

Borough Council of King's Lynn and West Norfolk

Local Plan Review. 2016 to 2036

1. The name Local Plan is not so clear as Local Development Framework because it is easily confused with Neighbourhood Plans. How local is 'local'?
2. There is no doubt that a considerable amount of time and thought has gone into the Local Plan Review 2016 -2036 but the document itself is so large, (not to mention the 29 supporting documents), it is very hard for ordinary people to read and digest.
A summary document would have been welcome outlining the major changes. Some sort of linkage to show how the Vision and Strategic Objectives have been carried into the Planning Policies would lead to a better understanding of the 'big picture'.
3. It is rather disheartening to look back at the Vision and Strategic Objectives in the 2011 Core Strategy and realise that little or no progress has been made in achieving some of the aspirations. Perhaps an analysis of what has been achieved and what is currently in progress would be of use.
4. Bringing the CS and SADMP into one document is sensible and useful. The order of the policies is clearer and more logical.
5. We did find the two column layout of the existing 2011 Core Strategy to be confusing.
6. We consider that the Local Plan should aim to be as comprehensive as possible so that it gives a clear picture of what development may be expected in that particular area during the currency of the plan.
7. In order to be comprehensive the Local Plan should, a) aim to anticipate which sites might come forward as windfall sites; b) take into account developments taking place as part of Regeneration or One Public Estate. c) incorporate the policies in the Neighbourhood Plans especially where a land allocation has been made as is the case in Holme, Sedgeford and Snettisham. The Neighbourhood Plans and the Local Plan should not proceed along parallel tracks but should relate to each other.
8. Although settlement boundaries are useful to provide clarity to potential developers as to what constitutes open countryside, some of the boundaries seem strange. The coastguard cottages in Hunstanton are not within a development boundary. Similarly the row of houses near to Ringstead windmill along the road to Holme are not within a boundary.
9. It is unrealistic to expect all development within boundaries to be foreseen and planned for in the Local Plan, but land capable of housing more than 10 dwellings i.e. a major development should be evaluated and noted.
In Hunstanton, the 49 apartments to be built on the bus station and the 32 apartments to be built on the southern part of Southend Road car park should be part of the plan and not counted as windfall sites. Similarly the Ischerwood's land, the sheep field, Witley Press site, Kit Kat site and Former infant school.

This is in addition to the allocations F2.2, F2.3, F2.4 which have been carried forward from the 2016 SADMP.

Not sure whether there may be similar areas in King's Lynn or Downham Market where the true scale of development is not represented in the Local Plan

10. Planning policies in the area often state the need for housing for local people, but the developers put in applications for homes that are too large and expensive for local people to afford. There are however no policies in the NPPF or Local Plan to enable the planning committee to find valid reasons to refuse such inappropriate development. For Hunstanton, the development of affordable housing on the Sheep Field should be a priority. There is concern that the carers needed for allocation F2.3 to function, will not be able to afford to live locally which raises the question of its sustainability.
11. Although para 4.1.13 says that all allocations policies include the words 'at least' before the proposed number of dwellings. This does not apply to some of the policies E1.5 Boal Quay, E1.6 South of Parkway, E1.8 South Quay, E1.10 North of Wisbech Road, E1.11 all in King's Lynn.
12. The number of windfall sites / developments must be quite erratic. Bringing these sites within the Local Plan would aid predictions and Local Housing Need projections.
13. The 2011 CS failed to predict that the Borough could be judged not to have a five year land supply. An analysis of what caused that failure would help to give confidence that the new projections in LP01 are appropriate. We need to see what happened, why and what are the ongoing potential impacts.
14. The importance of having a five year land supply should be explained.
15. The Local Housing Need calculates that some 539 dwellings need to be built each year over the 20 year period 2016 to 2036. We hope the sums are correct.
16. The statistics used in 2.1.3 and elsewhere are from the 2011 Census and need updating in order to make them relevant.
17. There may not be an absolute shortage of homes because the number of second homes has grown rapidly in recent years. Where there are an excessive number of second homes, the viability of communities is threatened. Although not a Borough wide problem it has a significant affect on the north west part of Norfolk. A restriction on the occupancy of new properties to be used as Principal Residences should not be left to Neighbourhood Plans but should be a Local Plan Policy to apply once the number of second homes in a parish exceeds a certain figure, perhaps 20%
18. Para. 2.1.11 states that Hunstanton has a dual function. We consider Hunstanton's function is four fold, a) it is a residential area, b) it is a dormitory for the sub-regional town of King's Lynn, c) it is a service hub for surrounding villages and d) it is a popular tourist destination. We need to look forward so that service provision (school places, medical centre etc) match up with how we want the town to develop to reflect all of these functions.

19. Para 2.1.11 mentions the 2008 Masterplan for the Town Centre and Southern Seafront Area. Because of the changes that have already occurred, that document requires to be reviewed and revised in order to make it valid.
20. Section 6 dealing with Hunstanton in Policy LP01 Spatial Strategy mentions improving visitor accessibility and public transport. We would wish to know how this might be achieved. The recent Borough led decisions to build apartments on the bus station and build apartments on the Southend Road car park appear to be quite contrary to this policy.
21. We consider LP17 -Coastal Change Management Area (Hunstanton to Dersingham) to be an important policy but we think that the occupancy restriction (1st April to 30 September) mitigates against investment in the South Beach Road area, it is not justified or logical if all the other criteria are complied with and it is unenforceable.
The southern boundary stops abruptly at SK 3-30 but there seems to be no logical reason for that.
If the occupancy restrictions are not to be abolished, there is a clear need for unanimity for the number of months caravans, tents and homes in the risk area are allowed to be occupied.
22. Residential mobile homes should be liable for a community charge on the same basis as homes.
23. The protection given to additional former railway trackbeds in LP 12 is welcome and hopefully they can be developed as footpaths or cycleways if not used to restore a railway.
24. The development at Knight's Hill E1.4 is missing from the Local Plan although the appeal by the developer was successful and the inspector's report has been endorsed by the Minister of Housing. It is difficult to imagine that development of that area will not happen.
25. There is a lot of similarity regarding the conditions under which development of allocated sites may take place. If these conditions were to be put into a key and indexed for each allocation, the document could be shortened and made more readable.
26. When the document is finalised, a short version just containing the main policies could aid wider understanding and be a useful reference
27. We are in general fully in support with the aims and objectives of LP16 – Norfolk Coast AONB-. We would support an application to revise the boundaries of the AONB. It seems anomalous that the striped cliffs at Hunstanton and that only a part of the coast in the Snettisham / Ken Hill area, which contains some of the richest wild life are, not included.
28. The House of Lords select committee on Regenerating Seaside Towns and Coastal Communities recognised that poor connectivity, both physical and digital, was a cause of young people moving from the area leading to a markedly skewed age distribution with 43% of residents in Hunstanton over the age of 65.

We do not know whether the young move out in order to obtain further education, seek employment or find accommodation that they could afford or a combination of these factors.

We consider that restoration of the rail link from Hunstanton to King's Lynn would improve connectivity, be an enormous boost to the local economy and take some pressure off the A149 which becomes seriously congested during the tourist season. The rail link should be part of Policies LP05, LP06, LP07, LP13 and LP40