

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

**Old Hunstanton Neighbourhood Plan 2021-
2036 – Decision on Examiner's
recommendations**

20 November 2023

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



Borough Council Decision on the Examiner's recommendation for the Old Hunstanton Neighbourhood Plan

Neighbourhood Planning (General) (Amendment) Regulations 2012

Name of neighbourhood area	Old Hunstanton Neighbourhood Area
Parish Council	Old Hunstanton Parish Council
Submission Plan (Regulation 16) consultation	30 September – 11 November 2022
Examination	January – July 2023
Examiner's Report Received	3 July 2023
Consultation on Proposed Modifications of the Examiners Report (proposed deviation from Examiner's Recommendations), September 2023	6 September – 18 October 2023

1.0 Introduction

- 1.1 The Town and Country Planning Act 1990 (as amended), states that the Council has a statutory duty to assist communities in the preparation of neighbourhood development plans and to take the plans through a process of examination and referendum.
- 1.2 The Localism Act 2011 (Part 6 chapter 3) details the Local Planning Authority's responsibilities under Neighbourhood Planning.
- 1.3 This Decision Statement confirms that the modifications proposed in the Examiner's Report, have mostly been accepted. Accordingly, the draft Old Hunstanton Neighbourhood Plan has been amended, taking account of these proposed modifications and where the Borough Council has decided to deviate from the Examiner's recommendations. The Borough Council has now reached the decision that the Old Hunstanton Neighbourhood Plan 2021-2036 should proceed to referendum.

2.0 Background

- 2.1 The Neighbourhood Area of Old Hunstanton was designated on 25 July 2018. The Neighbourhood Area corresponds with Parish boundaries for Old Hunstanton Parish Council. The Old Hunstanton Neighbourhood Plan has been prepared by Old Hunstanton Parish Council, the Qualifying Body. Work on the production of the plan has undertaken by members of the Parish Council and the local community, since 2018.
- 2.2 The first draft Plan was published by the Parish Council for Regulation 14 consultation in March 2021. The Regulation 14 consultation took place over 8 weeks, from 1 May – 26 June 2021, inclusive. The consultation took place over

8-weeks (as opposed to the normal statutory 6-weeks requirement) due to Covid-19 restrictions. Further details are set out in the Consultation Statement¹.

- 2.3 The Plan was submitted to the Borough Council of King's Lynn and West Norfolk in August 2022. A consultation under Regulation 16 took place between 30 September and 11 November 2022 (inclusive), inviting comments from the public and stakeholders.
- 2.4 In January 2023 an independent examiner, Mr Nigel McGurk (Erimax Planning), was appointed by the Borough Council with consent of the Qualifying Body, to undertake the examination of the Old Hunstanton Neighbourhood Plan. The examination took place between January and July 2023; reviewing whether the plan meets the basic conditions required by legislation and should proceed to referendum. This culminated in the Examiner's Report being issued on 3 July 2023.
- 2.5 The Examiner's Report concludes that subject to making the modifications recommended by the examiner, the plan meets the basic conditions as set out in legislation and should proceed to a Neighbourhood Planning Referendum. A limited number of modifications were not accepted by the Borough Council and/ or Old Hunstanton Parish Council.
- 3.0 Proposed Modifications of the Examiners Report (proposed deviation from Examiner's Recommendations)**
- 3.1 In cases where it is proposed to deviate from the Examiner's recommended modifications (ERMs) it is necessary to consult further where these represent a material change to the content of the Neighbourhood Plan. This is necessary to ensure that any such changes are subject to appropriate scrutiny and do not breach the basic conditions.
- 3.2 In August 2023, agreement was agreed between Old Hunstanton Parish Council and the Borough Council about a limited number of proposed deviations from ERMs. These relate to the following policies and/ or supporting text in the submitted Plan:
- 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

¹ https://www.west-norfolk.gov.uk/download/downloads/id/7352/old_hunstanton_neighbourhood_plan_consultation_statement.pdf

- Policy 17 Advertising and Signage
- Policy 19 Dark Night Skies
- Policy 20 Green Spaces

3.3 These were duly subject to further “Consultation on Proposed Modifications of the Examiners Report (proposed deviation from Examiner’s Recommendations)”. The 6-weeks consultation ran from 6 September – 18 October 2023 (inclusive). An extract from the consultation paper² providing analysis of, and justification for, deviation from the ERMs, is set out in Appendix 1.

3.4 The Borough Council is required to consider all the Examiner’s recommendations and/ or any feedback received through the subsequent “deviation” consultation (September – October 2023). Individual modifications proposed by the Examiner are set out in Appendix 2 (below) alongside the council’s decision in response to each recommendation and the reasons for them. Where it is proposed to deviate from an ERM, the rationale/ justification for this is also summarised in Appendix 2.

4.0 Reasons for Decision

4.1 The Old Hunstanton Neighbourhood Development Plan (the Plan) as modified by the Examiner’s recommendations and the Borough Council (in agreement with Old Hunstanton Parish Council), has had regard to national policies and advice contained in guidance issued by the Secretary of State. A requirement to have regard to policies and advice does not require that such policy and advice must necessarily be followed, but it is intended to have and does have to a significant effect. A neighbourhood plan must not constrain the delivery of important national policy objectives. The Plan was examined against policies in the National Planning Policy Framework (NPPF), July 2021 version³ and this conclusion is reached bearing this in mind. The advice within National Planning Practice Guidance (NPPG)⁴ has also been borne in mind in reaching this conclusion.

4.2 Paragraph 13 of the 2021 NPPF is clear that neighbourhood plans should support the delivery of strategic policies contained in local plans and spatial development strategies. The recent (5 September 2023) NPPF update did not inform the independent examination, as this concluded before release of the updated NPPF. Notwithstanding, NPPF paragraph 13 remains unchanged between the 2021 and 2023 versions.

² https://www.west-norfolk.gov.uk/download/downloads/id/8000/consultation_on_deviating_from_examiners_rec August - October 2023.pdf

³ The September 2023 NPPF update (<https://www.gov.uk/government/publications/national-planning-policy-framework--2>) has not been taken into account, as the Plan Examination concluded prior to publication of the updated NPPF.

⁴ <https://www.gov.uk/guidance/neighbourhood-planning--2>

- 4.3 Qualifying bodies should plan positively to support local development, shaping and directing development in their area that is outside these strategic policies. Specifically, NPPF paragraph 29 states that neighbourhood plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies.
- 4.4 Beyond this, the content of a draft neighbourhood plan will determine which other aspects of national policy are or are not relevant considerations, to be taken into account. The basic condition allows qualifying bodies, the independent examiner and local planning authority to reach a view in those cases where different parts of national policy need to be balanced.
- 4.5 Having considered all relevant information, including representations submitted in response to the Plan (at all stages of the process), the Examiner's analysis and recommendations, the Borough Council has come to the view that the Plan recognises and respects relevant constraints. The Plan has developed a positive suite of policies that seek to bring forward positive and sustainable development in the neighbourhood area. The Vision sets a clear focus on managing development to be sympathetic to the unique character of the village, maintaining the integrity of Old Hunstanton and nearby settlements, and safeguarding its local and distinctive character whilst allowing the economy to flourish and managing tourism.
- 4.6 The Examiner's Report concludes that subject to making the modifications recommended by the examiner, the plan meets the basic conditions as set out in legislation and should proceed to a Neighbourhood Planning Referendum. Old Hunstanton Parish Council and the Borough Council accepted most of the proposed modifications. However, it is proposed to deviate from ERMs regarding policies 2, 6, 7, 8, 9, 15, 16, 17, 19 and 20, and/ or supporting text. Most significantly it is proposed to reinstate the second homes/ principal residences policy (submission Plan Policy 6 "New Housing as Permanent Dwellings"), contrary to the Examiner's recommendation for deletion.
- 4.7 The "Consultation on Proposed Modifications of the Examiners Report (proposed deviation from Examiner's Recommendations)" (6 September – 18 October 2023) did not raise any substantive issues or objections regarding compliance with the basic conditions. On this basis, the Old Hunstanton Neighbourhood Plan can now proceed to referendum without a need to re-open or undertake further independent examination of proposed deviation from the ERMs, against the basic conditions.
- 4.8 Having carefully considered each of the recommendations made within the Examiner's Report and the reasons for them, and feedback from the subsequent (September – October 2023) consultation, the Borough Council (in accordance with the 1990 Act; Schedule 48 paragraph 12) has decided to make the modifications to the draft plan referred to in Appendix 2 (incorporating deviations from ERMs, as set out in Appendix 1) and Appendix 3 (Revised Maps: Map 3 and Map 10), below. The changes set out at appendices 2 and 3 should ensure that the draft plan meets the basic conditions set out in legislation.

- 4.9 Appendix 2 explains how agreement has been reached between Old Hunstanton Parish Council and the Borough Council, as to how the ERMs and/or deviations from these should be clearly and systematically presented with this report. Appendix 2 is separated into appropriate columns. As stated by the examiner in the final examination report (July 2023) and left apparent in the table: Areas that need modification are expressed in column 2. Columns 3-6 explain the response(s) of the Parish Council and Borough Council to each, showing how the Plan is to be amended accordingly.
- 4.10 To comply with the basic conditions on the European Union legislation, the Qualifying Body produced a Strategic Environmental Assessment. The Strategic Environmental Assessment and Habitats Regulation Assessment Screening Report (February 2021)⁵ sets out the introduction and background in sections 1, 2 and 3. Section 4 sets out the application of SEA Directive to plans and programmes. Section 5 sets out the framework for Habitats Regulation Assessment. Section 6 sets out the screening outcome, summary and monitoring of the assessment.
- 4.11 The Plan, as modified by the Examiner's recommendations and the Borough Council, is in all respects fully compatible with Convention rights contained in the Human Rights Act 1998. There has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known.
- 4.12 The Plan, as modified by the Examiner's recommendations, complies with the definition of a Neighbourhood Development Plan (NDP) and the provisions that can be made in an NDP. The Plan sets out policies in relation to the development and use of land in the whole of the neighbourhood area; it specifies the period for which it is to have effect and it does not include provision about development that is 'excluded development'.

5.0 Decision

- 5.1 The Neighbourhood Planning (General) Regulations 2012 requires the local planning authority to outline what action to take in response to the recommendations that the examiner made in the report under paragraph 10 of Schedule 4A to the 1990 act (as applied by Section 38A of the 2004 Act) in relation to a neighbourhood development plan.
- 5.2 King's Lynn and West Norfolk Borough Council has carefully considered each of the recommendations made in the Examiner's Report and the reasons for them. The Borough Council has decided to accept most of the modifications to the draft plan, except for recommendations regarding the following Plan policies and/or supporting text, as set out in the "Consultation on Proposed Modifications of the Examiners Report (proposed deviation from Examiner's

⁵ https://www.west-norfolk.gov.uk/download/downloads/id/7354/old_hunstanton_neighbourhood_plan_sea_and_hra_screening_report_2021.pdf

Recommendations)” (section 3.0 above/ Appendix 1; 6 September – 18 October 2023):

- 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; and
- Policy 20 Green Spaces.

5.3 Representations were received from National Highways, Natural England, Norfolk County Council and Holme Next The Sea Parish Council. These consisted of “no comments” or supporting representations, highlighting approval for deviations from ERMs, particularly support for revised policies 2 and 6. No representations raised issues or concerns regarding compliance with the basic conditions, especially given the additional evidence presented to accompany/ support proposed changes to the Examiner’s modifications (Appendix 1).

5.4 Following the modifications made (set out in appendices 2 and 3), the Old Hunstanton Neighbourhood Development Plan meets the basic conditions:

- a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the plan;
- b) The making of the neighbourhood plan contributes to the achievement of sustainable development;
- c) The making of the neighbourhood plan is in general conformity with the strategic policies contained in the King’s Lynn and West Norfolk Local Plan - Core Strategy (2011) and Site Allocations and Development Management Policies Plan (2016);
- d) The making of the neighbourhood plan does not breach and is otherwise compatible with EU obligations; and;
- e) The making of the neighbourhood plan is not likely to have a significant effect on a European site either alone or in combination with other plans and projects.

- 5.5 It is recommended that the Old Hunstanton Neighbourhood Plan progresses to referendum.

Decision made by:

Lorraine Gore

Lorraine Gore
(Chief Executive)

20 November 2023

(On behalf of Geoff Hall (Executive Director Environment and Planning)
and the Cabinet Member for Development and Regeneration)

Appendix 1: Consultation on Proposed Modifications of the Examiners Report (proposed deviation from Examiner's Recommendations), September 2023

A "Consultation on Proposed Modifications of the Examiners Report (proposed deviation from Examiner's Recommendations)" was run from 6 September – 18 October 2023 (inclusive): https://www.west-norfolk.gov.uk/download/downloads/id/8000/consultation_on_deviating_from_examiners_recs_august_-_october_2023.pdf. This proposed a range of variations to/ deviations from the Examiner's Recommended Modifications. The proposed deviations (with justification for each), subject to consultation, are set out in the table (Appendix 1) below.

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 strike through 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/ strike through/ 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</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</p>

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		<p>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>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>	<p>of text proposed for deletion by the Examiner has been retained, as part of the Policy 2 Justification.</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>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</p>

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		<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>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).</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>An A 2021 internet search of holiday lets identifies 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.</p> <p>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.</p>	<p>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 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>

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		<p>With a current (2023) housing stock comprising 37% 36% second homes and also 14% around 17% holiday lets, only over 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) on the North Norfolk Coast, there are concerns that the continued loss of permanent residences (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.</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 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.</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 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</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 (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</p>

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		<p>CS10). It is also necessary to recognise the need for any policy to be workable, in terms of decision-making/ development management.</p> <p>Evidence</p> <ul style="list-style-type: none">As of January 2023, 134 125 of Old Hunstanton's housing stock are second homes. This represents 37% of the total housing stock of 358. (BCKLWN November 2019) is registered as second homes, representing 36% of the total housing stock (349 dwellings). <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><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><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></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	<p>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 proposed, as a consequence of the decision to retain Policy 6.</p>
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		<table><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><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>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">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.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.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:	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	
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		<p><i>"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."</i></p> <div style="border: 1px solid black; padding: 10px; margin-top: 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>	

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Policy 7 Consultation	Para 114	<p>CONSULTATION</p> <p><u>Justification</u></p> <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;"> <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>The Parish Council highlighted the importance of consultation with planners and developers regarding proposals affecting the 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>

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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><tr><td></td><td>COMMUNITY FACILITY</td><td>IMPORTANCE TO COMMUNITY...</td></tr><tr><td>9</td><td>Football Ground, off A149/ Church Road (currently used by Redgate Rangers FC)</td><td>Local green space Supports physical activity Protection of playing pitches emphasised by Sport England as a priority...</td></tr></table> <div><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><p>a) 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</p><p>b) equivalent or better provision has been made in a location where it can be easily accessed by the village.</p><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>		COMMUNITY FACILITY	IMPORTANCE TO COMMUNITY...	9	Football Ground, off A149/ Church Road (currently used by Redgate Rangers FC)	Local green space Supports physical activity Protection of playing pitches emphasised by Sport England as a priority...	<p>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 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>
	COMMUNITY FACILITY	IMPORTANCE TO COMMUNITY...							
9	Football Ground, off A149/ Church Road (currently used by Redgate Rangers FC)	Local green space Supports physical activity Protection of playing pitches emphasised by Sport England as a priority...							
Policy 9 Infill Development	Para 138	INFILL DEVELOPMENT	Policy 9 (submission Plan) sets a requirement that the footprint of dwellings						

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		<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> <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><i>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.</i></p> <p><u>Evidence...</u></p> <div data-bbox="510 1190 1550 1342"> <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> </div>	<p>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 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> 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 c) they would not have an unacceptable detrimental impact on the living conditions of the occupants of neighbouring property, and 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><u>Justification</u></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>	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

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		<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> <p><u>Evidence...</u></p>	<p>recognises this, setting out how this outcome may be achieved through the planning system.</p> <p>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.</p>
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</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>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 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><u>Justification</u></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 	<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</p>

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		<p>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> <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. 	guidance/ best practice is set out in the policy Justification.
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>	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>c) Avoid “dusk to dawn” lamps</p> <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><tr><th>GREEN SPACES</th><th>IMPORTANCE TO COMMUNITY</th></tr><tr><td>Churchyard</td><td>Forms part of the character and setting of a historic area Within Conservation Area</td></tr><tr><td>Duck Pond</td><td>Adds to local amenity Provides an attractive setting and outlook</td></tr></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	<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 make to the main routes, with a link provided to the County Council's Rights of Way mapping.</p>
GREEN SPACES	IMPORTANCE TO COMMUNITY								
Churchyard	Forms part of the character and setting of a historic area Within Conservation Area								
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		<table><tr><td></td><td>Within Conservation Area</td></tr><tr><td>Golf Club</td><td>Supports physical activity Encourages tourism Of ecological importance (eg orchids)</td></tr><tr><td>Hall and Park</td><td>Forms part of the character and setting of an historic area National Heritage List for England – listed park & garden Open to public on Thursdays Located within Conservation Area Located within AONB</td></tr><tr><td>Allotments</td><td>Providing opportunities for growing local food</td></tr><tr><td>Playground</td><td>Supports physical activity</td></tr><tr><td>Football Ground</td><td>Supports physical activity</td></tr><tr><td>Sand Dunes</td><td>Encourages tourism Important habitat for flora and fauna</td></tr><tr><td>Ringstead Downs</td><td>SSSI Norfolk Wildlife Trust reserve</td></tr></table> <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><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></table>		Within Conservation Area	Golf Club	Supports physical activity Encourages tourism Of ecological importance (eg orchids)	Hall and Park	Forms part of the character and setting of an historic area National Heritage List for England – listed park & garden Open to public on Thursdays Located within Conservation Area Located within AONB	Allotments	Providing opportunities for growing local food	Playground	Supports physical activity	Football Ground	Supports physical activity	Sand Dunes	Encourages tourism Important habitat for flora and fauna	Ringstead Downs	SSSI Norfolk Wildlife Trust reserve	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	
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		<table><tr><td>Smugglers Lane footpath</td><td>FP3</td></tr><tr><td>Lovers Lane</td><td>Permissive pathway</td></tr><tr><td>Church Walk</td><td>Permissive pathway</td></tr><tr><td>Hamon Close to A149</td><td>Footpath</td></tr></table> <p>Further details are available through the County Council's Public Rights of Way web pages (About Public Rights of Way - Norfolk County Council).</p>	Smugglers Lane footpath	FP3	Lovers Lane	Permissive pathway	Church Walk	Permissive pathway	Hamon Close to A149	Footpath	
Smugglers Lane footpath	FP3										
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Hamon Close to A149	Footpath										

Appendix 2: Examiner's Recommendations, decisions and consequent amendments to the Old Hunstanton Neighbourhood Plan

Section (page/ Policy reference in submission Plan)	Specific Modification for the NP to be compliant with the basic conditions as stated in the Final Old Hunstanton NP Examination Report July 2023 Where modifications are recommended, they appear in bold text . Where the examiner has suggested specific changes to the wording of the policies or new wording these appear in <i>bold italics</i> .	Who will make these changes? LPA or QB	Do you agree with the modification	What needs to be done to meet the specific modification?	Amendments and new changes made to the proposed Old Hunstanton neighbourhood plan (as submitted, August 2022).
Intro: (page 2)	<p>Para 58:</p> <ul style="list-style-type: none"> Page 2, last para includes a reference to the Neighbourhood Plan being designated in 2019. Change to: "...the village. The Neighbourhood Plan was designated on 25 July 2018 (see Map..." Page 2, the last para is not supported by the Consultation Statement submitted alongside the Neighbourhood Plan. Change to: "...seaward area). The Neighbourhood Plan was supported by public consultation, as set out in the Consultation Statement published and submitted alongside the Neighbourhood Plan." (delete last sentence ("The revised...xx")) The reference at the bottom of Page 2 is linked to a webpage which states "Norfolk Parishes. 	LPA/ QB	YES, except 3 rd bullet point of Examiner's Recommended Modifications (ERMs) – Minor/ non-material deviation	Textual changes; retention of Old Hunstanton Parish Council website link, but replacement with revised web link (minor modification – no material change to Plan content).	<p>In 2017 the Parish Council resolved to make a Neighbourhood Plan, to build upon the Parish Plan, but more importantly to give more substance to local feeling regarding future development of the village. In 2019 the parish was designated as the Neighbourhood Plan area The Neighbourhood Plan was designated on 25 July 2018 (see Map 1, due to an anomaly when the boundaries were redrawn, Old Hunstanton beach remained in the parish of Hunstanton, splitting Old Hunstanton in two, with a detached seaward area). Consultation comprised collection of resident and visitor opinion at the 2018 and 2019 Flower Festival & Fete, and in 2019 questionnaires were circulated to residents and businesses. Draft policies were put out for consultation in 2021. The revised Plan was then put to a referendum and adopted on xx.xx.xx. The Neighbourhood Plan was supported by public consultation, as set out in the Consultation Statement published and submitted alongside the Neighbourhood Plan.</p> <p>The Neighbourhood Plan and all supporting documentation can be found on the Old Hunstanton Parish Council website at:</p> <p>https://oldhunstantonparishcouncil.norfolkparishes.gov.uk/ https://www.oldhunstantonpc.info/neighbourhood-development-plan</p>

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	Registration has been disabled.” Delete the reference at the bottom of Page 2				
Policy 1 (pages 5-6)	<p>Para 67:</p> <ul style="list-style-type: none"> Policy 1, change wording to: “<i>Development in Old Hunstanton should be located within the existing village development boundary shown on Map 2 below.</i>” (delete the rest of Policy wording) Delete second para of Justification (“The Old...Breaks.”) and replace with “<i>Policy 1 seeks to focus development within the village, with the aim of strengthening Old Hunstanton’s village and rural character.</i>” Delete second bullet point of Evidence, which relates to Policy 2 and is repeated elsewhere. Delete third bullet point of Evidence, which is not directly 	LPA/ QB	YES	Textual changes	<p>DEVELOPMENT BOUNDARY</p> <p><u>Justification</u></p> <p>Much of the charm of Old Hunstanton, for residents and visitors alike, lies in its current village format. The existing settlement is contained, lying between coast and countryside (see Map 2).</p> <p>The Old Hunstanton development boundary and the adjacent settlement of Hunstanton are already very close, so it is vital that the current development boundary here be maintained to prevent coalescence (see Policy 2 Settlement Breaks). Policy 1 seeks to focus development within the village, with the aim of strengthening Old Hunstanton’s village and rural character.</p> <p><u>Evidence</u></p> <ul style="list-style-type: none"> 83% of questionnaire respondents wanted the Neighbourhood Plan to prevent development outside the existing village development boundary. 95% of questionnaire respondents wanted the Neighbourhood Plan to maintain clear space between Old Hunstanton, Hunstanton and other neighbouring parishes.

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	<p>relevant to the Neighbourhood Plan.</p> <ul style="list-style-type: none"> • Delete fourth bullet point of Evidence. The recommended changes result in a Policy relating to development within (not outside) the settlement boundary. • Delete fifth bullet point of Evidence. There is no substantive evidence to demonstrate that the Neighbourhood Plan provides for the Framework's (Para 60) aim of "significantly boosting the supply of homes." • Change final bullet point of Evidence to "<i>The Plan supports the provision of development appropriate to the countryside, including, having regard to Paras 78 and 79 of the NPPF, rural exception housing.</i>" 				<ul style="list-style-type: none"> • Adjoining parishes seek to incorporate settlement breaks/ separation zones into their neighbourhood plans. • Two previous attempts to develop the piece of land separating the rural village of Old Hunstanton from the town of Hunstanton (HELAA Site H253) were unequivocally rejected in July 2015 by the High Court of Justice, Queen's Bench Division, Planning Court, reaffirmed in July 2016 by the Court of Appeal and, again, in June 2017 by the Planning Inspectorate. • The Plan acknowledges the government's National Planning Policy Framework objective to significantly increase the supply of homes (NPPF para 59) and intends that this be met through infill, rather than development outside the existing development boundary. • The Plan is also mindful of NPPF paras 77-79 concerning rural housing, and provides for proposals for rural exception sites (small sites for affordable housing on agricultural land) which will be considered on individual merit. The Plan supports the provision of development appropriate to the countryside, including, having regard to Paras 78 and 79 of the NPPF, rural exception housing. <p>Policy 1 Village Development Boundary</p> <p>New developments in Old Hunstanton shall be encouraged to be located within the existing village development boundary as</p>

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					<p>defined by Borough Council of Kings Lynn & West Norfolk's SADMP (Map 2) shown on Map 2 below.</p> <p>This is in order to:</p> <ul style="list-style-type: none"> a) preserve the existing compact village structure b) protect the existing countryside, much of which is designated an Area of Outstanding Natural Beauty (AONB) c) maintain a buffer zone between primarily Old Hunstanton and Hunstanton, but also other adjacent settlements. <p>It is, however, appreciated that the National Planning Policy Framework permits certain types of development outside development boundaries (eg rural exception sites/ entry level exception sites). Any such proposed development will be considered on its individual merits and supported if it is of a sustainable nature and of benefit to the village.</p>
Policy 2 (page 9)	<p>Para 73:</p> <ul style="list-style-type: none"> Policy 2, change wording to: <i>“Land between Old Hunstanton and Hunstanton is designated as a Settlement Break (Map 3) where visual and physical local gaps should be retained.”</i> (Delete rest of Policy wording) 	LPA/ QB	YES, with the addition of “Justification” text, to emphasise the risks of in-appropriate development in/ around Chapel Bank,	Textual changes	<p><u>Justification</u></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>

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	<ul style="list-style-type: none"> • Delete all of the Justification text and replace with: “<i>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.”</i>” • Evidence, delete fourth and fifth bullet points 		outside the designated AONB.		<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>

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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.</p> <p>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>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.</p> <p>Evidence</p> <ul style="list-style-type: none"> 95% of questionnaire respondents wanted the Neighbourhood Plan to maintain clear space between Old Hunstanton, Hunstanton and other neighbouring parishes. Hunstanton has already built up to the Old Hunstanton boundary along Chapel Bank. The draft Neighbourhood Plan for Hunstanton suggests a buffer zone between the Old

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					<p>Hunstanton development boundary and parish boundary. This plan supports such a zone.</p> <ul style="list-style-type: none"> • Attempts to develop land between Old Hunstanton and Hunstanton by Hastoe Housing were rejected by the Planning Inspectorate Appeal Division. The Inspector observed that: “the appeal site and fields to the south on the east side of the Cromer Road create an expansive relatively open area which is free from significant structures between the main built-up parts of Old Hunstanton and Hunstanton. Overall, I find the area has an open and agricultural edge of settlement character and appearance which provides a sense of space between the built-up areas of two settlements.” • This decision highlights and supports the maintenance of the existing break between the settlements of Old Hunstanton and Hunstanton. • Holme next the Sea, like Old Hunstanton, is a compact village surrounded by agricultural land and open spaces. Both Neighbourhood Plans support the protection of the existing buffer zone between the two villages • Heacham’s draft Neighbourhood Plan identifies visual and physical local gaps between Heacham and Old Hunstanton. Both Neighbourhood Plans support the protection of these gaps.

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					<p>Policy 2 Settlement Breaks</p> <p>Future sustainable development in Old Hunstanton will be expected to retain the visual and physical local gaps which currently exist (see Map 3 Settlement Breaks) where coastal, agricultural and parkland create wildlife and biodiversity land corridors between Old Hunstanton and its neighbouring villages. Land between Old Hunstanton and Hunstanton is designated as a Settlement Break (Map 3) where visual and physical local gaps should be retained.</p>
Map 3 (page 10)	<ul style="list-style-type: none"> Map 3, retain area shown in “A” but delete title “A.” Introduce a Key showing land in purple in this area as a “<i>Settlement Break</i>” and also show/ annotate in the key, the settlement boundary and the Neighbourhood Area. Delete purple areas B and C; and delete dark green shading. The only annotation and key references should be to the Settlement Break, the settlement boundary and the Neighbourhood Area 	QB	NO – agree deletion of settlement breaks B and C, but propose deviation from Examiner’s modifications to retain AONB notification on map	Cartographic changes	<p>[Map 3 – Deletion of Settlement Breaks B and C in accordance with the Examiner’s recommendations, but retention of “dark green shading” (showing extent of AONB within the Neighbourhood Area is considered to provide useful factual/ spatial information (see Appendix 3, below).</p> <p>This deviation from the Examiner’s recommendations represents a minor deviation from the Examiner’s modifications, of no material consequence to the content of the Neighbourhood Plan.]</p>

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Policy 3 (page 11)	Para 82: <ul style="list-style-type: none"> • Delete Policy 3 • Delete all text on Page 11 of the Neighbourhood Plan 	LPA/ QB	YES	Textual changes	<p>LARGE SCALE DEVELOPMENT</p> <p><u>Justification</u></p> <p>Old Hunstanton has grown, over the years, along the current A149, but has no history of large scale development. The charm of the village, just as it is, is acknowledged by residents and visitors alike, and any large scale development would be neither appropriate nor welcomed.</p> <p><u>Evidence</u></p> <ul style="list-style-type: none"> • 91% of questionnaire respondents wanted the Neighbourhood Plan to prevent large scale development (10 or more homes). • BCKLWN's revised Local Development Framework (LDF) does not make a housing allocation to Old Hunstanton; it is anticipated that any development will be infill. • BCKLWN's Call for Sites for the new LDF originally included HELAA Site H253 of 56 dwellings. This site has twice been deemed inappropriate development by the High Court. In June 2020 BCKLWN confirmed to Old Hunstanton Parish Council that the revised LDF would not include this site. <p>Policy 3 Large Scale Development</p> <p>Large scale developments (10 or more homes) will only be supported in exceptional circumstances, where there is a demonstrable need to provide housing for Old Hunstanton residents.</p>

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					Sport. The Council is committed to the National Planning Policy for Sport when considering any large-scale development and no playing fields will be lost without full consultation with Sport England. A proportionate assessment for sporting provision will be applied to planning consultation. Any new development of sporting facilities will be tested as to fitness for purpose with the relevant body. In particular the Redgate football ground and club will be protected.
Policy 4 (pages 11-13)	Para 91: <ul style="list-style-type: none"> • Change the title of the Policy to “Heritage Assets” • Policy 4, delete last sentence of first para (“Old...developers.”) which comprises a statement and not a land use planning policy requirement • Policy 4, delete second para and replace with: “<i>Development proposals affecting a heritage asset, including non-designated heritage assets identified in the Neighbourhood Plan, must be supported by a heritage statement.</i>” 	LPA/ QB	YES	Textual changes	<p>CONSERVATION AREA HERITAGE ASSETS</p> <p>...NPPF 485 190 requires plans to set out a positive strategy for the conservation and enjoyment of the historic environment.</p> <p>Policy 4 3 Conservation Area Heritage Assets</p> <p>Proposals for development within the Conservation Area must respect the particular features which contribute to its character and appearance, particularly those of historic or architectural interest. Development which is sympathetic in appearance to existing buildings will be supported. Old Hunstanton Parish Council encourages and supports consultation with planners and developers.</p> <p>Any planning application for development that would potentially affect a non-designated Heritage Asset must submit a heritage statement that sets out how the proposal will conserve or better reveal the particular features which contribute to its character and appearance, particularly those of historic or architectural interest. Development proposals affecting a heritage asset, including non-</p>

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	<ul style="list-style-type: none"> Page 12, change last bullet point reference in Evidence to “<i>NPPF 190...</i>” 				designated heritage assets identified in the Neighbourhood Plan, must be supported by a heritage statement.
Policies 4-5 (pages 14-18)	<ul style="list-style-type: none"> Change title on Page 14 to “Designated <i>Heritage Assets</i>.” Remove red band and delete title “Justification” Delete “Evidence” and the two bullet points below it on Page 15 Change title in second column on Page 15 to “<i>Non-Designated Heritage Asset</i>” 	LPA/ QB	YES, but also propose addition of Non-Designated Heritage Assets sub-heading (for consistency) and deletion of link to “detailed pictorial list”, as this hyperlink is disabled/ no longer works (minor/ non-material changes)	Textual changes	<p>NON-DESIGNATED HERITAGE ASSETS</p> <p>Justification Designated Heritage Assets</p> <div> ...Stables to south of Downs farmhouse </div> <p>Non-Designated Heritage Assets</p> <p>Old Hunstanton is also rich in non-designated heritage assets, i.e. buildings/areas which are not listed but still culturally important. This Plan makes an attempt to identify such assets (see list below and Map 5) using Historic England criteria (age, rarity, aesthetic interest, group value, archaeological interest, archival interest, historical association, designed landscape interest, landmark status, social and communal value). A detailed, pictorial list is available at:</p> <p>https://oldhunstantonparishcouncil.norfolkparishes.gov.uk/list-of-supporting-documentation/</p> <p>Evidence</p> <ul style="list-style-type: none"> 96% of questionnaire respondents felt it important for the Neighbourhood Plan to protect important unlisted buildings.

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					<div>● Old Hunstanton has architectural representations of national significance (see for example art deco housing featured in the 2020 'Art Deco by the Sea' exhibition at the Sainsbury Centre of Visual Arts, Norwich).</div> <table><tr><td>No</td><td>NON-DESIGNATED HERITAGE ASSET</td><td>SIGNIFICANCE</td></tr><tr><td>1</td><td>Old Vicarage, Church Road</td><td>Former vicarage...</td></tr></table>	No	NON-DESIGNATED HERITAGE ASSET	SIGNIFICANCE	1	Old Vicarage, Church Road	Former vicarage...
No	NON-DESIGNATED HERITAGE ASSET	SIGNIFICANCE									
1	Old Vicarage, Church Road	Former vicarage...									
Policy 5 (Page 17)	Para 97: <ul style="list-style-type: none">Delete Policy 5	LPA/ QB	YES	Textual changes	Policy 5 Non-Designated Heritage Assets Any development proposed in connection with a Non-Designated Heritage Asset, listed above, must preserve the particular features which contribute to its character and appearance, particularly those of historic or architectural interest.						
Policy 6 (pages 19-20)	Para 111: <ul style="list-style-type: none">Delete Policy 6Delete all text on Page 19 and delete text above Policy 6 on page 20	LPA	NO – Agreement between LPA and QB to retain and review Policy 6 and relevant supporting text, subject	Textual changes, following consultation on the Proposed Modifications of the Examiners Report,	SECOND HOMES <u>Justification</u> 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						

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			to additional consultation. No objections to the proposed deviations to the modifications were made through the consultation (6 September – 18 October 2023, inclusive). However, at the first paragraph following the “Holiday lets” sub-section, a factual correction was identified. The text, “...over half	September– October 2023	<p>317 residences 106 were second homes (33%). By 2019 the ratio had risen to 358:134 (37%) (BCKLWN, November 2019).</p> <p>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).</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>An A 2021 internet search of holiday lets identifies 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.</p>

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			the village has permanent residents” ought to read “... <i>less than half the village</i> ”. This change, as a factual correction, has been duly made.		<p>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.</p> <p>With a current (2023) housing stock comprising 37% 36% second homes and also 14% around 17% holiday lets, only less than half the village has permanent residents. As with other parishes in the area, there is a widely held view that “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” (Brancaster Neighbourhood Plan) 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.</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,</p>

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					<p>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 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.</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 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.</p> <p><u>Evidence</u></p>

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					<ul style="list-style-type: none">As of January 2023, 134 125 of Old Hunstanton's housing stock are second homes. This represents 37% of the total housing stock of 358. (BCKLWN November 2019) is registered as second homes, representing 36% of the total housing stock (349 dwellings). <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><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><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></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
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					<table border="1"> <tr> <td>Old Hunstanton</td><td>349</td><td>125</td><td>35.8%</td><td></td><td></td></tr> <tr> <td>Titchwell</td><td>58</td><td>19</td><td>32.8%</td><td></td><td></td></tr> <tr> <td>Burnham Norton</td><td>69</td><td>22</td><td>31.9%</td><td></td><td></td></tr> <tr> <td>Burnham Market</td><td>672</td><td>188</td><td>28.0%</td><td>Policy 3</td><td></td></tr> <tr> <td>Ringstead</td><td>185</td><td>44</td><td>23.8%</td><td></td><td></td></tr> <tr> <td>Burnham Thorpe</td><td>101</td><td>24</td><td>23.8%</td><td></td><td></td></tr> <tr> <td>Choseley</td><td>13</td><td>3</td><td>23.1%</td><td></td><td></td></tr> <tr> <td>Docking</td><td>664</td><td>120</td><td>18.1%</td><td></td><td></td></tr> <tr> <td>Sedgeford</td><td>310</td><td>53</td><td>17.1%</td><td>Policy H8</td><td></td></tr> <tr> <td>Hunstanton</td><td>3,132</td><td>443</td><td>14.1%</td><td>No policy (reference paragraph 17)</td><td></td></tr> <tr> <td>Snettisham</td><td>1,603</td><td>142</td><td>8.9%</td><td>Policy NP04</td><td></td></tr> <tr> <td>Heacham</td><td>2,743</td><td>217</td><td>7.9%</td><td>Policy 4</td><td></td></tr> </table> <p>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"> Over 50 properties are advertised on the internet as holiday lets. This represents 14% of the total housing stock 	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	
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					<p>of 358 At early-January 2023 there were around 60 properties advertised as holiday lets, representing around 17% of the total housing stock.</p> <ul style="list-style-type: none"> 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. 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: <p><i>“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></p>

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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> <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</p>

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					on the local electoral register and being registered for and attending local services (such as healthcare, schools etc).
Policy 7 (pages 20-21)	Para 114: <ul style="list-style-type: none"> • Delete Policy 7 and replace with a Community Action, as below • Delete Justification and Evidence at the bottom of Page 20 • Replace deleted text with: <i>“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.”</i> 	LPA/ QB	YES, with the addition of text to emphasise the importance of community engagement/ consultation for proposals affecting the historic environment, in lieu of ERMs to Policy 4, as submitted	Textual changes	CONSULTATION <u>Justification</u> 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. <u>Evidence</u> <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. • Policy 7 Consultation • 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.

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					<div>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.</div>						
Policy 8 (pages 22-24)	Para 122: <ul style="list-style-type: none">Policy 8, change part a) to: “<i>following at least 12 months active marketing, it can be demonstrated that the facility is no longer viable; or</i>”Policy 8, last sentence, delete “...and would be consistent with other policies in the development plan...”	LPA/ QB	YES, with the addition of information to the Community Facility table regarding the Football Ground and Sport England’s priorities, in lieu of the deletion of Policy 3, as submitted	Textual changes	<div>Evidence...<ul style="list-style-type: none">Community facilities are defined below and located on Map 6.<table><tr><th></th><th>COMMUNITY FACILITY</th><th>IMPORTANCE TO COMMUNITY...</th></tr><tr><td>9</td><td>Football Ground, off A149/ Church Road (currently used by Redgate Rangers FC)</td><td>Local green space Supports physical activity Protection of playing pitches emphasised by Sport England as a priority...</td></tr></table></div> <div>Policy 8-5 Community Facilities</div>		COMMUNITY FACILITY	IMPORTANCE TO COMMUNITY...	9	Football Ground, off A149/ Church Road (currently used by Redgate Rangers FC)	Local green space Supports physical activity Protection of playing pitches emphasised by Sport England as a priority...
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					<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> <ul style="list-style-type: none"> a) 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 b) 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>
Policy 9 (Page 25)	<p>Para 138:</p> <ul style="list-style-type: none"> Delete all of the wording of Policy 9 and replace with: “<i>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</i> 	LPA/ QB	Policy 9: YES, subject to incidental changes to policy wording, associated with retention of principal residences policy (Policy	Textual changes	<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> <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</p>

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	<p><i>inappropriate in its village setting.</i></p> <ul style="list-style-type: none"> • Delete all of the Justification text and replace with “<i>The Neighbourhood Plan promotes infill development in Old Hunstanton Village. The Neighbourhood Plan requires development to respect its surroundings.</i>” 		<p>6, as submitted)</p> <p>“Justification” text:</p> <p>ERMs accepted, with the addition of guidance for the avoidance of cramping and over-development of plots, in lieu of the ERM changes to Policy 9 and deletion of Policy 10, as submitted.</p>		<p>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> <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>

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					<p>a) they would relate well to the neighbouring development in terms of height, scale and</p> <p>b) impact on the street scene, and, where applicable, would preserve or enhance the character or appearance of the Conservation Area, and</p> <p>c) 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>

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					New dwellings must be used as a principal residence (see Policy 4 New Housing as Permanent Dwellings).
Policy 10 (pages 26-27)	Para 143: <ul style="list-style-type: none"> • Delete Policy 10 • Delete all text on Page 26 	LPA/ QB	YES	Textual changes	<p>DEMOLITION & REPLACEMENT OF DWELLINGS & NEW DWELLINGS.</p> <p><u>Justification</u></p> <p>In recent years there has been a trend in Old Hunstanton to demolish existing dwellings and replace them with more dwellings or larger ones. In principle there is no objection to this form of development. However, if relatively small dwellings are replaced by very large ones the stock of smaller dwellings, and space between dwellings, is further eroded, and the housing mix further skewed towards larger dwellings unaffordable to local families or those wishing to remain in the community and downsize.</p> <p>It is also important that replacement dwellings do not give rise to an overcrowded or urbanised street scene which would detract from the character of the village.</p> <p>Other problems are the reduction of parking space and the desire to create further second homes and holiday lets (see Policy 6 New Housing as Permanent Dwellings).</p> <p>Ensuring space for adequate gardens means that dwellings are more conducive to permanent occupation and encourage a sustainable population by providing houses that would be suitable for families (see Policy 6 New Housing as Permanent Dwellings). There is also the opportunity to add to sustainability by growing</p>

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					<p>vegetables, and to encourage wildlife (see Policy 18 Protection and Enhancement of the Natural Environment and Landscape).</p> <p>It is, therefore, the intention to limit the footprint of any replacement dwellings to a reasonable proportion of the plot, judged to be no more than 40%.</p> <p><u>Evidence</u></p> <ul style="list-style-type: none"> 82% of questionnaire respondents felt it important for the Neighbourhood Plan to prevent the demolition of an existing dwelling and replacing with a greater number of dwellings so as to over develop the site. 74% of questionnaire respondents felt it important for the Neighbourhood Plan to prevent the demolition of an existing dwelling and replacing with a much larger dwelling so as to over develop the site. Adjacent parishes have found the need to include similar policies in their Neighbourhood Plans for the same reasons. <p>Policy 10 Demolition and Replacement Dwellings</p> <p>New, redeveloped and extended residential buildings should occupy no more than 40% of the plot unless it can be clearly shown that:</p>

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					a) there is a demonstrable need for the intended first occupants of the dwelling and b) the new building will not appear cramped or inappropriate in its setting in the village. c) or d) The property already exceeds this figure and will not be further added to. An increase in number of dwellings above those replaced is only acceptable where the resulting plot coverage does not exceed 40% (see Policy 9 Infill Development). Any additional dwellings must be used as a principal residence (see Policy 6 New Housing as Permanent Dwellings).
Policy 11 (pages 27-28)	Para 151: <ul style="list-style-type: none"> <i>Change wording of Policy 11 to “Residential development should be of a design, style and constructed of materials to ensure that it respects local character. The use of traditional materials, including sustainable locally sourced materials and the use of sustainable construction techniques will be supported.”</i> 	LPA/ QB	YES	Textual changes	<u>Evidence</u> <ul style="list-style-type: none"> 91% of questionnaire respondents liked use of traditional materials (carstone/chalk/flint) in new builds/extensions. 53% of questionnaire respondents disliked use of contemporary building materials (sheet glass/zinc/other metals/timber clad walls) in new builds/extensions. 56% of questionnaire respondents liked a mix of traditional and modern designs within the village. The importance of design in protecting the AONB is recognised in the NPPF paragraph 445 176 and Borough Council development plan policies. The highest design

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	<ul style="list-style-type: none"> • Evidence, fourth bullet point, replace the NPPF paragraph reference to “176” • Evidence, fourth bullet point, delete second sentence (“The highest...Area.”) There is no indication of what “the highest design standards” are and no indication of how a decision-maker might “particularly” apply such standards in the Conservation Area and/or not “particularly” apply them elsewhere. • Evidence, change fifth bullet point to “<i>See the Evidence supporting the Heritage Assets Policy earlier in the Neighbourhood Plan</i> for details of local....Statement.” 				<p>standards should be maintained in the plan area, particularly in Conservation Areas.</p> <ul style="list-style-type: none"> • See Policy 4 Conservation Area See the Evidence supporting the Heritage Assets Policy earlier in the Neighbourhood Plan for details of local, traditional materials identified in the Conservation Area Character Statement. <p>Policy 11-7 Design, Style and Materials</p> <p>Any new dwelling, redevelopment or extension to a dwelling should be carefully designed to blend in with adjacent properties and existing streetscape to maintain the character of the village, particularly within the Conservation Area.</p> <p>The use of traditional materials, especially those sourced locally, and of low ecological impact materials and techniques is to be encouraged.</p> <p>Consideration, however, will be given to exceptions to this rule in line with the National Planning Policy Framework. Residential development should be of a design, style and constructed of materials to ensure that it respects local character. The use of traditional materials, including sustainable locally sourced materials and the use of sustainable construction techniques will be supported.</p>

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Policy 12 (page 29)	Para 155: Policy 12, change wording to: “<i>The height of new and replacement buildings must be in keeping with the height of adjacent buildings and the character of the surrounding area; and must respect the amenity of neighbouring occupiers.</i>”	LPA/ QB	YES	Textual changes	Policy 12-8 Height of Replacement and new Buildings An increase in height over the replaced building will only be acceptable where this is compatible with the appearance of adjacent buildings and the amenity of their occupiers, unless allowed by permitted development rights. New buildings shall be of a suitable height to blend in with the existing surroundings. The height of new and replacement buildings must be in keeping with the height of adjacent buildings and the character of the surrounding area; and must respect the amenity of neighbouring occupiers.
Policy 13 (page 30)	Para 158: Policy 13, delete wording and replace with: “<i>Development should seek to reduce surface water run-off and incorporate sustainable drainage systems (SuDS) such as permeable driveways and parking areas, water harvesting and storage, green roofs and soakaways.</i>”	LPA/ QB	YES, with addition of “Water and Drainage” as policy title, for clarity (minor change)	Textual changes	Policy 13-9 Water and Drainage The policy has regard to national policy in seeking high quality design that is sympathetic to local character. Consideration, however, will be given to exceptions to this rule in line with the National Planning Policy Framework where appropriate. Development shall include design measures to reduce the surface water run-off and incorporate sustainable urban drainage systems (SuDS). Where plans do not include such measures, the onus is on the developer to explain why it is not possible to include them. These measures include permeable driveways and parking areas; water harvesting and storage; green roofs and/or soakaways. Development should seek to reduce surface water run-off and incorporate sustainable drainage systems (SuDS) such as permeable driveways and parking areas, water harvesting and storage, green roofs and soakaways.

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Policy 14 (pages 30- 32)	<p>Para 162:</p> <ul style="list-style-type: none"> • Policy 14, change first paragraph to: “<i>The protection and/or enhancement of the water quality, quantity, drainage, biodiversity, flood risk management and recreational value of groundwater, the River Hun, ditches and ponds throughout the Parish will be supported.</i>” • Policy 14, delete last sentence (“Consideration...Consent.”) • Justification, change last sentence to: “...charm. <i>The Parish Council will seek to ensure the protection and improvement of these and other water features.</i>” 	LPA/ QB	YES	Textual changes	<p><u>Justification</u></p> <p>Residents and visitors alike value the River Hun, a rare chalk stream (see Policy 18 Protection and Enhancement of the Natural Environment and Landscape) Likewise, the duck pond by the Church is one of the things that gives the village its quintessential olde worlde village charm. The health of these and other water features (listed below) must be protected and improved. The Parish Council will seek to ensure the protection and improvement of these and other water features.</p> <p><u>Evidence...</u></p> <p>Policy 14-10 Groundwater, the River Hun, Ditches and Ponds</p> <p>Development proposals that affect groundwater, the River Hun, ditches and ponds throughout the Parish will only be permitted if they preserve and enhance water quality and quantity, drainage, biodiversity, flood risk management and recreational value where the public have access. The onus is on the developer to evidence this. The protection and/or enhancement of the water quality, quantity, drainage, biodiversity, flood risk management and recreational value of groundwater, the River Hun, ditches and ponds throughout the Parish will be supported.</p> <p>Consideration for developments will also include ensuring that Water Management byelaws are adhered to and that any alteration of a watercourse would need Land Drainage Consent.</p>

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Policy 15 (page 33)	<p>Para 168:</p> <ul style="list-style-type: none"> • Policy 15, delete all wording and replace with: “<i>New dwellings must be capable of providing for high speed broadband. Development of “Fibre to the Premises” and connectivity speeds of at least 25Mbps, with potential to be upgraded, will be supported.</i>” • Add sentence after second sentence in Justification: “<i>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.</i>” 	LPA/ QB	YES, with additional “Justification” text to emphasise the Parish Council’s priority, to enable access to super-fast broadband for all.	Textual changes	<p><u>Justification</u></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> <p><u>Evidence...</u></p> <p>Policy 15-11 Mobile Phone and Broadband Provision</p> <p>New development will be encouraged to make provision to connect to the internet by ‘Fibre to the Premises’ and a minimum symmetrical speed of 25Mbps and have the potential to be upgraded to higher specifications. This would be demonstrated through a Connectivity Statement provided with the planning application.</p> <p>Old Hunstanton Parish Council will request Kings Lynn and West Norfolk Borough Council that any approval of any new or extended base station will contain a condition requiring shared network access among mobile phone operators.</p>

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					New dwellings must be capable of providing for high speed broadband. Development of "Fibre to the Premises" and connectivity speeds of at least 25Mbps, with potential to be upgraded, will be supported.
Policy 16 (page 34)	<p>Para 175:</p> <ul style="list-style-type: none"> Policy 16, delete wording and change to: "<i>The development of existing and new business within the settlement boundary and 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.</i>" Add to end of Justification: "<i>The Parish Council will seek to object to proposals for caravan parks that exceed Certified Location criteria (small sites for a maximum of five caravans for up to 28 days).</i>" 	LPA/ QB	YES, with amendments to policy presentation, to show policy requirements as separate criteria, in the interests of clarity and readability.	Textual changes	<p><u>Justification</u></p> <p>Local businesses are important to both residents and visitors, as well as to the wider local economy. Changes to existing businesses and the establishment of new businesses will be supported, providing they do not harm the existing character of the village or AONB.</p> <p>The Parish Council will seek to object to proposals for caravan parks that exceed Certified Location criteria (small sites for a maximum of five caravans for up to 28 days).</p> <p><u>Evidence...</u></p> <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

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					<p>c) is consistent in appearance with the character of any existing buildings on the site and those in the immediate neighbourhood</p> <p>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</p> <p>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> <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 the sustainable growth of business throughout the Parish will be supported, where this:</p> <p>a) Respects local character and does not result in a scale and intensity incompatible with the site and its surroundings;</p> <p>b) Does not appear prominent or intrusive within the AONB or its setting; and</p>

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					c) Does not result in significant adverse impacts on residential amenity, in terms of noise, odours, emissions, or highway safety.
Policy 17 (page 35)	<p>Para 180:</p> <ul style="list-style-type: none"> • Delete the wording of Policy 17 and replace with: <i>“Advertising and signage in Old Hunstanton should not harm visual amenity.”</i> • Delete the Justification and replace with: <i>“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 Old Hunstanton’s rural character.”</i> • Delete the last sentence of Evidence (“Signage...Hunstanton.”) 	LPA/ QB	<p>YES, with the following changes/ additions:</p> <p>Editing change to “Justification” text; i.e. “...ensures that they respect Old Hunstanton’s rural character”.</p> <p>Policy criteria from submission Plan provide guidance about how advertisements can be positioned to</p>	Textual changes	<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

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			minimise which, although they do not work as a planning policy do, nevertheless, provide useful good practice guidelines for erecting adverts.		<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. <p>Policy 13 Advertising and Signage</p> <p>Businesses are encouraged to consult Old Hunstanton Parish Council about the suitability of any proposed signage (see Policy 7 Consultation).</p> <p>Proposals for advertisements or signage should conform to the following:</p> <p>a) the siting, size, height, proportions, colour, materials and supporting structure of adverts and signs should respect the</p>

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					<p>character and appearance of the setting and, where appropriate the building to which they relate</p> <p>b) they should normally be provided only at points of access to sites, and located so as to minimise their visual effect on the environment</p> <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) illuminated signs will not be permitted (see Policy 19 Dark Night Skies).</p> <p>Advertising and signage in Old Hunstanton should not harm visual amenity.</p>
Policy 18 (pages 36-38)	Para 184: Policy 18, delete wording and replace with: “<i>Development should protect and enhance biodiversity and conserve natural landscape features, including ancient woodland, trees and hedgerows. Development must conserve and enhance the Area of Outstanding Natural Beauty</i>”	LPA/ QB	YES	Textual changes	<p>Policy 18-14 Protection and Enhancement of the Natural Environment and Landscape</p> <p>Development will protect, conserve and where possible enhance, the natural environment, local landscape and wildlife. All development within the Area of Outstanding Natural Beauty should protect and enhance the AONB. Likewise, any development adjacent to the AONB.</p> <p>The Council will encourage the diversity of trees to protect the overall health of the tree stock. Should any proposed development contain or abut any ancient woodland this should be protected apart from in exceptional circumstances There is a presumption against</p>

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	<i>(AONB) and development within its setting must respect the landscape character of the AONB.</i>				deforestation and tree planting is encouraged to mitigate climate problems. Development should protect and enhance biodiversity and conserve natural landscape features, including ancient woodland, trees and hedgerows. Development must conserve and enhance the Area of Outstanding Natural Beauty (AONB) and development within its setting must respect the landscape character of the AONB.
Policy 19 (pages 39-41)	Para 188: <ul style="list-style-type: none"> • Delete Policy 19 • Delete headings “Justification” and “Evidence” but retain text. • Replace Justification heading with “<i>Community Action: Dark Skies</i>” • Add new text above sentence “Light pollution can...”: “<i>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.</i>” 	LPA/ QB	YES – re-designation of Dark Skies Policy (19) as a Community Action is accepted. However, it is considered that Policy 19 criteria (as submitted), ought to be retained as supporting guidance/ best practice for minimising	Textual changes	DARK SKIES <u>Justification</u> Light pollution can obscure our view of the stars and planets, suburbanise the countryside, have a negative impact on the health of plants and animals, and cause annoyance to neighbours (Campaign to Protect Rural England). In common with much of the Norfolk Coast, Old Hunstanton has some of the least light polluted skies in England. This is an important element of its rural character and something which needs to be preserved (see Map 8). <u>Evidence</u> <ul style="list-style-type: none"> • 75% of questionnaire respondents felt it important for the Neighbourhood Plan to minimise light pollution from streetlighting and security lighting. • CPRE classify Old Hunstanton as having some of the least light polluted skies in the UK and actively campaigns to reduce light pollution in the Norfolk countryside.

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			light pollution.		<ul style="list-style-type: none"> • The need to address the impact of light pollution on the countryside is recognised in the National Planning Policy Framework (NPPF). Clause 185c states that planning policies and decisions should “limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.” • Norfolk County Council's Environmental Lighting Zones Policy recognises the importance of preserving dark landscapes and dark skies. • Likewise, Borough Council of Kings Lynn and West Norfolk's Policy DM15 (Environment, Design and Amenity). • The use of illuminated signs by businesses would be contrary to Norfolk Coast Partnership Forum guidelines state that illumination in signs can be unnecessarily obtrusive (see Policy 17 Advertising and signage). <p>Policy 19 Dark Night Skies</p> <p>In order to minimise light pollution all planning consents will be subject to the following conditions in respect of external lighting:</p> <ul style="list-style-type: none"> a) fully shielded (enclosed in full cut-off flat glass fittings) b) directed downwards (mounted horizontally to the ground and not tilted upwards) c) no dusk to dawn lamps

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					<p>d) white light low energy lamps (LED, metal halide or fluorescent) and not orange or pink sodium sources.</p> <p>Proposals including external lighting in prominent locations likely to be visible from the surrounding landscape will not normally be supported except where a requirement can be demonstrated in the interests of safety and security on public footways.</p> <p>Where internal lighting is likely to cause disturbance or risk to wildlife, including protected bird species, proposals will be sought for mitigating pollution from internal light sources. Large windows and roof lights are particularly relevant in this context.</p> <p>The use of illuminated signs by businesses will not be permitted.</p> <div style="border: 1px solid black; padding: 5px;"> <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> <ul style="list-style-type: none"> 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 </div>

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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 (pages 42-46)	<p>Para 198:</p> <ul style="list-style-type: none"> • Change title of Policy to “<i>Local Green Space</i>” • Delete wording of Policy 20 and replace with: “<i>The following sites, identified on Map 10, are designated as Local Green Space where development will not be permitted except in very special circumstances: Churchyard; Duck Pond; Allotments; Playground; and Football Ground.</i>” 	LPA/ QB	<p>YES, but change both title of section and policy, in the interests of consistency/ clarity (minor/ non-material change)</p> <p>Retention of footpaths information is also considered</p>	Textual and cartographic changes	<p>GREEN SPACES LOCAL GREEN SPACE</p> <p><u>Justification</u></p> <p>Green infrastructure contributes to the quality and distinctiveness of the local environment and to its ecology. The National Planning Policy Framework allows communities to designate local green spaces through Neighbourhood Plans to protect them for current and future generations (NPPF 98-99 and 101 to 103).</p> <p>The green spaces and footpaths of Old Hunstanton (shown on Maps 10 & 11) have been identified using National Planning Practice Framework criteria (para 100) given below. Local Green Space in Old Hunstanton (shown on Map 10) has been identified having regard to National Planning Policy Framework criteria (para 102) as below:</p>

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	<ul style="list-style-type: none"> • Provide a new Map 10, clearly identifying the precise boundaries of each of the above sites • Justification, end of second sentence change to: “...generations (NPPF 101 to 103).” • Change third sentence to “<i>Local Green Space in Old Hunstanton (shown on Map 10) has been identified having regard to National Planning Policy Framework criteria (para 102) as below:</i>” • Delete the rest of the Justification (“The Neighbourhood Plan...green space policy.”) • Evidence: delete third and fourth bullet points • Evidence: delete Golf Club, Hall and Park, Sand Dunes, Ringstead Downs and Footpaths references from Table 		useful information, the paths functioning as features that contribute positively to Old Hunstanton’s character.		<ul style="list-style-type: none"> • in reasonably close proximity to the community it serves; • demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and • is local in character and not an extensive tract of land • The Neighbourhood Plan does not seek to make an official green space designation for the listed sites as • all are in private or County Council ownership • many already have protected status (ie AONB, SSSI) • public rights of way are already protected under other legislation however, it does have a green space policy. <p><u>Evidence</u></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

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	<ul style="list-style-type: none">• Delete photo on Page 44• Delete Map 11				<p>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)."</p> <ul style="list-style-type: none">• 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><tr><th>GREEN SPACES</th><th>IMPORTANCE TO COMMUNITY</th></tr><tr><td>Churchyard</td><td>Forms part of the character and setting of a historic area Within Conservation Area</td></tr><tr><td>Duck Pond</td><td>Adds to local amenity Provides an attractive setting and outlook Within Conservation Area</td></tr><tr><td>Golf Club</td><td>Supports physical activity Encourages tourism Of ecological importance (eg orchids)</td></tr><tr><td>Hall and Park</td><td>Forms part of the character and setting of an historic area</td></tr></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	Golf Club	Supports physical activity Encourages tourism Of ecological importance (eg orchids)	Hall and Park	Forms part of the character and setting of an historic area
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					<table><tr><td></td><td>National Heritage List for England—listed park & garden Open to public on Thursdays Located within Conservation Area Located within AONB</td></tr><tr><td>Allotments</td><td>Providing opportunities for growing local food</td></tr><tr><td>Playground</td><td>Supports physical activity</td></tr><tr><td>Football Ground</td><td>Supports physical activity</td></tr><tr><td>Sand Dunes</td><td>Encourages tourism Important habitat for flora and fauna</td></tr><tr><td>Ringstead Downs</td><td>SSSI Norfolk Wildlife Trust reserve</td></tr></table> <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><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></table>		National Heritage List for England—listed park & garden Open to public on Thursdays Located within Conservation Area Located within AONB	Allotments	Providing opportunities for growing local food	Playground	Supports physical activity	Football Ground	Supports physical activity	Sand Dunes	Encourages tourism Important habitat for flora and fauna	Ringstead Downs	SSSI Norfolk Wildlife Trust reserve	FOOTPATHS		Peddars Way	Restricted byway 8 National Trail	North Norfolk Coastal Path	FP13 England Coast Path	River Hun footpath	FP10	The Buttlands	FP4
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Ringstead Downs	SSSI Norfolk Wildlife Trust reserve																										
FOOTPATHS																											
Peddars Way	Restricted byway 8 National Trail																										
North Norfolk Coastal Path	FP13 England Coast Path																										
River Hun footpath	FP10																										
The Buttlands	FP4																										

Section (page/ Policy reference in submission Plan)	Specific Modification for the NP to be compliant with the basic conditions as stated in the Final Old Hunstanton NP Examination Report July 2023 Where modifications are recommended, they appear in bold text . Where the examiner has suggested specific changes to the wording of the policies or new wording these appear in <i>bold italics</i> .	Who will make these changes? LPA or QB	Do you agree with the modification	What needs to be done to meet the specific modification?	Amendments and new changes made to the proposed Old Hunstanton neighbourhood plan (as submitted, August 2022).										
					<table><tr><td>Sandy Lane</td><td>FP6</td></tr><tr><td>Smugglers Lane footpath</td><td>FP3</td></tr><tr><td>Lovers Lane</td><td>Permissive pathway</td></tr><tr><td>Church Walk</td><td>Permissive pathway</td></tr><tr><td>Hamon Close to A149</td><td>Footpath</td></tr></table>	Sandy Lane	FP6	Smugglers Lane footpath	FP3	Lovers Lane	Permissive pathway	Church Walk	Permissive pathway	Hamon Close to A149	Footpath
Sandy Lane	FP6														
Smugglers Lane footpath	FP3														
Lovers Lane	Permissive pathway														
Church Walk	Permissive pathway														
Hamon Close to A149	Footpath														
					<p>Further details are available through the County Council's Public Rights of Way web pages (About Public Rights of Way - Norfolk County Council).</p> <p>Policy 20 Green Spaces 15 Local Green Space</p> <p>The areas listed above and defined on Map 10 are to be regarded as important green spaces for Old Hunstanton. Any development should respect them, help to maintain them, and enhance them.</p> <p>The following sites, identified on Map 10, are designated as Local Green Space where development will not be permitted except in very special circumstances:</p> <ul style="list-style-type: none">• Churchyard;• Duck Pond;• Allotments;• Playground; and										

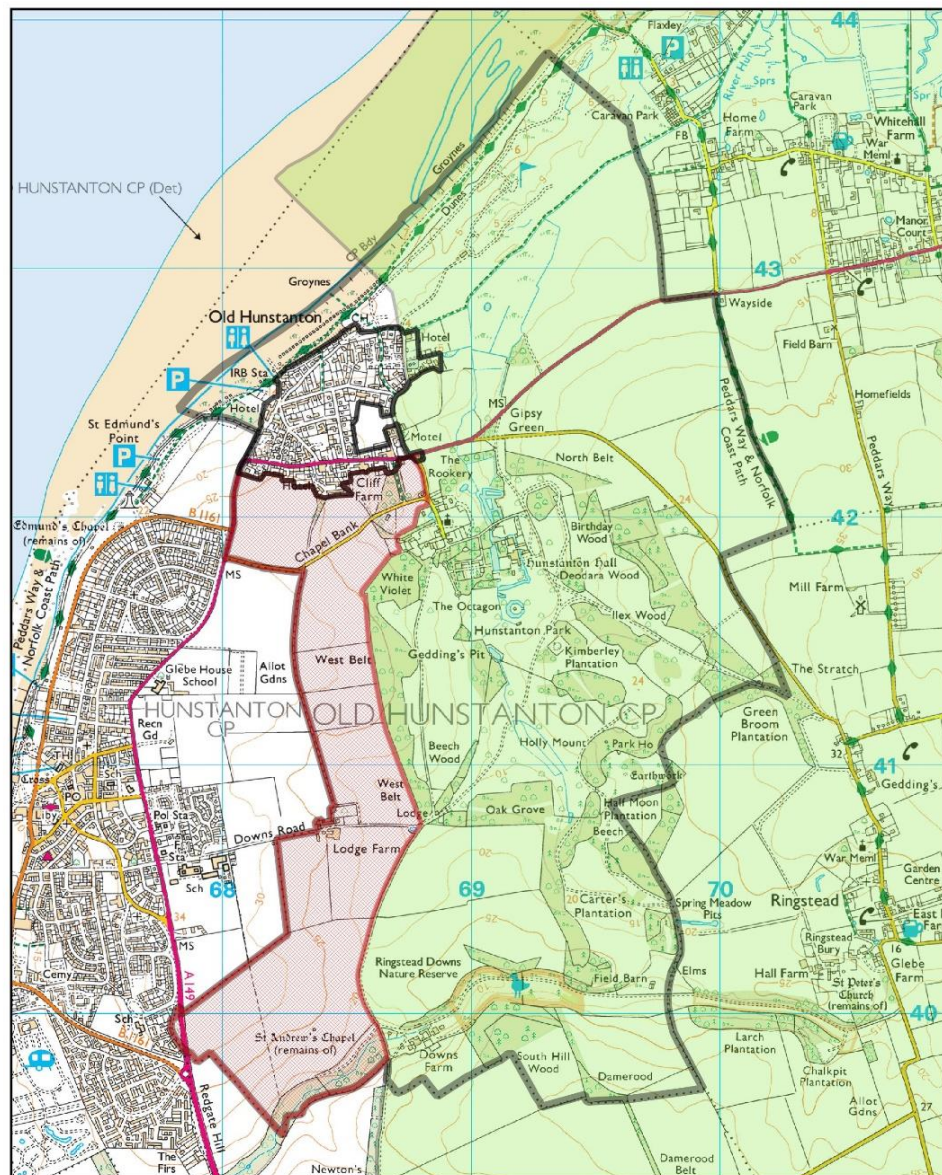
Section (page/ Policy reference in submission Plan)	Specific Modification for the NP to be compliant with the basic conditions as stated in the Final Old Hunstanton NP Examination Report July 2023 Where modifications are recommended, they appear in bold text . Where the examiner has suggested specific changes to the wording of the policies or new wording these appear in <i>bold italics</i> .	Who will make these changes? LPA or QB	Do you agree with the modification	What needs to be done to meet the specific modification?	Amendments and new changes made to the proposed Old Hunstanton neighbourhood plan (as submitted, August 2022).
					<ul style="list-style-type: none"> Football Ground. <p>[p44] River Hun footpath</p> <p>[[p45] Map 10 Local Green Spaces – Larger scale inset map, showing showing 5 retained Local Green Spaces in/ around the built-up area of the village, referenced in Policy 15 (Policy 20, as submitted)]</p> <p>[p46] Map 11 Footpaths</p>
Whole Plan	Para 200: Update the Contents, Policy, Page and Map numbering to take into account the recommendations contained in this Report	LPA/ QB	YES	Textual changes	<p>Changes to contents page:</p> <p>[[p46] Map 11 Foot Paths – Delete; Map 11 replaced by link to Norfolk County Council Public Rights of Way web page]</p> <p>Map 11 ————— Footpaths ————— Page 46</p> <p>Revised policy numbering shown within schedule (above).</p>

Appendix 3

Old Hunstanton Neighbourhood Plan: Inset Map Modifications: Maps 3 and 10

Map 3: Settlement Breaks [p10]





No changes to caption proposed, but map re-produced with areas B and C deleted:



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Map 3

-  Development Boundary
-  Area of Outstanding Natural Beauty
-  Old Hunstanton development break
-  Parish Boundary



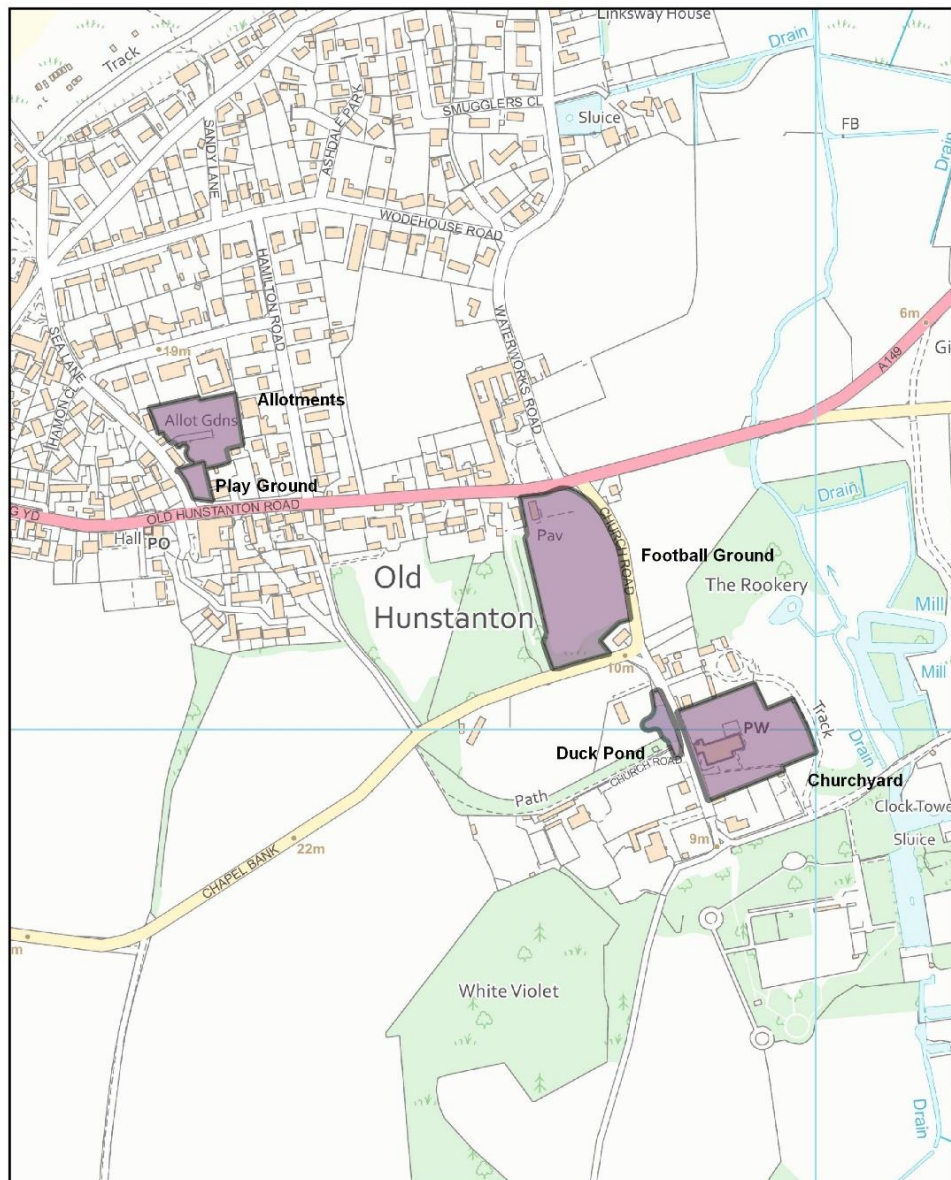
1:20,000

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Map 10: **Local** Green Spaces [p45]

Map reproduced, as follows:

- Header changes, as follows: “Map 10 Local Green Spaces”]
- Map re-produced at a larger scale, showing 5 retained Local Green Spaces in/ around the built-up area of the village.



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Map 10

Local Green Space



1:5,000

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