

HUNSTANTON & DISTRICT CIVIC SOCIETY

Web site www.hunstanton-civic-society.org Charity Registered Number 1101087

Chairman	Andrew Murray	7 Bernard Crescent, Hunstanton	PE36 6ER	01485 532376	andrew.murray1@virgin.net
Secretary	Richard Webb	19 Downs Road, Hunstanton	PE36 5HX	01485 532144	richard.webb@phonecoop.coop
Treasurer	John M Little	14 Belgrave Avenue, Hunstanton	PE36 6DQ	01485 535974	j.little@tiscali.co.uk
Talks /Publicity	Martin Chown	Willow Tree Cottage Homefields Lane	PE36 5HZ	01485 532223	martin.chown@btinternet.com

Clare Cobley
Programme Officer
Borough Council of King's Lynn and West Norfolk
King's Court, Chapel Street
King's Lynn PE30 1EX

Dear Clare

Statement for the attention of Planning Inspector – Mr David Hogger

My responses to the questions posed by the inspector are as follows :-

1.4 There is insufficient detail in the SADMP to suggest that there will be a satisfactory mix of housing to serve the needs of different groups in the community in accordance with NPPF para 50.

1.5 In some sections of the SADMP, there does not appear to be sufficiently robust policies to conserve and enhance the natural environment as is required by NPPF paras 109-125.

2.1 The policies of the SADMP do not satisfactorily contribute towards sustainable growth in the Borough. There is a serious lack of thought given to the provision of public transport to connect the proposed large scale developments with the town centre or employment areas.

2.8 Very successful out of town retail centres in rural areas have developed where car parking is free and plentiful e.g Creake Abbey, Drove Orchards, Burnham Deepdale.

2.9 With reference to Development Management Policy DM11 and my previous submission number 501, Dr Bernard Devereux, an environmental scientist at the University of Cambridge, has drawn my attention to the direct contradiction of the Policy Approach C11.4 on page 36 “ ... new sites and extensions to and intensification of existing sites will not be permitted within the Norfolk Coast AONB, ...” and the paragraph on page 37 in DM 11 “ Small scale proposals for holiday accommodation will be acceptable within the Norfolk Coast Area of Outstanding Natural Beauty (AONB) “ I am sending under separate cover a document prepared by Dr Devereux which more fully details the concerns about holiday accommodation and the lack of reference to this important matter in the SADMP document.

2.10 Regrettably, the Norfolk County Council Highways Department does not carry out independent traffic impact assessments but relies on information supplied by developers that are at variance with local knowledge. Although a King's Lynn Land Use and Transport Study group have made some recommendations they are not up to date and the transport evidence is not robust.

2.11 Rail trackbeds are very important corridors for wild life and have the potential to be popular walking and cycling routes and at some time in the future to be re-opened as light or heavy rail routes. The trackbeds that should be protected include that from King's Lynn to Hunstanton, Heacham to Wells, Watlington to Wisbech, King's Lynn to Fakenham.

2.14 Waiting lists held by parish and town councils will not provide information on the need for allotments in new developments. An assessment will need to be made of the likely age structure of the new residents and the use of allotments by similar people.

2.16 The approach of the Environment Agency and the Council is too rigid with regard to coastal flood risk. The scientific basis of C18.8 is dubious..

3.3 There is considerable unexplained variability in the potential densities of the proposed development sites. This needs to be justified.

4.2 Insufficient consideration has been given to the provision of public transport to support large scale residential developments.

4.3 Again insufficient attention has been paid to accessibility of the town centre and the possibility of providing Park & Ride facilities.

5.1 The by-pass road for the A10 needs to be constructed prior to significant residential development and will not be effective if it feeds into the A47 and the Hardwick roundabout. It needs to link into the A148 and A149. In order for the large scale development to be sustainable, there must be a public transport system to link with the employment areas and the town centre.

10.1 The land to the north of Hunstanton Road, Heacham (F2,4) was originally not one of the preferred sites. Site F2.4 is on a distinct slope making it highly visible from the A149 approach to the town; the slope will discourage cycling and walking; the proposed access is from a roundabout on the A149 which will degrade the strategic route and residents will be more dependant on private car travel. The land east of Cromer Road (F2.2) land south of Hunstanton Commercial Park (F2.5) are more accessible and can be better integrated with the town of Hunstanton. There is compelling evidence that not only 'housing with care' is needed but also residential and specialised dementia is needed in the Hunstanton / Heacham area. Such use will provide year round employment for a variety of personnel and a fulfil a vital need.

25.1 I support the proposed development off Cheney Hill (G47.1) There is compelling evidence that more care facilities for the elderly are needed in the Hunstanton / Heacham area. The development of land off School Road was the subject of a planning appeal held in January 2015. In addition to the reasons that appeal was dismissed, the access past the Junior and Infant School is problematic. My submissions concerning F2.3 and F2.5 may be relevant to the discussion concerning sites in Heacham and I would be pleased to join in the discussion on Tuesday 28th if the inspector wishes me so to do.

I apologise that this response has been rather rushed. I intend to give some thought in the next couple of weeks into the ways in which the wording of the SADMP might be altered to make it a more sound document.

Kind regards

Andrew Murray (Respondent 260096)

1.0 What part of the SADMP is unsound

The policy statement in DM11,

“... small scale proposals for holiday accommodation will be acceptable within the Norfolk Coast AONB only where it can be demonstrated that the proposal will not negatively impact on the landscape setting of the AONB”

is unsound because the wording contradicts the policy approach set out in C11.4

“... it is proposed that new sites and extensions to and intensification of existing sites will not be permitted within the Norfolk Coast AONB, SSSI's and the flood hazard zones.”

Further, both the SADMP and the Core Strategy fail to provide an adequate plan for dealing with holiday accommodation (caravan parks, chalets and touring sites) which are a major issue for the future development and sustainability of Hunstanton and its neighbouring areas which are strategically located next to the North Norfolk AONB. This compounds the problem of having no current strategy/plan for development of the tourist industry for the Borough (plan currently in use ran to 2010 and hasn't yet been updated).

2.0 Why DM11 fails (point to the key parts of your original representations)

This section elaborates representation ID; 260096 (Mr. Andrew Murray on behalf of Hunstanton and District Civic Society) which refers to flood risk and caravan parks to the south of Hunstanton.

The Policy fails to recognise that there is (a) an existing over-provision of 'holiday accommodation' in the Borough that is becoming increasingly unsustainable and (b) providing any possibility of new accommodation to replace this in the AONB as suggested in DM11 will lead to development pressure on new sites in the AONB that is difficult to control and damaging. Damaging the AONB will damage tourism and the economy of the Borough.

2.1 The underpinning problems

Central to the issue are the disproportionately large holiday parks immediately adjoining Hunstanton and stretching south along the Wash shoreline. Those adjoining Hunstanton together with those at Heacham (just 1.3 km away) occupy a footprint similar to that of the entire built area of Hunstanton. *I.e. they cover an area similar in size to one of the Boroughs two 'Main Towns' yet they are barely mentioned in the SADMP.*

The Shoreline Management Plan (SMP) recognises that within these sites there is already *'a significant risk to life'* and that in the short term (to 2025) management could *'include considering the possibility of relocating some of these facilities out of the flood zone'*. However, *'... other interests could also be affected such as agricultural land use and historic assets'*.

As these problems become more acute, the attractiveness of these sites to owner/occupiers will diminish and the demand for new sites elsewhere in the Borough will increase. As the SMP suggests there is a need to have a coordinated and integrated strategy for dealing with this that will focus on how the sites can be supported and made more sustainable; how the tourist industry can be helped to maintain/diversify in terms of its investment in the infrastructure and crucially, how the sensitive environmental assets that make the area attractive can be protected from the consequences of adjustment. This is a potentially huge

problem that is starting to bite now and strong planning direction is needed to deal with it. Suggesting that a little bit of ‘small scale’ (and inevitably piecemeal) development in the AONB should be allowed over the next ten years would be a clear step in the wrong direction – even for those industry stakeholders who have called for it in their representations.

3.0 Which soundness criteria does it fail;

DM11 in its current form runs counter to the Core Strategy – in particular those policies relating to Hunstanton CS05; the Rural Areas CS06; Development in Coastal Areas CS07 and The Economy CS10. Further, because there is excess capacity (caravans and chalets) on the existing parks outside of the AONB (witnessed by on-going sales campaigns) and opportunities for development of new sites also outside the AONB, the Policy wording of DM11 will lead to conflict with NPPF PPG 11: Conserving and enhancing the Natural Environment, 116 which requires

“.....Consideration of such applications should include an assessment of.... the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way;”

4.0 How the SADMP can be made sound

SADMP can be made sound in the short run by

1. Retaining the Policy Approach set out in paragraph C11.4 of the SADMP as stated in the current document.
2. Reviewing the Core Strategy as proposed in the SADMP and creating a stronger policy framework for development of sustainable tourism that recognises the problems faced by this sector of the industry and provides a positive and supportive, framework for development in the light of consultation with the Tourist industry, other stakeholders, users and statutory bodies.
3. Informing (2) above by producing a coordinated Tourist Strategy for the area.
4. Refusing to open the door to unnecessary and damaging development of holiday accommodation in the AONB however ‘small scale’ until the basic planning issues raised here have been addressed.

This approach would also enable other issues facing this industry in Hunstanton and its surrounds to be addressed including visitor-related congestion on the A149 access route; seasonal highs and lows of demand on shops and services; diversification of tourism based on access to but not encroachment into the AONB and associated quality, year round opportunities for employment.

5.0 The precise change and/or wording that you are seeking

The sentence

“... small scale proposals for holiday accommodation will be acceptable within the Norfolk Coast AONB only where it can be demonstrated that the proposal will not negatively impact on the landscape setting of the AONB”

Is deleted from DM11.