

**Examination of Kings Lynn & West Norfolk Local Plan Review**  
**Resumed Hearing**  
**Matters and Issues for Discussion**

**(Week 4: 16 - 19 April, 2024)**

**Response to Borough Council's proposals for updated versions of  
Policy LP02 and New Policy xxx Neighbourhood Plans (Outstanding  
issues from days 6 & 7 – 26-27 March 2024)**

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

**11 April 2024**

## Policy LP02

1. The Parish Council welcomes the Borough Council's proposed revisions to this policy which seek to address consultation comments relating to the distribution of windfall development and residential development outside development boundaries.
2. The revised policy addresses our main concerns about the lawfulness of LP02 in the context of the Localism Act and Neighbourhood Planning Guidance - by giving Neighbourhood Plan groups the ability to choose where development should be located within Designated Neighbourhood Areas.
3. It also addresses our concerns about inappropriately high levels of development on greenfield sites outside settlement boundaries in the AONB and sensitive rural areas where infrastructure and services would render it unsustainable and where it would be damaging to the National Landscape and the wider countryside – which is vital to the Borough's economy.
4. By focusing windfall towards the top three tiers of the Settlement hierarchy the Policy contributes to more sustainable patterns of travel because these tiers are, by definition, more accessible and better connected to services and employment.
5. At the very least this will open up a wider range of sustainable transport options for addressing pressure on the wider transport network which is a matter still under consideration.
6. Where development is allocated outside development boundaries through a neighbourhood plan we would like to see criterion (e) as applied to Tiers 1 to 3 settlements also applied to Tiers 4-6 in order to maintain the physical separation between settlements and to protect their identity.
7. The meaning of the sentence "This windfall policy does not apply to new residential development in the countryside" (clause 8 of 'Principles') is unclear and needs clarification. Similarly an explanation of what constitutes 'high quality' development is also needed.
8. Finally, given the 'Great Weight' attached by National Policy to conserving the AONB countryside should the criteria in part B of the policy make specific reference to the Norfolk Coast National Landscape?

## Policy XX Neighbourhood Plans

1. The Parish Council is content with the updated wording for this policy.
2. The figures in Table 2 (New Appendix xx) show an extant planning consent for one dwelling in Holme-next-the-Sea. However, this appears to be incorrect. An allocation of five dwellings has been made through the Neighbourhood Plan for which planning permission has recently been granted. In addition, a further new dwelling has

recently been completed within the Designated Neighbourhood Area. The Parish Council believes there is a further extant consent for a dwelling.

3. This in itself may not be an issue unless similar underestimation has occurred elsewhere in Designated Neighbourhood Areas.