



Representation Form

Consultation on Schedule of Main Modifications Part 1, August 2024

Closing date for submitting representations: 11:59pm, Wednesday, 2nd October 2024

Part A

Section 1: Contact information

	Respondent details	Agent details (where applicable)
Title:	Town Clerk	
First Name:	Jan	
Last Name:	Roomes	
Organisation (where relevant):	Hunstanton Town Council	
Address:		
Postcode:		
Telephone:		
Email:		

Part B

Please fill in a separate form for each site and/ or policy

Section 2: Representations

Which Main Modification are you responding on?

Main Modification (MM) ref	Local Plan Paragraph ref	Local Plan Policy ref (if applicable)	Policy title (as applicable)
MM5		4.1.21, 22 and 23	New Policy - Spatial Strategy and Settlement Hierarchy, and supporting text

To which test of soundness does your representation relate?

The Local Plan 2021-2040 is currently under examination by Planning Inspectors, appointed by the Secretary of State). The Inspectors will assess the proposed Main Modifications against the soundness tests. Please indicate whether you consider the proposed Main Modification about which you are responding is:

[Please tick appropriate box]	YES	NO
Legally compliant?		
Complies with the Duty to cooperate?		
Positively prepared (i.e. seeks to meet the area’s objectively assessed needs)?		
Justified (an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence)?		
Effective (i.e. deliverable over the plan period)?		
Consistent with national policy (National Planning Policy Framework: National Planning Policy Framework (publishing.service.gov.uk))?		

Summary of Comments:

Please give details of why you consider the proposed Main Modification that you are commenting on is sound (“Yes”) or unsound (“No”), with reference to the tests above. Please be as precise as possible.

A lot of time has been given to the local plan as originally submitted and while it was far from perfect. It considered the needs of Hunstanton as a major town and the issues it faces. The rewrite has whitewashed out in this section nearly all the considerations. Our situation is considerably different from the other major town, Downham Market, but in this rewritten plan policy you would hardly guess. Hence we felt the need to consider the plan and this policy in its current form as unsound (“no”) in all aspects.

A key paragraph in MM5, which replaces several polices states

“Away from Kings Lynn, Downham Market and Hunstanton are the Main Towns in the Borough with populations around 11,300 and 5,200 respectively (2021 Census). They both have a wide range of services, shops and employment opportunities with good public transport links. They are considered sustainable locations for growth and provide a significant role in supporting the needs of their residents and the residents in nearby communities in line with Policies LP39 and LP40. Both towns are expected to deliver local employment and housing growth appropriate to meet general needs, and to maximise opportunities for sustainable transport choices.”

Hunstanton is of a quite different nature to Downham Market the other main town in the borough. This statement above, seems to paint a picture of the town that is unrecognisable to HTC and I the residents that live here. Lets breakdown the response into parts.

Wide range of services – A number of must have services for a town like Hunstanton are struggling to survive. This is not because there are not enough people for them to be viable (In some cases much too many) but because recruitment is so difficult. The Doctors, vet, chemist and school (to name a few) all struggle to recruit, this is not because there is a shortage of housing or even because of the cost of housing but it is because the area around Hunstanton is very rural. Working in such a rural area means the chances of career progression are very limited and the only way it can be achieved is by moving to another area where jobs for career progression exist. This has been reflected in a large turnover of staff in all our services and the struggle to recruit.

Then there is consideration of other services such as banking, only one service handling cash and it is only open on certain days of week. Many other services are only available in the main town of Kings Lynn or even further afield.

Wide range of shops -Well there is not, a lot of the shops are focused on tourism and their owners work hard to make them a success. But to suggest a wide range of shops is misleading you can get the basics but quite often you have to travel to Kings Lynn or further afield for what would be for many essential items.

Good public transport links – Hunstanton is at the far north west corner of Norfolk, Contrary to the suggestion it does not have good public transport links. There is a bus service from Kings Lynn and this continues along the coast, but that is all. If you need to travel early or later hours, public transport all but ceases to exist. Travel to Kings Lynn and try to return in the evening and you are out of luck. Time taken to get to Kings Lynn is over an hour. Time to get to any major city is realistically two plus hours. Any where other than these locations and you are out of luck. Using public transport for work can be a major struggle.

Other forms of transport – Cycling, its hilly in this part of Norfolk and yes, you can cycle but to get anywhere meaningful would need a very long ride/commitment. Walking, only on a very local level, unless you have all day.

Local employment – Hunstanton is a Seaside Town, a significant amount of employment in town is related to service this industry, many of the jobs are seasonal and of minimum pay levels. The rural nature of the area and the distance of it from major transport networks limits the areas viability for other industries. Improved internet links offer possibilities for working at home, but fast reliable connections, despite investment, are still not available throughout the town.

Housing growth to meet local needs – This in the plan outline suggest a further 324 plus provision for 124 more houses for Hunstanton (details in MM143). Where are they to go?, we have almost developed up to our parish boundary lines in all directions. The only area that is not reaching the boundaries, just yet, is the eastern edge of town that borders the AONB (area of Natural Beauty). I have already mentioned the strain on local services. Increasing housing is not going to solve this issue but only make it worse. Over the last five years new housing stock in Hunstanton has already increased by over 500 with several hundred additional houses in the process of being built and not forgetting several hundred in the preceding years built. This level of growth cannot be matched by services and is not sustainable by the town.

Housing Need- We can then consider the type of development, as a town we have a number of new homes built for local residents only (starter homes) at the moment some still remain unsold. Additional stock often goes to people who are buying second homes or coming to the sea to retire with a small number of families, many working from home. All this puts additional strain on the already stretched local services.

Finally, social housing, some of this stock has have been lost to the right to buy scheme and the rest are looked after by housing organisations. There is good provision, the issue is that residents of the town need access to this housing, all too often the housing is let to those in immediate housing need from other parts of the borough. To remedy this there needs to be enough social housing in other parts of the Borough, so the needs of our own local residents is met. Putting people in need from Lynn and Downham in Hunstanton with our limited public transport, is not fair on them and will affect their ability to work and keep in contact with friends/family.

(Continue on a separate sheet if necessary.)

Please note you should cover succinctly all the information, evidence and supporting information necessary to support/justify your comments.

Which Main Modification are you responding on?

Main Modification (MM) ref	Local Plan Paragraph ref	Local Plan Policy ref (if applicable)	Policy title (as applicable)
MM143		LP40	New Policy - Spatial Strategy and Settlement Hierarchy, and supporting text

To which test of soundness does your representation relate?

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	[Please tick appropriate box]	YES	NO
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Positively prepared (i.e. seeks to meet the area's objectively assessed needs)?			
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Effective (i.e. deliverable over the plan period)?		
Consistent with national policy (National Planning Policy Framework: National Planning Policy Framework (publishing.service.gov.uk))?		

Summary of Comments:

Please give details of why you consider the proposed Main Modification that you are commenting on is sound (“Yes”) or unsound (“No”), with reference to the tests above. Please be as precise as possible.

Housing growth to meet local needs – This in the plan outline suggest a further 324 plus provision for 124 more houses for Hunstanton (details in MM143), where are they to go, we have almost developed up to our parish boundary lines in all directions. The only area that is not reaching the boundaries just yet is the eastern edge of town that borders the AONB (area of Natural Beauty). Local services are already strained, increasing housing is not going to solve this issue but only make it worse, but there seems no policy to deal with these issues. There is a commitment to increase housing stock but only a vague aim to tackle the strain on services.

Over the last five years new housing stock in Hunstanton has already increased by over 500 with several hundred additional houses in the process of being built and several hundred in the preceding years built. This level of growth cannot be matched by services and is not sustainable by the town. (Further detail in our response to MM5)

A lot of work in Hunstanton has been put into providing green corridors and increasing the biodiversity of the area. The original development plans did not take this into account and much has changed. This will be a factor in allocating land and needs to be explicitly defined to prevent loss of biodiversity and habitat.

We also need to consider type of housing – One aspect not considered by the plan is that of large Victorian/Edwardian properties (which the Town has many), with quite a few long term, on the market. In new development we do not need lots of large new build houses, we need to push potential buyers towards considering existing large housing stock and ensure stewardship of them for the future.

We need more precision in these areas and the needs of housing allocation before we can say yes, to the criteria of soundness for this policy and its relation to others in the plan. It is unclear what existing developments and projects granted permission for development are included in the number of allocated houses. The original allocations of land have now been developed or being developed. Hence, we need to say No to this policy in all aspects until the vagueness in the figures and the issues of possible land allocation is resolved.

Section 4: Data Protection

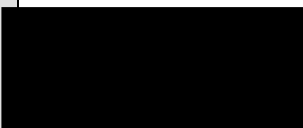
The Main Modifications consultations form the final stage(s) of the plan-making process for the Local Plan 2021-2040. Do you wish to be notified further about the Local Plan, at either of the following stages?

Publication of Inspector’s Report (anticipated January 2025)?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Adoption of Local Plan (anticipated February 2025)?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

In complying with the General Data Protection Regulation (UK GDPR) and Data Protection Act 2018, King’s Lynn and West Norfolk Borough Council confirms that it will process personal data gathered from this form only for the purposes relating to the consultation. It is intended to publish responses to this consultation on the Borough Council’s website. However, it should be noted that all personal information (except for names and organisation name, where appropriate) will not be published.

When you give consent for us to process data, you have the right to withdraw that consent at any time. If you wish to withdraw your consent, you must notify us at lpr@west-norfolk.gov.uk or 01553 616200.

Section 5: Signature and Date of Representation

Please sign and date below:	
Signature: (electronic signatures are acceptable)	
Date:	01/10/2024

Please note the following:

To be considered, your representation will need to be received by 11:59pm on Wednesday, 2nd October 2024.

The Main Modifications are being consulted upon in two parts. The Part 1 consultation covers all aspects of the Local Plan except Gypsies, Travellers and Travelling Showpeople, which will be subject to a separate Main Modifications (Part 2) consultation during autumn 2024.