second homes or holiday lets. However, as in the adjacent parish of Sedgeford, the Neighbourhood Plan seeks to prevent the use of new dwellings as second homes <i>in line with other North Norfolk coastal communities, several of which have successfully developed principal residences' Neighbourhood Plan policies, this Plan seeks to ensure future proposals for second homes/ holiday lets are effectively managed, within the framework set by the Core Strategy, which sets criteria for the development of new tourism accommodation (Policy CS10). It is also necessary to recognise the need for any policy to be workable, in terms of decision-making/ development management.</i></p> <p>Evidence</p> <ul style="list-style-type: none"> <i>As of January 2023, 134 125</i> of Old Hunstanton's housing stock are second homes. This represents 37% of the total housing stock of 358. (BCKLWN 	<p>(Justification), with reference to sustaining the village as a viable community.</p> <p>It is also noted that the Neighbourhood Plan has presented evidence to justify inclusion of Policy 6. Latest (2023) data re household Nos similarly backs up Plan evidence.</p> <p>Overall, Policy 6 closely reflects that for Sedgeford (H8), a Parish with a far lower proportion (17%) of second homes than Old Hunstanton. Although its limited scope (new dwellings) raises questions as to its effectiveness, this is not a reason not to include such a policy (with reference to the basic conditions), particularly socially sustainable development.</p> <p>Conclusion</p> <p>The second homes policy – Policy 6, as submitted and supported by updated (2023) evidence – is considered appropriately supported by appropriate evidence and would fulfil the basic conditions in terms of contributing to the achievement of sustainable development.</p> <p>In deviating from the Examiner's Recommendation by retaining Policy 6 (renumbered Policy 4), this has consequent implications for other Plan policies. A change to Policy 9 (Infill Development) is also</p>

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		<p>November 2019) is registered as second homes, representing 36% of the total housing stock (349 dwellings).</p> <p>For comparison, the table below shows the numbers of second homes registered for Council tax for parishes within the Borough of King's Lynn and West Norfolk situated (fully or partially) within the northern part of the Norfolk Coast AONB.</p> <table border="1" data-bbox="499 550 1563 1378"> <thead> <tr> <th>Parish name (within main north coast AONB)</th> <th>No of households registered for Council Tax (January 2023)</th> <th>No of second homes registered for Council Tax (January 2023)</th> <th>% total housing stock as second homes</th> <th>NDP "principal residences" policy (where applicable)</th> </tr> </thead> <tbody> <tr> <td>Burnham Overy</td> <td>239</td> <td>115</td> <td>48.1%</td> <td> </td> </tr> <tr> <td>Thornham</td> <td>362</td> <td>153</td> <td>42.3%</td> <td>No policy (reference NDP paragraph 7.2.25)</td> </tr> <tr> <td>Brancaster</td> <td>775</td> <td>320</td> <td>41.3%</td> <td>No policy</td> </tr> <tr> <td>Holme Next The Sea</td> <td>218</td> <td>88</td> <td>40.4%</td> <td>HNTS 18</td> </tr> <tr> <td>Old Hunstanton</td> <td>349</td> <td>125</td> <td>35.8%</td> <td> </td> </tr> <tr> <td>Titchwell</td> <td>58</td> <td>19</td> <td>32.8%</td> <td> </td> </tr> <tr> <td>Burnham Norton</td> <td>69</td> <td>22</td> <td>31.9%</td> <td> </td> </tr> <tr> <td>Burnham Market</td> <td>672</td> <td>188</td> <td>28.0%</td> <td>Policy 3</td> </tr> <tr> <td>Ringstead</td> <td>185</td> <td>44</td> <td>23.8%</td> <td> </td> </tr> <tr> <td>Burnham Thorpe</td> <td>101</td> <td>24</td> <td>23.8%</td> <td> </td> </tr> <tr> <td>Choseley</td> <td>13</td> <td>3</td> <td>23.1%</td> <td> </td> </tr> <tr> <td>Docking</td> <td>664</td> <td>120</td> <td>18.1%</td> <td> </td> </tr> </tbody> </table>	Parish name (within main north coast AONB)	No of households registered for Council Tax (January 2023)	No of second homes registered for Council Tax (January 2023)	% total housing stock as second homes	NDP "principal residences" policy (where applicable)	Burnham Overy	239	115	48.1%		Thornham	362	153	42.3%	No policy (reference NDP paragraph 7.2.25)	Brancaster	775	320	41.3%	No policy	Holme Next The Sea	218	88	40.4%	HNTS 18	Old Hunstanton	349	125	35.8%		Titchwell	58	19	32.8%		Burnham Norton	69	22	31.9%		Burnham Market	672	188	28.0%	Policy 3	Ringstead	185	44	23.8%		Burnham Thorpe	101	24	23.8%		Choseley	13	3	23.1%		Docking	664	120	18.1%		<p>proposed, as a consequence of the decision to retain Policy 6.</p>
Parish name (within main north coast AONB)	No of households registered for Council Tax (January 2023)	No of second homes registered for Council Tax (January 2023)	% total housing stock as second homes	NDP "principal residences" policy (where applicable)																																																																
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		<table border="1" data-bbox="504 359 1547 544"> <tr> <td>Sedgeford</td> <td>310</td> <td>53</td> <td>17.1%</td> <td>Policy H8</td> </tr> <tr> <td>Hunstanton</td> <td>3,132</td> <td>443</td> <td>14.1%</td> <td>No policy (reference paragraph 17)</td> </tr> <tr> <td>Snettisham</td> <td>1,603</td> <td>142</td> <td>8.9%</td> <td>Policy NP04</td> </tr> </table> <p data-bbox="573 596 1491 655">Old Hunstanton ranks 5th out of 16 parishes within the AONB, in terms of the proportion of second homes within the total housing stock.</p> <ul style="list-style-type: none"> <li data-bbox="517 683 1525 815">Over 50 properties are advertised on the internet as holiday lets. This represents 14% of the total housing stock of 358 At early-January 2023 there were around 60 properties advertised as holiday lets, representing around 17% of the total housing stock. <li data-bbox="517 842 1464 975">55% of questionnaire respondents felt that there should be a limit on holiday lets/second homes in the village. 28% were against a limit and 17% had no opinion, so a policy is required to reflect the, albeit small, majority view illustrating significant local concerns. <li data-bbox="517 1002 1509 1198">There was a strong feeling from questionnaire respondents that 'a balance of residents versus holiday homes needs to be maintained', even from second homeowners (23% of second home respondents felt there should be a limit on holiday lets/second homes). The worry is that the community cannot thrive if the number of permanent residents become too low as the following questionnaire response illustrates: <i data-bbox="591 1219 1532 1385">"It is very difficult as a second home owner (and therefore part of the problem!) but the focus needs to be on how the village can regain affordable family housing for young families to live in year-round and give life to their village. We bring in employment and income to local businesses but people need to be able to live here too. The increasing number of houses that are not occupied plus</i> 	Sedgeford	310	53	17.1%	Policy H8	Hunstanton	3,132	443	14.1%	No policy (reference paragraph 17)	Snettisham	1,603	142	8.9%	Policy NP04	
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		<p><i>those that only open up for a month of the year makes it a less welcoming place in the winter.”</i></p> <div style="border: 1px solid black; padding: 10px;"> <p>Policy 6-4 New Housing as Permanent Dwellings</p> <p>New dwellings will only be supported where there is a restriction to ensure its occupancy as a principal residence.</p> <p>Sufficient guarantee must be provided of such occupancy restriction through the imposition of a planning condition or legal agreement. New unrestricted second homes will not be supported at any time.</p> <p>Principal residences are defined as those occupied as the residents' sole or main residence, where the residents spend the majority of their time when not working away from home.</p> <p>The condition or obligation on new open market homes will require that they are occupied only as the primary (principal) residence of those persons entitled to occupy them (typically through a S106 agreement).</p> <p>Occupiers of homes with a principal residence condition will be required to keep proof that they are meeting the obligation or condition, and be obliged to provide this proof if/ when the Borough Council of Kings Lynn & West Norfolk requests this information. Proof of principal residence is via verifiable evidence which could include, for example (but not limited to) residents being registered on the local electoral register and being registered for and attending local services (such as healthcare, schools etc).</p> </div>	
Policy 7 Consultation	Para 114	<p>CONSULTATION</p> <p><u>Justification</u></p>	The Parish Council highlighted the importance of consultation with planners and developers regarding proposals affecting the

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		<p>Old Hunstanton Parish Council takes a keen interest in all planning applications. It has clear views on how the village should develop, embodied in this Neighbourhood Plan. Prior consultation with the Council can be useful in gaining an idea of what is likely to be supported.</p> <p><u>Evidence</u></p> <ul style="list-style-type: none"> Much of Old Hunstanton Parish Council's engagement with its community arises in respect of planning applications. Residents regularly contact the Council to share their concerns and a contentious planning application will increase the number of parishioners at Council meetings. It is government policy to encourage local consultation and liaising with the Parish Council, a statutory consultee for planning applications, is one such mechanism. <p>Policy 7 Consultation</p> <p>Consultation and early engagement with Old Hunstanton Parish Council and the local population on the part of developers and property owners will be encouraged and supported.</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>Community Action: Consultation</p> <p>Old Hunstanton Parish Council will encourage developers to consult and engage with the Parish Council and local people from an early stage in the development process. Whilst not a planning policy, this is considered to form an important part of the planning process in the Neighbourhood Area.</p> <p>The Parish Council highlights the importance of community consultation and engagement for development proposals affecting the Conservation Area and other heritage assets.</p> </div>	<p>Conservation Area (submission Plan Policy 4). The Examiner recommended deletion of the statement “<i>Old Hunstanton Parish Council encourages and supports consultation with planners and developers</i>”, as this is a statement, rather than a land-use policy requirement.</p> <p>It is appropriate to recognise the importance of consultation and engagement between the Parish Council, Borough Council and developers. Therefore, an additional sentence within the Community Action: “Consultation” section of the Plan (as modified by the Examiner), to highlight the importance of consultation/ engagement in considering proposals affecting the Conservation Area and/ or other heritage assets would address the Parish Council’s concerns regarding the impact of inappropriate development on the historic environment.</p>				
Policy 8 Community Facilities	Para 122	<p>Evidence...</p> <ul style="list-style-type: none"> Community facilities are defined below and located on Map 6. <table border="1" data-bbox="504 1369 1547 1409" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">COMMUNITY FACILITY</th> <th style="width: 50%;">IMPORTANCE TO COMMUNITY...</th> </tr> </thead> <tbody> <tr> <td style="height: 20px;"> </td> <td> </td> </tr> </tbody> </table>	COMMUNITY FACILITY	IMPORTANCE TO COMMUNITY...			The importance of the football ground (currently used by Redgate Rangers FC) as a community facility was emphasised in the submission Plan (Policy 3, to be deleted as
COMMUNITY FACILITY	IMPORTANCE TO COMMUNITY...						

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		<table border="1" data-bbox="501 357 1550 513"> <tr> <td data-bbox="501 357 564 513">9</td> <td data-bbox="564 357 949 513">Football Ground, off A149/ Church Road (currently used by Redgate Rangers FC)</td> <td data-bbox="949 357 1550 513">Local green space Supports physical activity <i>Protection of playing pitches emphasised by Sport England as a priority...</i></td> </tr> </table> <div data-bbox="501 564 1550 1091" style="border: 1px solid black; padding: 10px;"> <p>Policy 8-5 Community Facilities</p> <p>Development proposals that would result in a change of use or the redevelopment for noncommunity use of the community facilities (Church, hall and park, village hall, lifeboat station, golf club, allotments, playground, football ground, Post Office, shops, café, pubs, hotels and restaurants) will only be supported where it can be demonstrated that:</p> <ol style="list-style-type: none"> there is insufficient demand to justify the retention of the facility following at least 12 months active marketing, it can be demonstrated that the facility is no longer viable; or equivalent or better provision has been made in a location where it can be easily accessed by the village. <p>Development which would increase the sustainability of these facilities and would be consistent with other policies in the development plan will be supported.</p> </div>	9	Football Ground, off A149/ Church Road (currently used by Redgate Rangers FC)	Local green space Supports physical activity <i>Protection of playing pitches emphasised by Sport England as a priority...</i>	<p>an ERM). Policy 3 included statements regarding the NPPF policy for protection of sports facilities (para 99) and the role of Sport England in decision making.</p> <p>Policy 8 identifies the football ground as a protected community facility but does not name the playing field. In the interest of clarity, and to explain the importance of protecting playing pitches, additional text is proposed for inclusion within the Community Facility table and Policy 8 (renumbered Policy 5).</p>
9	Football Ground, off A149/ Church Road (currently used by Redgate Rangers FC)	Local green space Supports physical activity <i>Protection of playing pitches emphasised by Sport England as a priority...</i>				
Policy 9 Infill Development	Para 138	<p>INFILL DEVELOPMENT</p> <p><u>Justification</u></p> <p>It is anticipated, by both BCKLWN and Old Hunstanton Parish Council, that any new developments in Old Hunstanton will take the form of infill within the existing development boundary.</p>	Policy 9 (submission Plan) sets a requirement that the footprint of dwellings should not exceed 40% of the plot area. The Examiner (para 137) did not consider this obligation was supported by evidence to explain why it would contribute the			

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		<p>The village is a very popular place to live, yet space is limited, so there is a tendency for existing dwellings to extend, and new dwellings to be squeezed into gardens. Apart from making everything look cramped, there are issues with interfering with neighbours' privacy through building close to boundaries and increasing height, exacerbating parking problems by increasing need while reducing the area available, and reducing garden area. Also, these large dwellings are frequently speculative developments for the second home and holiday let market rather than for the benefit of local residents who are being priced out of the market.</p> <p>The map samples below illustrate the existing spacious feel to dwelling plots in Old Hunstanton. A footprint limited to 40% of the plot will maintain the existing, uncramped feel of the village, and is consistent with ratios adopted by adjacent parishes in their Neighbourhood Plans.</p> <p>The Neighbourhood Plan promotes infill development in Old Hunstanton Village. The Neighbourhood Plan requires development to respect its surroundings.</p> <p>For guidance, to avoid cramping and over-development the footprint of new dwellings (infilling and redevelopment proposals, including replacement dwellings) should not exceed 40% of the total plot area.</p> <p><u>Evidence...</u></p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>Policy 9-6 Infill Development</p> <p>Within the development boundary of Old Hunstanton infill development, of individual, or small groups of dwellings will only be supported where:</p> <ul style="list-style-type: none"> a) they would relate well to the neighbouring development in terms of height, scale and b) impact on the street scene, and, where applicable, would preserve or enhance the character or appearance of the Conservation Area, and </div>	<p>achievement of sustainable development (i.e. meet the basic conditions).</p> <p>The Parish Council has expressed a desire to retain the 40% plot area standard in Policy 9, as this reflects similar policies in the “made” Holme Next The Sea and Sedgeford Neighbourhood Plans. Such a restrictive/ prescriptive policy requirement ought to be an exception rather than the rule and would need to be supported by detailed evidence. Unlike Old Hunstanton, the main built-up areas of Holme and Sedgeford (which both include the 40% requirement as a policy obligation) are situated within the AONB.</p> <p>The Examiner has proposed amendment of Policy 9, to recognise the need to avoid cramped development within the built-up area. It is considered appropriate to retain some reference to the 40% standard; e.g. as guidance within the Policy “Justification”, rather than within the policy itself.</p>

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		<p>e) they would not have an unacceptable detrimental impact on the living conditions of the occupants of neighbouring property, and</p> <p>d) the provision of a vehicular access would not have an unacceptable detrimental impact on to highway safety and on-site parking can be provided in accordance with NCC Parking Standards.</p> <p>Dwellings should maintain adequate spacing and not appear cramped on the plot or in relation to neighbouring dwellings and their footprint should not exceed 40% of the plot area.</p> <p>New dwellings must be used as a principal residence (see Policy 6 New Housing as Permanent Dwellings).</p> <p>Infill dwellings providing affordable housing to meet Old Hunstanton local needs will be supported providing they meet the above criteria. Infill development within the settlement boundary of Old Hunstanton must respect local character and the amenity of neighbouring occupiers; and must not harm highway safety. Development in Old Hunstanton must not appear cramped or inappropriate in its village setting.</p> <p>New dwellings must be used as a principal residence (see Policy 6-4 New Housing as Permanent Dwellings).</p>	
Policy 15 Mobile Phone and Broadband Provision	Para 168	<p>Justification</p> <p>Mobile phone signal in Old Hunstanton is very weak for most main providers and broadband speeds are poor. Social connectivity is important for the community and new development needs to be encouraged to address this issue.</p> <p>The Parish Council will seek to lobby the Borough Council of Kings Lynn and West Norfolk to encourage shared network access among mobile phone operators where new or extended base stations are proposed.</p> <p>The ultimate goal is to enable effective access to super-fast broadband for the whole community.</p>	As submitted, Policy 15 (renumbered Policy 11) emphasises the importance of achieving super-fast broadband for the community, proposing shared network access as a proposed approach. The ERM policy revision recognises this, setting out how this outcome may be achieved through the planning system.

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		<u>Evidence...</u>	It is useful to emphasise the overall outcome that the Parish Council is seeking to achieve; namely delivering superfast broadband for the whole community. An additional sentence/ paragraph within the Policy justification should reiterate this goal, without breaching the basic conditions.
Policy 16 Existing and New Businesses	Para 175	<p>Policy 16-12 Existing and New Businesses</p> <p>Development necessary for the maintenance or expansion of existing businesses, or the establishment of new businesses will be supported within the development boundary where it:</p> <ul style="list-style-type: none"> a) does not result in a scale of development or an intensity of use that is incompatible with the site and its surroundings b) is not prominent or intrusive in the AONB, or adjacent to it c) is consistent in appearance with the character of any existing buildings on the site and those in the immediate neighbourhood d) will not result in unacceptable harm in terms of noise and disturbance, odours or emissions to the living conditions of the occupants of neighbouring or nearby dwellings e) provides adequate off-street parking for employees, customers, deliveries and any vehicles associated with the business and the additional traffic generated is not harmful to road safety or the free flow of traffic. <p>At present there are no caravan parks in the parish and Old Hunstanton Parish Council's general policy would be to not approve of any such facilities. Any caravan parks, an exception to this general rule, may not exceed Certified Site criteria, ie, be small, privately run campsites with a maximum of five caravans or motorhomes at any one time for up to 28 consecutive days, allowing space of six meters between each unit. The development of existing and new business within the settlement boundary and</p>	<p>The QB has expressed concerns that Policy 16 (renumbered Policy 12, as modified by the Examiner) is insufficiently robust. There may be a case to re-instate policy in some criterion format, which would make the policy more readable without materially affecting the overall content. Some parts of the submitted policy are referred to by the Examiner as being unclear; e.g. "adequate off-street" parking. Criterion (e) refers to off-street parking generated by businesses, but this is addressed with reference to highway safety.</p> <p>Suggested re-wording is proposed, to better show policy requirements in criteria format (for ease of reference), but reflecting the removal of references that the Examiner considers vague and imprecise.</p>

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		<p>the sustainable growth of business throughout the Parish will be supported subject to development respecting local character, residential amenity and highway safety. Development should not appear prominent or intrusive within the AONB or its setting, where this:</p> <ul style="list-style-type: none"> a) Respects local character and does not result in a scale and intensity incompatible with the site and its surroundings. b) Does not appear prominent or intrusive within the AONB or its setting; and c) Does not result in significant adverse impacts on residential amenity, in terms of noise, odours, emissions, or highway safety. 	
Policy 17 Advertising and Signage	Para 180	<p>Justification</p> <p>The erection of advertising signs in the village will typically result in resident complaints to Old Hunstanton Parish Council. It is appreciated that some signage for local businesses is necessary, but anything beyond that is not considered to be in keeping with the rural character of the village. The Parish Council will encourage businesses to ensure that signs and advertisements are kept to the minimum necessary and are designed and sited in a manner that ensures that they respect Old Hunstanton's rural character.</p> <p>To ensure advertisements do not harm visual amenity, the following guidelines indicate how advertisements can be erected to avoid or minimise adverse impacts:</p> <ul style="list-style-type: none"> a) the siting, size, height, proportions, colour, materials and supporting structure of adverts and signs should respect the character and appearance of the setting and, where appropriate the building to which they relate b) adverts and signs should normally be provided only at points of access to sites, and located so as to minimise their visual effect 	<p>The Parish Council is concerned about the loss of explanatory criteria, with reference to the Examiner's modifications. However, the Examiner has concluded (para 177) that Policy 17, as submitted (renumbered Policy 13), conflicts with national policy.</p> <p>Retention of policy criteria (a-e) contents as guidance/ good practice regarding the erection of advertisements/ signage could be appropriate. In this way proposals would be determined in accordance with the revised policy wording (that the Examiner considers fulfils the basic conditions), but further guidance/ best practice is set out in the policy Justification.</p>

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		<p>c) the number of signs or advertisements should be kept to a minimum in order reduce visual intrusion and to avoid any negative, cumulative impact</p> <p>d) where multiple signs are unavoidable they should be consistent in size and appearance</p> <p>e) avoid illuminated signs</p> <p>Evidence</p> <ul style="list-style-type: none"> Excessive signage, and the associated intrusive effect upon a rural village, is something that many residents and Old Hunstanton Parish Council would wish to avoid. Norfolk Coast Partnership Forum guidelines state that signs in the AONB should be used only where necessary, and then only in a way which minimises their effect on the natural beauty of the area. Signage should conform to these guidelines throughout the parish of Old Hunstanton. 	
Policy 19 Dark Night Skies	Para 188	<p>Community Action: Dark Skies</p> <p>The Parish Council will seek to encourage development to minimise light pollution and will lobby the Borough Council of King's Lynn and West Norfolk to control light pollution via planning conditions, where possible.</p> <p>The following guidelines indicate how light pollution from external lighting should be minimised and/ or mitigated:</p> <p>a) Fully shielded (e.g. enclosed in full cut-off flat glass fitments)</p> <p>b) Directed downwards (mounted horizontally to the ground, not tilted upwards)</p> <p>c) Avoid "dusk to dawn" lamps</p>	The Examiner's recommendations recognise the Parish Council's aspirations to reduce light pollution. It is considered helpful to retain suggested solutions (e.g. Policy 19 criteria) as guidance within the revised "Dark Skies" section.

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		<p>d) Use white light low-energy lamps (e.g. LED, metal halide or fluorescent); avoid orange/ pink sodium lighting</p> <p>e) Lighting in prominent locations should be avoided, except where needed in the interest of public safety/ security</p> <p>f) Building designs incorporating large windows/ rooflights</p>							
Policy 20 Green Spaces [Local Green Space]	Para 198	<p>Evidence</p> <ul style="list-style-type: none"> 98% of questionnaire respondents wanted the Neighbourhood Plan to maintain existing green and open spaces within the village. Locality's 'Neighbourhood Planning Local Green Spaces' states that green spaces contribute to quality of place. It stresses the need to designate green spaces in Neighbourhood Plans, and to formulate policies to protect them. Government guidance on planning for local green spaces states that: "It can provide health and recreation benefits to people living and working nearby; have an ecological value and contribute to green infrastructure (see National Planning Policy Framework para.171) as well as being an important part of the landscape and setting of built development, and an important component in the achievement of sustainable development (see National Planning Policy Framework para. 7-9)." NPPF (paragraphs 101-103) set the criteria for designating Local Green Spaces. Local Green Spaces are identified in the table below and shown on Map 10. <table border="1" data-bbox="501 1134 1550 1380"> <thead> <tr> <th data-bbox="501 1134 862 1177">GREEN SPACES</th> <th data-bbox="862 1134 1550 1177">IMPORTANCE TO COMMUNITY</th> </tr> </thead> <tbody> <tr> <td data-bbox="501 1177 862 1281">Churchyard</td> <td data-bbox="862 1177 1550 1281">Forms part of the character and setting of a historic area Within Conservation Area</td> </tr> <tr> <td data-bbox="501 1281 862 1380">Duck Pond</td> <td data-bbox="862 1281 1550 1380">Adds to local amenity Provides an attractive setting and outlook Within Conservation Area</td> </tr> </tbody> </table>	GREEN SPACES	IMPORTANCE TO COMMUNITY	Churchyard	Forms part of the character and setting of a historic area Within Conservation Area	Duck Pond	Adds to local amenity Provides an attractive setting and outlook Within Conservation Area	<p>Public Rights of Way do not normally constitute LGS (unless associated with a wider area), as these are protected/ covered by separate legislation (a fact acknowledged in the "Justification" text in the submitted Plan, 3rd paragraph/ 3rd bullet point).</p> <p>The QB has expressed a desire to (at least) identify key Public Rights of Way/ paths within the Plan area. It is suggested that some reference could be made to the main routes, with a link provided to the County Council's Rights of Way mapping.</p>
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		<ul style="list-style-type: none"> Other green infrastructure (e.g. Public Rights of Way) is protected under separate legislation, but several links within the Plan area that contribute positively to the character of Old Hunstanton are noted below. 															
		<table border="1"> <tr> <td colspan="2">FOOTPATHS</td> </tr> <tr> <td>Peddars Way</td> <td>Restricted byway 8 National Trail</td> </tr> <tr> <td>North Norfolk Coastal Path</td> <td>FP13 England Coast Path</td> </tr> <tr> <td>River Hun footpath</td> <td>FP10</td> </tr> <tr> <td>The Buttlands</td> <td>FP4</td> </tr> <tr> <td>Sandy Lane</td> <td>FP6</td> </tr> <tr> <td>Smugglers Lane footpath</td> <td>FP3</td> </tr> </table>	FOOTPATHS		Peddars Way	Restricted byway 8 National Trail	North Norfolk Coastal Path	FP13 England Coast Path	River Hun footpath	FP10	The Buttlands	FP4	Sandy Lane	FP6	Smugglers Lane footpath	FP3	
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Lovers Lane	Permissive pathway								
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Annex 2: “clean” version of the proposed changes to the relevant sections (extracts) of the Neighbourhood Plan

Policy 2 Settlement Breaks

Justification

The Neighbourhood Plan seeks to protect the distinctive character of Old Hunstanton’s village and countryside and to prevent the coalescence of Old Hunstanton with Hunstanton. Policy 2 achieves this through the designation of a Settlement Break, as shown on Map 3 “Settlement Breaks.”

The countryside beyond the built-up area defines the setting of the village. This includes the AONB to the east and south, views of The Wash/ North Sea, parkland, and wildlife/ biodiversity corridors. The AONB protects much of the Plan area from inappropriate development, but the area around Chapel Bank, between Old Hunstanton and Hunstanton is identified as being particularly vulnerable.

Policy 6 [4] New Housing as Permanent Dwellings

SECOND HOMES

Justification

High proportions of second homes and holiday lets are characteristic of many North West Norfolk coastal villages.

Second homes

The number of second homes in Old Hunstanton has steadily increased over the years. In 2009 the Parish Plan stated that of 317 residences 106 were second homes (33%). By 2019 the ratio had risen to 358:134 (37%) (BCKLWN, November 2019).

As of January 2023, the number of second homes against the total housing stock (properties registered for Council Tax) was 349: 125 (36%), a similar proportion to the 2019 figure (BCKLWN, February 2023).

Some second homes are visited frequently by their owners; they contribute to village life, use local tradespeople, and upon retirement the home often becomes the principal residence. However, other second homes are left empty for most of the year, or sublet to holidaymakers, so there is little investment in the village community and they are frequently serviced by management companies, so do not benefit local traders.

Holiday lets

A 2021 internet search of holiday lets identified over 50 such properties, 14% of Old Hunstanton’s housing stock. Some are owned by residents, who generate income from them. However, many are operated by holiday letting

businesses outside Old Hunstanton. The short-lived nature of the occupancy means that, while there may be some benefit to local pubs and other businesses, there is no sustained investment in the community.

The latest (January 2023) Council Tax data reveals a reduction of 9 dwellings in the housing stock between November 2019 and January 2023. This is also reflected in a 9 dwellings reduction to second homes numbers, indicating that these may have been sold off by owners as businesses premises (e.g. holiday lets). This represents an average 3 dwellings per year loss from the housing stock.

With a current (2023) housing stock comprising 36% second homes and around 17% holiday lets, over half the village has permanent residents. As with other parishes on the North Norfolk Coast, there are concerns that the continued loss of permanent residencies (and therefore resident population) represents a threat to the sustainability of these coastal communities. Even second home owners in Old Hunstanton feel that the number of second homes and holiday lets is jeopardising the village community, a case of killing the goose that lays the golden egg.

Of particular concern is the trend for developers to buy up properties and replace them with more or larger properties specifically designed for the second home/holiday let market. The Parish Council sees numerous planning applications for large, modern buildings that are out of scale with surrounding buildings and whose building materials are unsympathetic to the traditional look of the village. The loss of smaller properties means that many local people, particularly first-time buyers, are priced out of the market. The Policy seeks to check and manage development proposals involving the loss of existing housing stock to holiday lets or second homes, a significant threat to the social sustainability of Old Hunstanton.

It is acknowledged that there is no mechanism available to limit the use of existing dwellings as second homes or holiday lets. However, in line with other North Norfolk coastal communities, several of which have successfully developed principal residences' Neighbourhood Plan policies, this Plan seeks to ensure future proposals for second homes/ holiday lets are effectively managed. It is also necessary to recognise the need for any policy to be workable, in terms of decision-making/ development management.

Evidence

- As of January 2023, 125 of Old Hunstanton's housing stock is registered as second homes, representing 36% of the total housing stock (349 dwellings).
- For comparison, the table below shows the numbers of second homes registered for Council tax for parishes within the Borough of King's Lynn and West Norfolk situated (fully or partially) within the northern part of the Norfolk Coast AONB.

Parish name (within main/north coast AONB)	No of households registered for Council Tax (January 2023)	No of second homes registered for Council Tax (January 2023)	% total housing stock as second homes	NDP "principal residences" policy (where applicable)
Burnham Overy	239	115	48.1%	
Thornham	362	153	42.3%	No policy (reference NDP paragraph 7.2.25)
Brancaster	775	320	41.3%	No policy
Holme Next The Sea	218	88	40.4%	HNTS 18
Old Hunstanton	349	125	35.8%	
Titchwell	58	19	32.8%	
Burnham Norton	69	22	31.9%	
Burnham Market	672	188	28.0%	Policy 3
Ringstead	185	44	23.8%	
Burnham Thorpe	101	24	23.8%	
Choseley	13	3	23.1%	
Docking	664	120	18.1%	
Sedgeford	310	53	17.1%	Policy H8
Hunstanton	3,132	443	14.1%	No policy (reference paragraph 17)
Snettisham	1,603	142	8.9%	Policy NP04
Heacham	2,743	217	7.9%	Policy 4

Old Hunstanton ranks 5th out of 16 parishes within the AONB, in terms of the proportion of second homes within the total housing stock.

- At early-January 2023 there were around 60 properties advertised as holiday lets, representing around 17% of the total housing stock.
- 55% of questionnaire respondents felt that there should be a limit on holiday lets/second homes in the village. 28% were against a limit and 17% had no opinion, illustrating significant local concerns.
- There was a strong feeling from questionnaire respondents that ‘a balance of residents versus holiday homes needs to be maintained’, even from second homeowners (23% of second home respondents felt there should be a limit on holiday lets/second homes). The worry is that the community cannot thrive if the number of permanent residents become too low as the following questionnaire response illustrates:

“It is very difficult as a second home owner (and therefore part of the problem!) but the focus needs to be on how the village can regain affordable family housing for young families to live in year-round and give life to their village. We bring in employment and income to local businesses but people need to be able to live here too. The increasing number of houses that are not occupied plus those that only open up for a month of the year makes it a less welcoming place in the winter.”

Policy 4 New Housing as Permanent Dwellings

New dwellings will only be supported where there is a restriction to ensure its occupancy as a principal residence.

Sufficient guarantee must be provided of such occupancy restriction through the imposition of a planning condition or legal agreement. New unrestricted second homes will not be supported at any time.

Principal residences are defined as those occupied as the residents' sole or main residence, where the residents spend the majority of their time when not working away from home.

The condition or obligation on new open market homes will require that they are occupied only as the primary (principal) residence of those persons entitled to occupy them (typically through a S106 agreement).

Occupiers of homes with a principal residence condition will be required to keep proof that they are meeting the obligation or condition, and be obliged to provide this proof if/ when the Borough Council of Kings Lynn & West Norfolk requests this information. Proof of principal residence is via verifiable evidence which could include, for example (but not limited to) residents being registered on the local electoral register and being registered for and attending local services (such as healthcare, schools etc).

Policy 7 Consultation

CONSULTATION

Community Action: Consultation

Old Hunstanton Parish Council will encourage developers to consult and engage with the Parish Council and local people from an early stage in the development process. Whilst not a planning policy, this is considered to form an important part of the planning process in the Neighbourhood Area.

The Parish Council highlights the importance of community consultation and engagement for development proposals affecting the Conservation Area and other heritage assets.

Policy 8 [5] Community Facilities

Evidence...

- Community facilities are defined below and located on Map 6.

	COMMUNITY FACILITY	IMPORTANCE TO COMMUNITY...
9	Football Ground, off A149/ Church Road (currently	Local green space

	used by Redgate Rangers FC)	Supports physical activity Protection of playing pitches emphasised by Sport England as a priority...
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Policy 5 Community Facilities

Development proposals that would result in a change of use or the redevelopment for noncommunity use of the community facilities (Church, hall and park, village hall, lifeboat station, golf club, allotments, playground, Redgate football ground, Post Office, shops, café, pubs, hotels and restaurants) will only be supported where it can be demonstrated that:

- a) following at least 12 months active marketing, it can be demonstrated that the facility is no longer viable; or
- b) equivalent or better provision has been made in a location where it can be easily accessed by the village.

Development which would increase the sustainability of these facilities will be supported.

Policy 9 [6] Infill Development

INFILL DEVELOPMENT

Justification

The Neighbourhood Plan promotes infill development in Old Hunstanton Village. The Neighbourhood Plan requires development to respect its surroundings.

For guidance, to avoid cramping and over-development the footprint of new dwellings (infilling and redevelopment proposals, including replacement dwellings) should not exceed 40% of the total plot area.

Evidence...

Policy 6 Infill Development

Infill development within the settlement boundary of Old Hunstanton must respect local character and the amenity of neighbouring occupiers; and must not harm highway safety. Development in Old Hunstanton must not appear cramped or inappropriate in its village setting.

New dwellings must be used as a principal residence (see Policy 4 New Housing as Permanent Dwellings).

Policy 15 [11] Mobile Phone and Broadband Provision

Justification

Mobile phone signal in Old Hunstanton is very weak for most main providers and broadband speeds are poor. Social connectivity is important for the community and new development needs to be encouraged to address this issue.

The Parish Council will seek to lobby the Borough Council of Kings Lynn and West Norfolk to encourage shared network access among mobile phone operators where new or extended base stations are proposed.

The ultimate goal is to enable effective access to super-fast broadband for the whole community.

Evidence...

Policy 16 [12] Existing and New Businesses

Policy 12 Existing and New Businesses

The development of existing and new business within the settlement boundary and the sustainable growth of business throughout the Parish will be supported where this:

- a) Respects local character and does not result in a scale and intensity incompatible with the site and its surroundings;
- b) Does not appear prominent or intrusive within the AONB or its setting; and
- c) Does not result in significant adverse impacts on residential amenity, in terms of noise, odours, emissions, or highway safety.

Policy 17 [13] Advertising and Signage

Justification

The Parish Council will encourage businesses to ensure that signs and advertisements are kept to the minimum necessary and are designed and sited in a manner that ensures that they respect Old Hunstanton's rural character.

To ensure advertisements do not harm visual amenity, the following guidelines indicate how advertisements can be erected to avoid or minimise adverse impacts:

- a) the siting, size, height, proportions, colour, materials and supporting structure of adverts and signs should respect the character and appearance of the setting and, where appropriate the building to which they relate
- b) adverts and signs should normally be provided only at points of access to sites, and located so as to minimise their visual effect

- c) the number of signs or advertisements should be kept to a minimum in order to reduce visual intrusion and to avoid any negative, cumulative impact
- d) where multiple signs are unavoidable they should be consistent in size and appearance
- e) avoid illuminated signs

Evidence

- Excessive signage, and the associated intrusive effect upon a rural village, is something that many residents and Old Hunstanton Parish Council would wish to avoid.
- Norfolk Coast Partnership Forum guidelines state that signs in the AONB should be used only where necessary, and then only in a way which minimises their effect on the natural beauty of the area...

Policy 19 Dark Night Skies

Community Action: Dark Skies

The Parish Council will seek to encourage development to minimise light pollution and will lobby the Borough Council of King's Lynn and West Norfolk to control light pollution via planning conditions, where possible.

The following guidelines indicate how light pollution from external lighting can be minimised and/ or mitigated:

- a) Fully shielded (e.g. enclosed in full cut-off flat glass fittings)
- b) Directed downwards (mounted horizontally to the ground, not tilted upwards)
- c) Avoid "dusk to dawn" lamps
- g) Use white light low-energy lamps (e.g. LED, metal halide or fluorescent); avoid orange/ pink sodium lighting
- h) Lighting in prominent locations should be avoided, except where needed in the interest of public safety/ security
- i) Building designs incorporating large windows/ rooflights

Policy 20 [15] Green Spaces [Local Green Spaces]

Evidence

- 98% of questionnaire respondents wanted the Neighbourhood Plan to maintain existing green and open spaces within the village.

- Locality’s ‘Neighbourhood Planning Local Green Spaces’ states that green spaces contribute to quality of place. It stresses the need to designate green spaces in Neighbourhood Plans, and to formulate policies to protect them.
- Local Green Spaces are identified in the table below and shown on Map 10.

GREEN SPACES	IMPORTANCE TO COMMUNITY
Churchyard	Forms part of the character and setting of a historic area Within Conservation Area
Duck Pond	Adds to local amenity Provides an attractive setting and outlook Within Conservation Area
Allotments	Providing opportunities for growing local food
Playground	Supports physical activity
Football Ground	Supports physical activity

- Other green infrastructure (e.g. Public Rights of Way) is protected under separate legislation, but several links within the Plan area contribute positively to the character of Old Hunstanton are noted below.

FOOTPATHS	
Peddars Way	Restricted byway 8 National Trail
North Norfolk Coastal Path	FP13 England Coast Path
River Hun footpath	FP10
The Buttlands	FP4
Sandy Lane	FP6
Smugglers Lane footpath	FP3
Lovers Lane	Permissive pathway
Church Walk	Permissive pathway
Hamon Close to A149	Footpath

Further details are available through the County Council’s Public Rights of Way web pages ([About Public Rights of Way - Norfolk County Council](#)).