

# HOLME-NEXT-THE-SEA

## NEIGHBOURHOOD PLAN 2016-2036

### PART A: INTRODUCTION TO THE PLAN AND BACKGROUND TO THE PARISH



Pre-Submission Consultation Draft

June 2019

## Foreword

Holme-next-the-Sea is a very special place with a wonderful environment, a small but active and cohesive community plus a thriving economy.

Although Holme is a small parish, it faces significant and complex challenges. Amongst these the resident population is coming under increasing pressure from external competition in the housing market, visitor pressure is mounting and our environment and property face threats from climate change and sea level rise. Increases in traffic, noise and falling biodiversity are all linked to these trends.

The Neighbourhood Plan provides a real opportunity to help to respond to these issues and for the whole community to develop a shared vision for the future. This means influencing the type and location of new development, how buildings should be laid out and what they should look like. It also means ensuring that our businesses can continue thrive and that new people can join our community and become residents of our parish. It means protecting our precious natural environment including green spaces and historic assets and most of all it means that both we and future generations can continue to enjoy the exceptional quality of life that Holme has offered in the past. Looking to the future it is inevitable that Holme will change. The Plan must ensure that it changes in a way that suits the needs and aspirations of our community and prevents unwelcome and inappropriate change from being thrust upon us.

This pre-submission document represents the outcome of three year's work by a Parish Council Working Party. During that period an enormous amount of research has been carried out to inform the development of the plan, we have consulted widely with stakeholders and we have received help and support from very many people. We have carefully considered all of the advice and comments that we have received throughout that time and we believe that the Draft Plan and the policies it contains are well balanced and grounded in solid evidence. Of particular importance the policies have been designed to reflect the very specific circumstances pertaining to our parish and they closely reflect the feedback from our parishioners as expressed through the NDP Questionnaire Survey and the consultation events held in 2017 and 2018.

Once adopted our Neighbourhood Plan will be incorporated into the Local Development Framework for Kings Lynn and West Norfolk and the policies it contains will be used in the determination of planning applications. It is very important therefore that it reflects the consensus views of our community and provides a sound foundation for a sustainable future. This Pre-Submission Consultation Draft represents a chance to have one more say on the content of the plan before it is formally submitted to the Borough Council and proceeds to independent examination and thereafter to referendum. We will consider all of your comments. Please therefore take the time to consider the contents of the Draft Plan and to let us know what you think.

Lynn Devereux

Chair, Holme-next-the-Sea Parish Council

## Acknowledgements

Creating a Neighbourhood Development Plan was first proposed at a lively and heavily attended meeting of Parishioners on 2 February, 2016. Getting the Plan to its current stage is the end result of coordinated efforts by the community and a wide range of contributions.

In no particular order thanks are due to all of the volunteers who have distributed flyers, helped set up consultation events, organised cakes and refreshments and attended meetings to provide ideas, constructive criticism and encouragement. Special thanks are due to Tony Foster for distributing information via the Village Information Network and for providing photographs from the village archives. Martin & Sally Crown and Robbie Burton also contributed historic maps, records and documents. Too many parishioners to mention have contributed local knowledge and understanding which has helped make the resulting plan relevant to the community, its history and its ideals.

Local organisations, businesses and individuals have also made a valuable contribution. The NOA and NWT have contributed their time, data, access to their land and field support to the NDP team. The late Peter Melchett of Courtyard Farm Trust provided advice and encouragement on conservation issues and Andrew Jamieson of Drove Orchards contributed ideas and helped to fill gaps in our local knowledge. Chris Witley and his team at the Witley Press have provided a sterling service printing and binding publicity and documents – often at very short notice but always with a smile. Hunstanton Town Councillor, Andrew Murray was a source of encouragement during the early stages, helping with ideas for the questionnaire survey and more recently, along with Sue Crump of Sedgford Parish Council, organised the loan of exhibition panels for our open days.

The community effort has been extensively supported by professionals from a wide range of organisations. Particular thanks go to Alan Gomm and Alex Fradley in the Borough Council's Planning Policy team. They have provided expert guidance and information and coordinated detailed and critical review of the proposed policies with their colleagues in Development Management. Nikki Patton, Karl Patterson, (Housing Strategy) and Richard Jermany (Shoreline Management Plan and flood risk) all provided advice and information for their specialist areas.

The team at Natural England in Norwich, including Tamara Rowson, Victoria Wight and Debbie Gosman helped develop our approach to formulating policies to protect and promote Holme's Natural Environment. Debbie in particular contributed practical support, many ideas and enthusiastic encouragement. This included written input to and feedback on evidence documents which has been extremely valuable.

The Norfolk Coast Partnership under the management of Estelle Hook, along with the Norfolk Rivers Trust (Ursula Juta) contributed support for water quality analysis and together, they managed to find funding for a programme of water quality testing on the River Hun and Broadwater Lagoon.

Gary Watson at the Environment Agency gave advice and help in formulating our approach to climate change and the Shoreline Management Plan. Despite having very many Neighbourhood Plans on his patch, Stuart Patience at Anglian Water found time to read and provide constructive comment on our policies.

David White at Norfolk County Council (Environment Team) provided data, advice on footpaths and visitor pressure issues which influenced our thinking. Jack Davidson in the National Trails Team supplemented the data. Also at Norfolk County Council the NBIS team (Lizzy Oddy, Martin Horlock and Sam Neil) provided excellent support with extensive biodiversity records and advice while Tom Townsend (Norfolk Records Office) and Peter Watkins (Historic Environment Service) provided significant data and support on heritage matters. Charis Abraham at Historic England also provided data and helpful advice in this area.

### **Neighbourhood Plan Team**

Lynn Devereux (Chair, Parish Council)

Christina Jones (NDP Project Coordinator)

Gill Morley (former Parish Councillor)

Bob Bowman (Parishioner)

Bernard Devereux (Parishioner)

Richard High (Planning Consultant)

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# 1 INTRODUCTION

## 1.1 The planning context

- 1.1.1 Neighbourhood Development Plans were introduced by the Government through the 2011 Localism Act. They signalled a new approach to planning that encourages local communities to play more of a role in shaping the future use and development of land in their own area. By developing a Neighbourhood Plan, even a very small parish such as Holme-next-the-Sea can map out a vision for its future and realise community objectives by formulating policies that reflect specific local circumstances and benefit from detailed local knowledge and understanding.
- 1.1.2 Neighbourhood Plans cannot block development. Having a Neighbourhood Plan does however mean influencing where new homes and other development should be built. This includes how development should be laid out, what buildings should look like and identifying and protecting the important environmental features, valued green spaces and other locally valued or historic assets. Once adopted the Plan forms part of the statutory planning framework and the policies and proposals it contains must be taken into account in the determination of planning applications.
- 1.1.3 All Neighbourhood Plans must satisfy a number of *Basic Conditions* set out in the Town and Country Planning Act 1990 which means that they:
- must have regard to national policies and advice contained in guidance issued by the Secretary of State, notably including the National Planning Policy Framework (NPPF)
  - must contribute to the achievement of sustainable development
  - must be in general conformity with the strategic policies in the development plan for the local area ie the Borough of Kings Lynn and West Norfolk in the case of Holme-next-the-Sea
  - must be compatible with human rights obligations
  - do not breach and are otherwise compatible with EU obligations including the following Directives - Strategic Environmental Assessment (SEA), Environmental Impact Assessment (EIA), the Conservation of Natural Habitats and of Wild Fauna (Habitats Directive) and the Conservation of Wild Birds (Wild Birds Directive)
- 1.1.4 The preparation of the Neighbourhood Plan has taken place against a backcloth of changes to relevant higher order plans and policy. It has been guided by The National Planning Policy Framework (*NPPF*) and the associated National Planning Practice Guidance (*NPPG*) published by the Ministry of Housing, Communities and Local Government (*MHCLG*) which towards the latter stages of preparation has undergone review (2018, 2019). In addition, as plans have been made to leave the European Union, which introduced and has controlled some of the most important levers of environmental policy, a 25 Year Environment Plan has been published by the Department for Environment, Food and Rural Affairs (*DEFRA*, January 2018). This is underpinned by Government's commitment to make ours the first generation to leave the natural environment in a better state than we found it.

- 1.1.5 The Neighbourhood Plan has also been prepared against the background of the ongoing review of the Kings Lynn and West Norfolk Local Plan (*the Borough Plan*). The adopted Borough Plan comprises two parts:
- The 2011 Core Strategy which provides the spatial planning framework for the development of the Borough up to 2026. This provides guidance on the scale and location of future development and strategic policies covering the environment, employment, infrastructure, and housing.
  - The 2016 Site Allocations and Development Management Policies Plan (*SADMP*) which provides detailed policies and guidance covering development management, development boundaries and site specific policies and allocations.

## **1.2 Holme-next-the-Sea Neighbourhood Plan**

- 1.2.1 The Parish Council (HNTSPC - *the Qualifying Body*) started to look into the possibility of developing a Neighbourhood Plan in 2015. The motivation came from concerns about the nature of changes that were taking place in the village and the mounting pressures on the resident community. These included the environmental impacts of what local people considered to be inappropriate development, the replacement of modest homes by top end properties beyond the reach of locals and retirees and what was perceived to be excessive growth in second homes. Linked to this, issues with the five year land supply in the Borough had led to unprecedented levels of speculative land acquisition for housing development and mobile accommodation giving rise to uncertainty about the future and encouraging some residents to seek out a less-pressured home environment.
- 1.2.2 On the other side of the coin a Neighbourhood Plan was seen as an opportunity to have a bigger say in shaping the character of the built and natural environment, to get the type of houses wanted by local people in the right locations and, very importantly, to create a more sustainable future for the resident community and the parish environment as a whole.
- 1.2.3 Work on The Plan started in earnest in spring 2016. In consultation with the Borough Council, despite the complexities of the natural environment which might have argued for a more limited approach, it was decided to designate the whole of the parish as the Neighbourhood Area (see map). Following a six week consultation period during which much encouragement and no objections were received, the Parish of Holme-next-the-Sea was designated as a Neighbourhood Area (the Neighbourhood Area) with effect from 24 April 2016.
- 1.2.4 The period covered by the Plan extends over 20 years, from 2016 to 2036. The time horizon was chosen to coincide with the update to the Kings Lynn and West Norfolk Local Plan which has been in progress since 2016 and which will incorporate provisions for Neighbourhood Plans which are made prior to its adoption.
- 1.2.5 The Plan has been developed through extensive consultation with residents, second home owners, land owners, developers and business interests as well as statutory consultees and other organisations with an interest in the Parish.
- 1.2.6 Details of the consultations, including material presented and feedback received can be found on the Neighbourhood Plan website (<http://www.holme-next-the-sea-plan.co.uk>)

along with downloadable reports which provide further background information and evidence to support the plan policies.



### Neighbourhood Area

## 1.3 The Evidence Base for the Neighbourhood Plan

- 1.3.1 Government's guidance on preparing Neighbourhood Plans notes that whilst "*there is no 'tick box' list of evidence required for neighbourhood planning, ...proportionate, robust evidence should support the choices made and the approach taken*" (Paragraph: 040 Reference ID: 41-040-20160211, MHCLG Neighbourhood Planning Guidance).
- 1.3.2 A wide variety of evidence has been captured to support the development of the Plan. This includes information from the following official sources.



- Official statistics including Census and Valuation Office Agency data published by the Office of National Statistics (ONS)
- Reports and data relating to the natural and historic environment supplied by statutory bodies including Natural England, Historic England and the Environment Agency
- Map data and aerial photography supplied under licence from Ordnance Survey and aerial photography and lidar data from the Environment Agency / DEFRA
- Information and plans supplied by the Planning Policy and Housing Strategy teams of the Borough Council
- Data supplied by Norfolk County Council, notably GIS records extracted from the Norfolk Biodiversity Information System (NBIS) and the Historic Environment Record (NHER)), socio-economic and housing data from the Norfolk Insight database
- Information on visitor numbers drawn from counts and surveys commissioned jointly by the Borough and County Councils, the Norfolk Wildlife Trust and National Trails.

1.3.3 In addition to the above, further surveys were carried out by the NDP Team. These included:

- A buildings survey which recorded the main types and features of existing development
- A survey to help identify property ownership (see NDP Housing Report)
- A field survey to support the validation of a map specifically developed as the basis for understanding the complex pattern of land cover and landscape structure in the parish (see NDP Environment, Landscape and Biodiversity Report)
- An investigation of water quality supported by the Norfolk Coast Partnership and the Norfolk Rivers Trust, based on a seven month period of sampling in the River Hun and Broadwater Lagoon (see NDP Water Quality Report)

1.3.4 Empirical evidence of community views and preferences has been collected as part of the ongoing consultation process. This included two surveys covering residents, second and mobile homeowners, landowners/developers and representatives of businesses and charity organisations operating within the Parish.



**Community consultation in the Village Hall (January 2017)**

- 1.3.5 The first of these, carried out in mid-May 2016 was designed to establish the wider views of the community about the parish both now and in the future, including likes and dislikes, role of the village, type of housing and the natural and cultural environment. A total of 206 completed questionnaire survey forms were returned representing a response rate of more than 40% of the total distributed to all houses, caravans and business addresses in the Parish. Details of the response, together with an overview (NDP Questionnaire Survey: Analysis and Overview of Findings, November 2016) can be found in a series of reports downloadable from the NDP website.
- 1.3.6 The second survey was carried out in January 2018 in conjunction with an exhibition which presented draft policies and proposed options for a small housing allocation. More than 80 people attended the event and 67 returned questionnaire forms that asked for views on the policies and preferences with respect to a housing allocation (see NDP Housing Report).

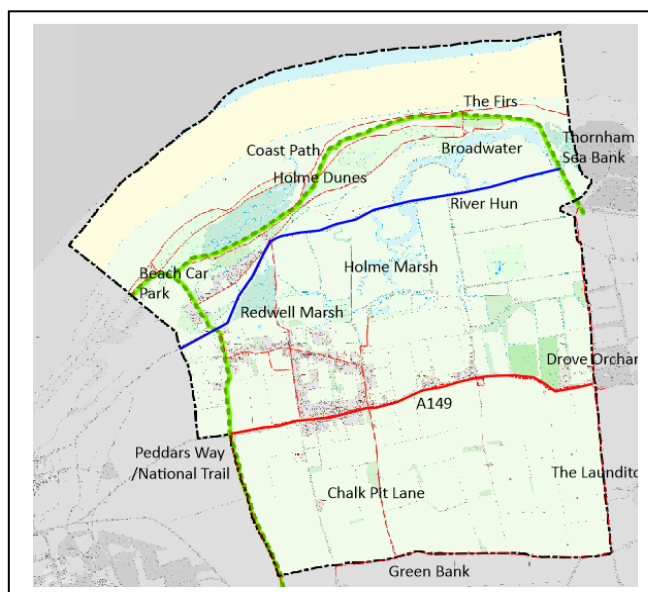
#### **1.4 Status and structure of this document**

- 1.4.1 This document is the Pre-Submission Draft Plan that is being publicised and consulted on prior to submission to the Borough Council of Kings Lynn and West Norfolk (*the Local Planning Authority*).
- 1.4.2 The Plan document is divided into parts as follows:
- **Part A – Introduction and Background to the Parish:** Following this introductory section, the remainder of Part A sets the scene by going on to describe the Neighbourhood Area and to examine the underlying changes that have been taking place. It concludes with a section summarising the issues and opportunities facing the Parish.
  - **Part B - Policies:** Presents the Vision and Objectives followed by the policies which are organised into Area-Specific (Zoning) and Area-Wide (General, Economic, Social and Environmental). Each policy wording is preceded by a short statement describing its purpose and is followed by supporting text which provides background together with brief justification and references to key higher order policy.
  - **Part C – Glossary:** Including a glossary of terms used in the Plan and a building style sheet.
  - **Part D – Maps / graphics:** Full size documents suitable for detailed use.
  - **Part E - Evidence Library:** This presents factual material in the form of reports used to inform the development of the Plan and to justify the policies. These are referenced at relevant points in the text.
  - **Part F – Supporting documentation:** Neighbourhood Area Designation, Basic Conditions Statement, Consultation Statement, SEA Screening Report (*to be completed at appropriate stage*).
- 1.4.3 All of the Neighbourhood Plan reports referenced in this document are available via the Neighbourhood Plan website (<http://www.holme-next-the-sea-plan.co.uk>).

## 2 HOLME-NEXT-THE-SEA

### 2.1 About the Parish

- 2.1.1 The small village of Holme-next-the-Sea lies on the Norfolk coast some 30kms north of Kings Lynn and 5 kms north east of the seaside town of Hunstanton. Situated within the Borough of Kings Lynn and West Norfolk, the Parish falls entirely within the Norfolk Coast Area of Outstanding Natural Beauty (AONB).
- 2.1.2 In 2018 there were less than 220 people on the electoral register and even fewer full-time residents. Despite its small size however, Holme is by no means a simple place and understanding the parish is a good place to start building a plan for its future.
- 2.1.3 In the Domesday Book of 1086, Holme-next-the-Sea was referred to as 'Holm', a Scandinavian name meaning a *small island, dry ground or river meadow*. The name provides a clue to the Parish's watery connections and is thought to have been adopted by invaders from across the North Sea sometime after the Romans left Britain.
- 2.1.4 In the north of the parish lies Holme Beach backed by sand dunes and drained freshwater marshes. This area includes the National Nature Reserve of Holme Dunes and a large brackish lagoon known as Broadwater. The River Hun, a rare chalk stream fed by natural springs, flows through the marshes to reach the sea via a sluice at Thornham Sea Bank.
- 2.1.5 The village is located centre west, adjacent to and partly within the marshes. Elsewhere there are a number of more isolated houses, and farmland including traditional grazed pasture. The village is divided on the south side by the A149 coast road, bordered by a line of houses which draw a tight boundary with the countryside. Beyond this boundary the topography rises from around 10m above sea level to reach a 50m high ridge known as Green Bank which offers stupendous views across The Wash to Lincolnshire. To the east, close to the boundary with Thornham, lies Drove Orchards, a diversified farm business comprising a traditional farm shop plus a variety of retail, restaurant and tourism activities.



**Sketch map of Parish indicating the location of selected features**

- 2.1.6 More than two thousand years ago Holme clearly was a place of some importance and today it remains well known for its historic connections, particularly with the historic route known as the Peddar's Way. The route follows the line of a Roman Road which runs south from Holme, over the hill via the neighbouring parish of Ringstead to Castle Acre and eventually to Suffolk. North of the village it passes through the marshes to meet the Norfolk Coast Path, forming an important link in the National Trail.
- 2.1.7 Holme's relationship with the Sea has always been an uneasy one – it is both asset and liability. The coast and the marshes contribute to an outstanding environment which supports a diverse array of Protected and Priority Species. This draws lovers of nature and wildlife and indeed underpins much of what goes on in the local economy. On the other side of the coin, the sea has brought destruction and misery to the parish's inhabitants, most recently in 2013 when the dunes were overtopped leading to flooding and damage to properties in the north of the village.
- 2.1.8 The first sea wall in Holme was raised in 1827 and improved some 40 years later, preventing the sea from invading the homes of its inhabitants. Today the village continues to depend on the sea defences for its survival but rising sea levels, climate change and coastal erosion pose new challenges for Holme's residents and their environment.

## 2.2 Community profile

- 2.2.1 Most of the information describing the socio-economic characteristics of the population today, and any underlying patterns or emerging trends, comes from the 2001 and 2011 Census Surveys. These are the only consistent and comprehensive source of published data on which to base a satisfactory analysis but there are some caveats on interpretation. Firstly, the survey is restricted to usually resident households (in the case of Holme this therefore excludes second home-owners) and secondly, the most recent data was collected in 2011 and change is ongoing.
- 2.2.2 Full details of the Census analysis carried out to inform the Neighbourhood Plan can be found in the NDP Report on the Socio-Economic Profile of the Neighbourhood Area. A summary of the key statistics is presented below.
- **Population:** In 2011 the Census recorded 239 people and 126 households normally resident in the Parish. The most striking feature revealed by the statistics is the huge fall in population between 2001 and 2011 (households -28%; all residents -26%).
  - **Household Size and Composition:** Average household size in 2011 was low at less than 2 and more than 80% of households contained fewer than 3 people, compared to 68% in the Borough and less than 65% in the Region. Only 10% included children.
  - **Age Structure:** More than 50% of the resident population was aged 60 or over in 2011, a 7% increase over 2001. The most marked feature of the age structure however is the lack of young people and the fall in the 25-44 year old group (-12%) between the two Census years.

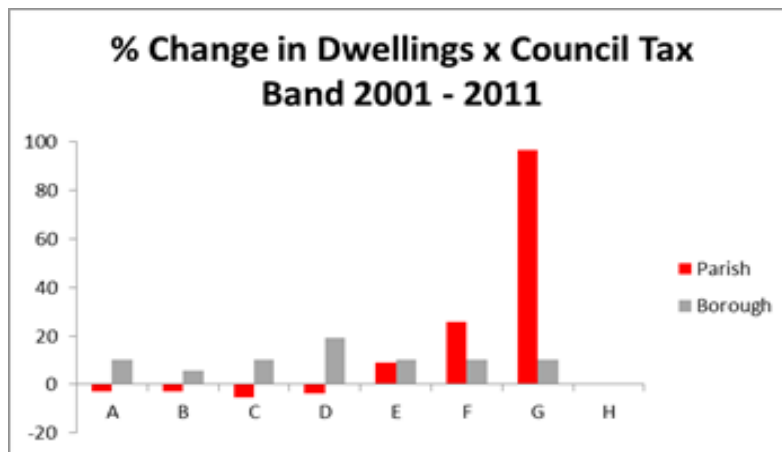
- **Economic Activity:** 38% of residents aged 16-64 are retired - almost twice the percentage for the Borough and two and a half times the figure for the Region. A particular feature of the economically active population is the very large proportion of self-employed residents, 18% in the Parish compared just over 10% in the Borough and the Region.
- **Occupation:** In 2011, 24% of working residents in Holme were classed as having management roles. A further 20% gave their occupation as professional. The proportion of residents in these two categories is approximately double that in the Borough and Region.
- **Employment Sectors:** By far the largest sector of employment for Holme's residents is the Wholesale & Retail trade (24% compared to 17% and 16% in the Borough and Region respectively), followed by Health & Social Work (14%), Accommodation & Food Services (13%) and the Construction sector (9%).
- **Place of Work:** An unusually large proportion of residents work mainly at or from home (14% compared to only 6% in both the Borough and the Region) - a good basis for sustainable development in a rural area that is poorly served by public transport.
- **Household Mobility:** Car availability is high in the Parish. In 2011, only 7% of households were recorded as having no access to a car or van and the overall proportion of 2+ car households in the parish (53%) is significantly greater than the comparable figures for the Borough and the Region (both c 39%).

## 2.3 Housing in Holme-next-the-Sea

2.3.1 Information on housing has been based on a combination of Census and VOA data, supplemented by local NDP surveys carried out in 2017-18. There are some definitional differences between sources but the emerging picture is consistent.

2.3.2 The main features are summarised below and details can be found in the NDP Report on Future Housing in Holme.

- **Housing Stock:** In terms of the *fixed housing stock* at the time of the 2011 Census, 69% of homes were classed as detached house or bungalow, 17% as semi-detached and 13% as terraced. The Census counted some 275 "*permanent structures*" in the Parish in 2011.
- **Residence:** Adjusting the Census count for household spaces with at least one usual resident (126) indicates that 149 permanent structures were not usually occupied in 2011 (ie 55% of the parish housing stock, was in use as a second home, holiday let or empty). Surveys carried out for the NDP in 2017 and 2018 suggest that this figure has grown to more than 60% (see NDP Economy Report).
- **Household Tenure:** 90% of all normally resident households in the Parish are home-owners – an extremely large proportion.
- **Size of Dwelling:** More than 33% of residents' homes have four or more bedrooms. In the Borough and the Region the comparable figure is only around 20%.
- **Changes in Permanent Dwelling Stock:** The composition of the dwelling stock in Holme is distinctly different from that of the Borough as a whole. Taking 2011, in Holme, less than 25% of dwellings fall within Council Tax Bands A and B and more than 25% fall in Bands F to H. In the Borough the comparable figures are 58% and 4% respectively. Differences in the pattern of changes through time are even more pronounced with the growth in Holme entirely within the higher Tax Bands (see Figure).

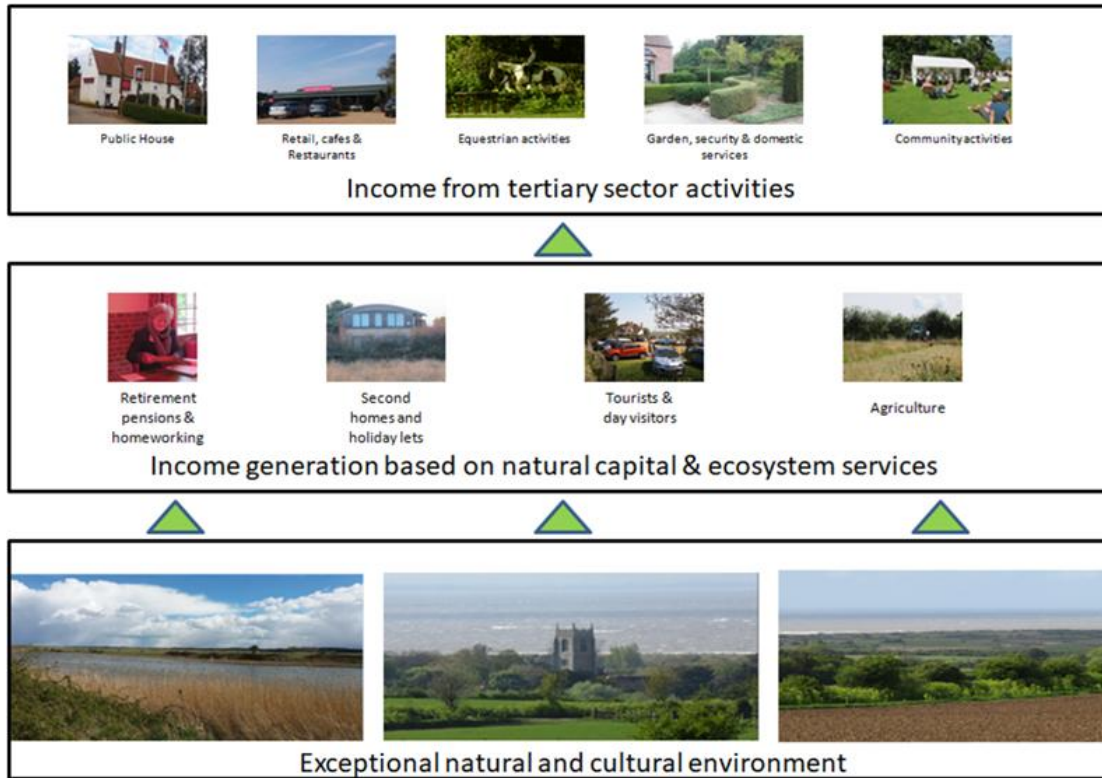


Changes in the housing stock – Holme vs Borough (Source: VOA)

## 2.4 Economy

- 2.4.1 Promoting a healthy economy is an essential element of achieving sustainable development and the NPPF sets out guidance for proactively encouraging sustainable economic growth.
- 2.4.2 At the time of the 2011 Census 42% of the resident population of Holme was employed. Just over half were working in sectors closely related to tourism and the elderly population where jobs generally are associated with low incomes. With some 52% of residents classed as retired it is clear however that Holme's main source of *income* does not revolve around the 'conventional' earnings model but rather one that relies on pensions and related investment earnings.
- 2.4.3 Another interesting feature of the economy is that the main activities which underpin the economic base all depend to a greater or lesser extent, either directly or indirectly on the natural environment which attracts retirees, second homeowners and property investors as well as visitors and the businesses which these support (see Figure below).
- 2.4.4 Income from pensions and investments makes a direct contribution to resident households. This plays the central role in the Parish economy, contributing to Council Tax, retail spend and purchase of household goods and services. Crucially, given the seasonal nature of the economy it provides a stable economic base throughout the year. Second homes (which account for over 50% of the parish's fixed housing stock) also contribute to the local economy and demand for employment, albeit at a lower level associated with frequency of visits.
- 2.4.5 In addition to around 135 mobile homes located on five sites in the parish (some of which function as second homes), around 20% of the fixed parish housing stock is marketed as holiday lets. This accommodation generates substantial levels of seasonal income and again contributes to the local economy via Council Tax, spend in local shops, and support for service companies as well as general tourist spend. Income generation is likely to be higher than for second homes due to higher occupancies but equally, pressure placed on local services and the environment is much higher. Moreover, most of the rental income benefits more distant parts of the UK.
- 2.4.6 Unchecked growth in second homes and holiday lets may bring economic benefits in terms of increased income. However, the social and environmental costs would be very

considerable - firstly in terms of damage to the viability of the *resident* community which has declined dramatically in the face of the associated competition in the housing market and secondly in terms of damage to the environment associated with increasing visitor pressure.



**Conceptual overview of the Parish Economy highlighting the dependence of economic activity on the natural and cultural environment**

- 2.4.7 The parish is home to two significant visitor attractions that generate income: Holme Dunes National Nature Reserve managed by the Norfolk Wildlife Trust and Drove Orchards mixed retail and leisure development. The Dunes income stream is probably the largest in the Parish but despite this, the majority of the direct income generated is spent outside. Furthermore it comes at substantial cost to Holme. Of the estimated 100 000 visitors pa, 80% arrive by car (Norfolk Wildlife Services, 2012) via the narrow village roads and at busy times the NNR car park overflows leading to uncontrolled parking in the village. On top of this much of the direct costs of providing/maintaining verges, dog bins, footpaths, bus stops etc falls directly on the village community. Visitor pressure and associated environmental damage is a recognised issue at the Reserve which as early as 1995 was classified as a ‘Red Zone’ in the AONB Management Plan.
- 2.4.8 Historically agriculture drove the economy and although in real terms farm incomes have declined, agriculture still plays an important role in the economy by supporting a small number of employees and importantly by helping to maintain the quality of the AONB landscape. Increasingly however, agriculture is coming under pressure for speculative development aimed at the second homes market. This trend not only poses a threat to

maintaining the best quality agricultural land but also to the AONB landscape and hence the attraction of the Parish as a visitor destination.

- 2.4.9 Income from retirement pensions, second homes, holiday lets, visitor spend and agriculture is clearly what drives the parish economy. There is virtually no secondary economic activity but a layer of tertiary activity has grown up which depends on these income streams and forms the basis for conventional and home-based employment in the Parish. This activity includes The White Horse Pub, Drove Orchards, equestrian activities, outdoor pursuits, property services plus a variety of other income generating activities mainly based around home office and studio working.
- 2.4.10 The Government's 25 Year Environment Plan (2018) advocates a natural capital approach to planning, recognising the importance of the environment as a natural asset and contributor to the overall economy. This chimes with the analysis above which demonstrates that almost all economic activity in Holme depends on the parish's natural capital. The monetary value of the ecosystem services that this supports is obviously very significant and well above their inherent intrinsic value. This suggests that based on its natural capital, the Parish is punching well above its weight and for its size generates disproportionately large benefits for the region.
- 2.4.11 Although the special nature of the environment provides an economic opportunity it also embodies a threat: inappropriate development for short run economic gain will quickly damage the environment, making it a less attractive place and undermining its economic potential.
- 2.4.12 Easy to overlook but important to recognise are threats to the continued prosperity of the parish that are linked to its deteriorating environment. The Protected Sites, particularly within the National Nature Reserve are at or exceeding carrying capacity in terms of visitor numbers and there is evidence of serious damage arising from development pressure (see NDP Parish Economy plus Environment, Landscape and Biodiversity Reports). Continued development and failure to address the issue of visitor pressure has already begun to impact negatively on the ecosystem services delivered by the sites and this in turn will reduce attractiveness to both visitors and residents impacting negatively on economic well-being.
- 2.4.13 A second major threat is climate change and associated sea level rise. The planned response outlined in the Shoreline Management Plan (2010) is likely to result in 42% of the Parish reverting to salt marsh and inter-tidal zone. This threatens c. 80 properties and will have a 'major negative' impact on key features of the Protected Sites. Notwithstanding the Cost-Benefit Analysis of the SMP, the economic impact of its realisation would be immense with a direct negative impact on Holme's environmental capital and income
- 2.4.14 Downgrading of the dunes sea defence function to "Managed Re-alignment" (see below) already represents a step towards reducing the value of the Parish's environmental capital and as the SMP concedes, the loss of habitats would also have a major negative impact. Without effective compensation and resilience planning this would substantially undermine the ecosystem services that support Holme's economy. *Ecological Compensation* for the impacts of the SMP is already being provided by expansion of alternative freshwater wetland habitats. These are distant from the Parish however and it is clear that no planning



has gone into the economic and social impacts on the local community whose amenity will be very significantly reduced.

- 2.4.15 Unless addressed the issue of Holme's weakening community will be compounded by accelerating environmental damage leading to economic decline. Short run economic gain could be achieved by giving way to mounting pressure for poorly controlled tourism development. Whilst benefitting businesses located largely beyond the Parish, this would damage Parish interests which depend on the environment as well as those of the broader community who value the related recreational opportunities and associated well-being benefits.
- 2.4.16 In keeping with the Governments 25 Year Environment Plan (2018), the NDP must ensure that the natural capital of the parish and the ecosystem services it supports are both protected and strengthened to ensure ongoing prosperity. Failure to protect will not only result in irretrievable damage to an environment of international significance but will also undermine its substantial contribution to the local economy. There is a strong case for a *precautionary approach*. Further details of the natural capital and ecosystem services approach may be found in the NDP Report on the Parish Economy.

## 2.5 Heritage

- 2.5.1 Holme's heritage also lends itself well to a natural capital approach in which the associated assets can be combined into four groups: The Conservation Area, Listed and Important Unlisted Buildings, Archaeology, Drainage Systems and Flood Defences. These assets contribute a broad spectrum of ecosystem services of which four are identified as being of national importance in Natural England's Character Assessments for Holme: Sense of Place/Inspiration, Sense of History, Recreation & Leisure and Biodiversity. These ecosystem services are important to the local economy and it is clear from the NDP consultation responses that they explain the considerable value that residents and second homeowners attach to parish heritage.
- 2.5.2 The Conservation Area stretches around the central part of the parish from Westgate in the north-west, eastwards via Kirkgate and then north via Eastgate to Main Road. Much of its character stems from the form of the settlement and use of locally found building materials including chalk and flint. However, the wealth of mature trees and hedgerows are a distinguishing green feature of the village which sets it apart from its coastal neighbours. The tightly defined boundary with the AONB countryside, punctuating green spaces and traditional grazing pasture all contribute to the character and feel of the place.
- 2.5.3 Including Grade I listed St Mary's Church, there are eight listed buildings within the Conservation Area and many "important unlisted buildings" which both singly and in groups play a key role in shaping its character.
- 2.5.4 The parish benefits from a wealth of fascinating archaeology, some of the best known and earliest being its rare Bronze Age timber circles which date back 4000 years and the Peddars Way (now part of the National Trail) which can be traced back more than 2000 years to Roman times. There have however been many earlier prehistoric finds across the parish and it is thought that a trackway along the boundary with neighbouring Ringstead coincides with a prehistoric ridgeway.

- 2.5.5 The Peddars Way is the first real evidence of a communications link between Holme and other places. It is of strategic significance by virtue of its length, the places it links in East Anglia and the fact it may have terminated in a port with a ferry across the Wash to Lincolnshire.
- 2.5.6 Examination of historic maps in conjunction with recently released Environment Agency lidar data indicates that the influence of the Romans on Holme's development has been substantial. Of particular importance, there is evidence that the first formal planning exercise for Holme was undertaken in Roman times and this explains the organisation of the parish landscape, including its distinctive rectangular configuration of roads and tracks as well as the associated form of the settlement.
- 2.5.7 That this pattern has survived is remarkable. Centuriation, a process of land compartmentalisation based on a rectangular network of roads is rare in the UK having largely been overwritten by village expansion plans involving infilling of punctuating green spaces and backland development. It has shaped the evolution of the settlement and its five-fold legacy is the organisation and structure of today's rich and distinctive parish landscape:
- A grid-based pattern of roads forming the basic building blocks of the landscape
  - The open form of village development with a linear though not repetitively regular arrangement of buildings facing village streets
  - A pattern of punctuating green, open spaces which are too small for modern arable cropping and have survived as traditional grazed grassland
  - Relatively small fields with many good quality hedgerows and copses that support a rich diversity of wildlife – especially birds
  - An excellent network of tracks, byways and paths offering a rich variety of attractive walks many of which present opportunities to re-connect to the historic landscape and help dissipate pressure on the Protected Sites.
- 2.5.8 Less is known about the parish through Anglo Saxon times and the Dark Ages though the discovery of a significant complex of fish traps on the beach indicates that Holme probably continued to spread eastwards along the fringe of the marshes remaining a small farming and fishing community. Following the Norman Conquest Holme was sufficiently established to be included in the Domesday Book in 1086 as a small community with 1.5 plough shares.
- 2.5.9 By the 16th century the village had started to expand southwards along Eastgate and west along Main Road, a pattern evidenced by surviving areas of ridge and furrow which suggest many years of a stable farming pattern based on open field systems.
- 2.5.10 In modern times two world wars have left their scars in fortifications along the coast. By 1928 the extent of the village was not dissimilar to that of 1798 but by 1939 growth had started to spread along Main Road and during the 1960's and 70's houses were built along the east side of the Peddars Way completing the characteristic layout of the village we know today. In the intervening period infill between existing houses has continued – latterly reinforced by Local Plan policies. Community views make it clear that this pattern should continue as the basis for organic growth.

- 2.5.11 The pattern of settlement is rare but has stood the test of time. Despite its historic origins it continues to provide a functional basis for accommodating growth, maintaining a sense of openness plus an attractive street scene and avoiding the problems associated with back-land development. It is valued by parishioners and compatible with Local Plan policy.
- 2.5.12 The sea defences and associated drainage works in Holme are of major significance in terms of the Parish's historic and cultural heritage as well as its security. They represent vision, toil, and investment by the local community over a period of several hundred years. Today they protect over 40% of the Parish, along with some 80 houses, from tidal inundation. They have enabled the creation of fresh water grazing marshes which provide a source of agricultural income and employment and also maintain an internationally important environment which is protected under the Birds and Habitats Directives.
- 2.5.13 During the 19th century several sea defence banks were constructed as part of the works to create freshwater grazing marshes and in 1860 efforts were made to reclaim the entire salt marsh north of Holme by constructing Thornham Sea Bank on which the parish continues to depend today for its protection from the sea.
- 2.5.14 The significance of this aspect of Holme's heritage cannot be overstated. Its management represents a major challenge to the NDP against the background of rising sea levels and the EA's Shoreline Management Plan (2010) which designates the northern dunes as 'managed realignment'. With ongoing coastal erosion and a substantial area of the parish at risk from tidal inundation there is a considerable threat to many of Holme's heritage assets and the associated ecosystem services which are so important to the local economy.
- 2.5.15 Holme's distinctive heritage assets define the character, sense of place and sense of history that deliver nationally important ecosystem services. From the consultations carried out to inform the development of the Neighbourhood Plan, it is clear that parishioners attach a great deal of importance to the historic aspects of their environment and feel fortunate to have access to such a rich and tangible heritage. This should be conserved for the benefit of future generations and opportunities should be sought to improve the parish's connections with its heritage, particularly by (re)connecting archaeological features in the AONB landscape with the historic route network.

## **2.6 Terrestrial environment and ecology**

- 2.6.1 Measured by any standards the Parish has an exceptional landscape, unusually high levels of biodiversity and remarkable wildlife. Its location, on the north east corner of the Wash facing the continent, makes it a key landfall site for migrating birds and it is recognised as a vital node in the Natura 2000 Network.
- 2.6.2 Not surprisingly, this environment is heavily protected and within the Parish there is an exceptionally large number of environmental designations. With 42% of Holme protected under International, EU and National law it is important to appreciate the significance of

these designations and ensure that the Neighbourhood Plan is in harmony with the objectives of the legislation.

2.6.3 Whilst other settlements along the Norfolk Coast also have close proximity to designated sites, Holme is relatively unusual because the form of the settlement is such that its northern extremity (Broadwater Road) is almost surrounded by European Protected Sites and the northern boundary of properties along Westgate and Kirkgate share boundaries with them.

2.6.4 The sites summarised below (which overlap to some extent ) have been officially *designated* or *defined* for conservation purposes (% coverage of the Neighbourhood Area is given in brackets). Details can be found in the NDP Environment Designations Report.

- **North Norfolk Coast Ramsar Site** (international significance, 42%): Includes key habitats (intertidal mudflats, beach/shingle ridges, dunes, salt marshes, grazing marshes and brackish lagoons) supporting a wide variety of Protected and Priority Species.
- **North Norfolk Site of Special Scientific Interest - SSSI** (national significance, 42%): Conservation objectives are set by Natural England. Of relevance to the NDP, the SSSI is surrounded by 'SSSI Impact Zones' where development may be judged to threaten conservation status.
- **North Norfolk Coast Special Area of Conservation - SAC** (European significance, 34%): Designation aims to ensure a coherent network of habitats for all species, but migrating birds are a key feature of the rationale. Damage to nodes or links in the chain of sites holds the potential to have a major impact on migrating species.
- **North Norfolk Coast Special Protection Area - SPA** (European significance, 41%): Protects migratory and threatened bird species. The single, biggest reason for damage to bird populations is development-related habitat fragmentation which is compounded by loss of hedgerows and woodland, traffic, intensive farming using agro-chemicals and use of pesticides.
- **Norfolk Coast Area of Outstanding Natural Beauty - AONB** (national significance, 100%): The main purpose of the designation is to conserve the natural beauty of the area's landscapes with special reference to landscape character, biodiversity, geodiversity and the historic and cultural environment. Issues identified as needing attention and management in the area around Holme are the impact of sea level rise and climate change alongside increasing recreational pressure from visitors and development. NPPF (para 172) indicates that for planning purposes AONBs have the same status as National Parks. Under the Countryside and Rights of Way Act, 2000 (CRoW) 'relevant authorities' (including Parish Councils) have a 'duty of regard' to conserving and enhancing their natural beauty.
- **North Norfolk Heritage Coast** (national significance, 60%): The role of Heritage Coasts is to conserve, protect and enhance the natural beauty of the coastline; the terrestrial, coastal and marine flora and fauna; and its heritage features. The remit also extends to promoting public enjoyment of the coast and conservation of its appearance/quality.
- **Holme Dunes National Nature Reserve** (national significance): The reserve includes some of the country's most important habitats and wildlife areas which enjoy the highest level of conservation protection under UK law. The remit is complex and

extends to supporting wildlife, conservation, research and tourism. Holme Dunes is managed by the Norfolk Wildlife Trust (NWT) and is also home to the Norfolk Ornithologists Association which operates the Holme Bird Observatory.

## 2.7 Water environment

- 2.7.1 Reference was made earlier to Holme’s watery connections and these lead to a further set of environmental designations and definitions which are described below.
- 2.7.2 **East Coast Shoreline Management Plan - SMP:** The non-statutory SMP incorporates a strategy for managing risk from coastal erosion and flooding subject to technical feasibility and funding. It divides the coast into ‘Super Frontages’ and Policy Development Zones (PDZs) and covers three ‘Epochs’ representing the short (2010-2025), medium (2026-2055) and long term (2056 -2105). It sets out policy options including *Hold the Line* (maintain existing defences), *Advance the Line* (build new defences), *Managed Realignment* (enable the shoreline to adjust to a more natural shape with less or no reliance on man-made defences) and *No Active Intervention* (let nature take its course).
- 2.7.3 Holme Dunes was downgraded to Managed Realignment in 2010. The first two epochs are directly relevant to the Neighbourhood Plan period. The third, because of its potential consequences (see Issues section below) calls for a precautionary planning approach in preparation for events beyond the Plan period (see Table).

Policy Development Zone	Epoch 1 Now To 2025	Epoch 2 2026 - 2055	Epoch 3 2056 - 2105
PDZ1a – Old Hunstanton Dunes	Hold the Line	Managed Realignment	Managed Realignment
PDZ1b – Holme Dunes	Managed Realignment	Managed Realignment	Managed Realignment
PDZ1c – Thornham Sea Bank	Hold the Line	Hold the Line	Hold the Line or Managed Realignment

### Policy Options affecting Holme-next-the-Sea in the Shoreline Management Plan (2010)

- 2.7.4 **The Wash and North Norfolk Coast European Marine Site - EMS** (European significance)  
This site effectively draws together a number of SPAs, SACs and SSSIs in and around the Wash to provide the area with protection under the relevant European Habitats and Birds Directives. The EMS focuses on their qualifying features in relation to specifically offshore, marine activities.
- 2.7.5 **Flood Risk Zones** (local significance): A significant part of Holme is in *Flood Zone 3* where there is a high risk from flooding in any year ie 1 chance in 100 or greater from rivers or 1 chance in 200 or greater from the sea (assuming no flood defences). A further area on the

margins lies in Flood Zone 2 which covers areas that would be affected by an extreme flood event happening with between 1 in 100 and 1 in 1000 chance of in any year.

- 2.7.6 Climate change is expected to cause rises in sea level of 4 to 8mm per year between now and 2055 (ie 8 to 16 cm in the NDP period) and this will have a number of impacts in Holme including increasing the risk of flooding in zones described above. Furthermore, climate change is also expected to bring about an increasing number of extreme weather events which will increase risk in vulnerable areas still further.
- 2.7.7 **Nitrate Vulnerable Zones** (local significance). Covered by the EU Nitrates Directive and the broader Water Framework Directive this designation aims to prevent pollution of surface and ground water by Nitrates. Within these zones limits are placed on the use and storage of those fertilizers which are the main source of water pollution by nitrates. Excepting the immediate coastal zone all of Holme is a Nitrate Vulnerable Zone because the underlying ground water is susceptible to Nitrate pollution. In parts it may be abstracted for drinking water and it also feeds freshwater springs and the River Hun which have the capacity to pollute the environmentally sensitive protected sites along the North Norfolk Coast.

## **2.8 Community facilities, recreation and transport**

- 2.8.1 There is a limited range of community infrastructure within Holme village: St Mary's Church, the Village Hall and The White Horse public house. In addition there are a number of green spaces which offer opportunities for quiet recreation, including Park Piece, purchased by the Parish Council some years ago and in part maintained in a semi-natural condition to encourage wildlife.
- 2.8.2 Around 1km to the east of the village, Drove Orchards offers a surprising number restaurants and retail outlets. The site is accessible only by road from Holme and in response to the Neighbourhood Plan Survey there were a number of suggestions and requests for a footpath/cycleway to improve access from the village.
- 2.8.3 There is an hourly coastal bus service providing a link to Hunstanton some 5km to the west and Wells-next-the-Sea, 20km to the east. Both provide a range of services including shopping, public library and health care. There is however no public transport serving the Reserves or the beach and as all of the publicly available car parking space lies to the north of the village this means that the 80% of visitors arriving by car must pass through the narrow village roads and tracks.

## **3 ISSUES AND OPPORTUNITIES FOR THE NEIGHBOURHOOD PLAN**

### **3.1 Key issues**

- 3.1.1 The background research carried out for the Plan, together with feedback received from the NDP consultations, has highlighted (and confirmed) a number of inter-related problems and issues facing the Parish, both now and in the future. Not all of these can be dealt with by the Neighbourhood Plan but many can be taken on board and addressed by NDP policies.

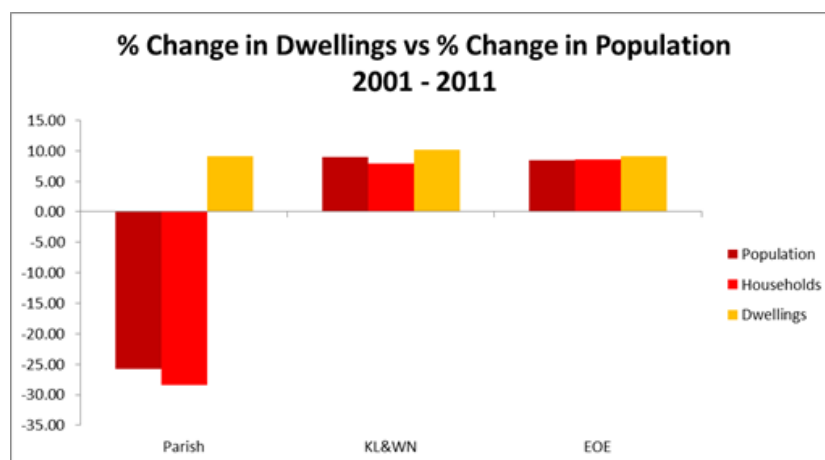
## 3.2 Imbalance in the resident population and housing stock

3.2.1 There is growing imbalance in the population and housing stock evidenced by the following:

- A decline in resident population (-26%) and households (-28%) between 2001-2011
- A reduction in the 25-44 year olds group (-12%) and an increase in the 60+ group (+7%)
- A majority of the fixed housing stock (55%) in use as a second or holiday home (or empty)
- A disproportionately large element of mobile accommodation (greater than the number of homes with at least one usual resident)
- A mismatch between housing stock and household size (75% dwellings have three or more bedrooms, 83% of households consist of two or fewer people)
- An imbalance in the housing supply reinforced by growth in the higher Council Tax Bands

3.2.2 It is important to note that despite a 28% reduction in resident households between the Census periods, there was a growth in the overall dwelling stock of almost 10%. This reinforces the point that residents are being excluded from the housing market - the growing imbalance in the housing stock and a housing market driven by external demand is restricting the opportunities for young people and intending retirees to enter the market.

3.2.3 The trend is in stark contrast to that experienced throughout the Borough or the Eastern Region as shown in the Figure below. It is weakening the resident population and undermining the social cohesion of the community as a whole. As retirement incomes provide an important source of stability in a seasonal economy it also has implications for the economic performance of the Parish.



### Imbalance between resident population and housing (Holme of the Borough and Region)

Source: Census and Valuation Office data, 2001 – 2011 (ONS)

## 3.3 Visitor pressure and damage to the environment

3.3.1 Visitor pressure and associated environmental damage is a recognised issue in the Parish, notably in relation to the Protected Sites.

- As early as 1995 Holme Dunes was classified by The Norfolk Coast Partnership as a 'Red Zone' (AONB Management Plan, 1995) where 'fragile habitats' of 'almost wholly

*international importance* were under *considerable visitor pressure*. NCP guidance indicated that the Site should not be promoted and that car parking should be reduced on-site and nearby.

- In 2012, Norfolk Wildlife Services highlighted the very sensitive nature of Holme Dunes in terms of its ecology based on a narrow consideration of impacts on the *Qualifying Features* of the Protected Sites (NWS Review of Visitor Pressure, 2012).
- In 2015, the EIP for the SADMP raised concerns about possible recreational pressures associated with new housing allocations. A package of measures to mitigate potential impacts on the Natura 2000 sites was subsequently agreed (see SADMP Policy DM19) and as part of this The West Norfolk Habitats Monitoring & Mitigation Fund was established. The fund covers impacts on Holme Dunes but is not designed to mitigate for the much greater effects of general tourism-related pressures.
- More recently Natural England has published the results of its investigation into the State of the North Norfolk Coast (2018/19). Against a background of declining biodiversity UK-wide, this provides important new evidence of declines and damage to the County's Protected Sites including specific evidence relating to Holme Dunes (habitats and wildlife) consistent with the findings of the NDP Team's research (NDP Environment, Landscape and Biodiversity Report). Natural England has concluded that the environment and the ecosystem services which it delivers are facing growing challenges and conflict and warns that if we do not act to manage the impacts effectively, it is not just the natural environment that will have a poor outcome, but also the people who live within and visit it.

3.3.2 In response to the NDP Questionnaire Survey, 85% of respondents considered it very important to adopt a positive approach to managing local habitats and wildlife. 78% considered it very important to adopt a positive approach to managing the landscape. Lack of planning control over biodiversity impacts, improvements to The Hun and associated habitats and proposals for Green Corridors were all raised as specific issues to be addressed by the NDP.

3.3.3 Visitor pressure is also linked to a broader range of negative environmental impacts, notably including traffic and various kinds of pollution. Given the lack of consistent and comprehensive data describing visitor numbers, it is difficult to isolate these from impacts due to changes in background levels of growth. It is however clear that the situation today is significantly worse than it was 20 years ago.

3.3.4 In recent years traffic conflict in particular has grown. During the peak tourist season when the Reserve car parks fill, the NWT has been forced to close the narrow access track to The Firs Visitor Centre, leading to further traffic conflict and uncontrolled, overspill parking in the village.

3.3.5 Damage to verges and residents' properties as a result of uncontrolled and inconsiderate parking is a recurrent source of complaint and there are growing concerns for the safety of pedestrians and other road users who share the narrow village roads. These traffic problems will continue to grow as an issue for the Parish (especially the village) unless they are addressed more effectively than they have been to date.



### **3.4 Pollution and water quality**

- 3.4.1 Pollution and water quality have become a particular issue for the Parish. In principle Holme's underlying chalk geology should lead to excellent quality water draining into the marshes and the River Hun. Water in the river, local drainage ditches and the coastal lagoons is however heavily polluted with nitrates and phosphates (see NDP Water Quality Report) related to a diffuse range of sources including farming practices and the sewerage system.
- 3.4.2 Broadwater Lagoon, a qualifying feature for the North Norfolk SAC has recently exhibited a persistent algal bloom due to excessively high levels of phosphorous and the Hun itself suffers from Nitrate levels that are well above Water Framework Directive standards. These once thriving water bodies are now virtually devoid of aquatic life.

### **3.5 Climate change, coastal erosion and flood risk**

- 3.5.1 Given that much of the Parish lies in Environment Agency Flood Zones 2 and 3 and also that climate change is expected to accelerate associated rises in sea level, the risks posed by coastal erosion and tidal flooding in Holme are anticipated to increase over the Plan period.
- 3.5.2 Flash flooding is also a concern in parts of the Parish. The east-west escarpment which forms Holme's most prominent geological feature is dissected by dry valleys which run from south to north and during extreme rainfall events these valleys can carry significant volumes of flood water down into the lower lying parts of the village. Again this problem is likely to increase as climate change progresses.
- 3.5.3 The National Planning Policy Framework aims to discourage most types of development in Flood Risk Zones requiring that a 'sequential test' and/or an 'exception test' must be passed before development can take place. Minimising flood risk to the community and property and managing surface water run-off are clearly high priorities for the NDP (see NDP Environment, Landscape and Biodiversity Report).

### **3.6 Risk of tidal inundation**

- 3.6.1 If anyone living in Holme had become complacent about the risk of tidal flooding, the December 2013 floods provided a wake-up call. The overtopping of the dunes just inside The Firs approach road and the inundation of Lavender Marsh resulted in flooding and damage to properties on Beach Road and Broadwater Road (which was cut off) and the retreating waters deposited debris and silty deposits in their wake.

Based on discussions with the Environment Agency (February 2017) it is understood that the *intention behind* the SMP policies is to ensure ongoing maintenance and protection of Thornham Sea Wall in the medium term (Epochs 1 and 2) and to review the situation towards the end of Epoch 2. The dunes (also critical to the ongoing defence of Holme) will be maintained but there is no funding available to improve their defence function to cope with sea level rise. The policy is subject to funding and technical feasibility.

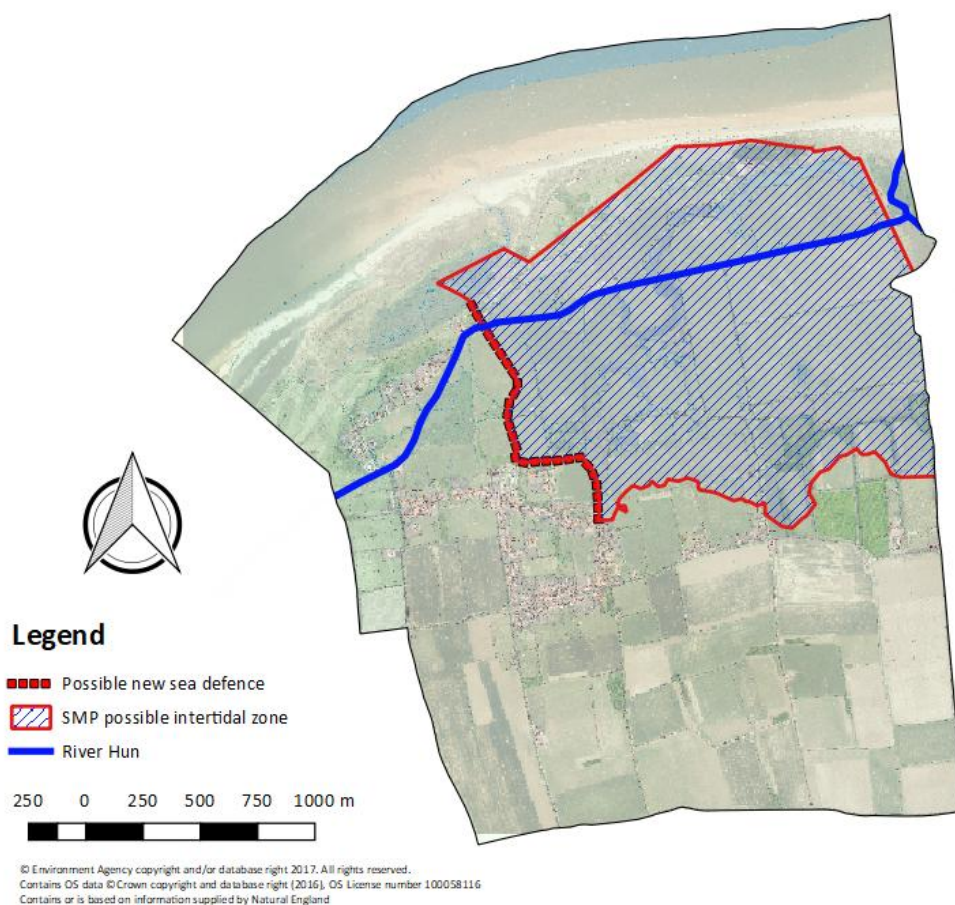
- 3.6.2 Currently there is a budget to cover recurrent costs of maintenance but finance may not be available to cover the costs of any major capital investment. Current funding arrangements

may change in the future but with sea level rising and no capital pot to fund improved defences to match, the threat is very real.

- 3.6.3 There is significant uncertainty about what will actually happen in the event that the Sea Defences fail but more than 40% of the land area of the Parish could be affected by tidal inundation.
- 3.6.4 Responding to the threat posed to property is clearly of paramount importance when planning for the future. There would however be further stings in the tail of a tidal inundation.

## SHORELINE MANAGEMENT PLAN

### INDICATIVE INTERTIDAL ZONE



- 3.6.5 Firstly, according to the Strategic Environmental Assessment (Addendum) of the SMP, these changes will have a major negative effect on the European Protected Sites, turning Broadwater Lagoon plus a significant area of grazing marsh, into saline intertidal mudflats/marsh. This would impact negatively on a significant number of qualifying species that depend on these and other habitats that would be affected.

- 3.6.6 Secondly, there would be a very significant loss of amenity for both residents and visitors with potentially serious consequences for the local economy. The Habitats Directive (92/43/EEC) and the Birds Directive (2009/147/EC) require that mitigation and compensation measures be put in place for any action that would damage the qualifying features of the Protected Sites. Creation of similar, replacement habitat elsewhere might meet this compensation requirement – but it would certainly not address the huge economic and social impact on the Parish of Holme (see NDP Parish Economy report). Assuming appropriate habitat could be created, planning and implementation would need to begin now to give any certainty of success.

### **3.7 Dependency on the environment**

- 3.7.1 The fact that the local economy is driven by the natural environment is not in itself an issue. However In terms of sustainable development the evidence suggests that the Parish has reached the limit of its carrying capacity in terms of further expansion of second homes, holiday lets (including caravan accommodation) and visitor numbers/activities (see NDP Economy Report).
- 3.7.2 Whilst income currently being generated by these activities is important and must be protected, further growth is not only likely to damage the community but is also likely to lead to damage to the environment, both directly due to excessive visitor pressure on the Protected Sites and indirectly due to associated traffic growth and parking issues in the Sites as well as in Holme village.
- 3.7.3 The balance needs to be restored with a larger proportion of external costs being met and more of the income generated being returned for re-investment aimed at improving the Environmental Capital and the welfare of the local community.

### **3.8 Opportunities**

- 3.8.1 Many of the issues described above were raised by parishioners at the various stages of the Neighbourhood Plan Consultation, notably in response to the free text questions in the Questionnaire Survey and in response to a poster at the January 2017 exhibition inviting people to identify the Strengths, Weaknesses, Opportunities and Threats in the Parish (see Consultation Area on website)
- 3.8.2 In addition there were many ideas and suggestions for opportunities that could be promoted. These are too numerous to list here (see Consultation Feedback posters on NDP website) but revolved around a number of common themes:
- Improving development control – including re-instating a boundary to prevent the spread of development and provide greater certainty for the future
  - Building a stronger community by introducing controls on the size and occupancy of new homes and replacement dwellings
  - Investigating sites for new homes including land owned by the Parish
  - Building new car parking facilities, traffic calming schemes
  - Exploiting the environment – through the AONB setting, green corridors for their amenity and wildlife value, improvements to The Hun and ecosystem services, Dark Skies initiative

- Protecting and exploiting views – particularly those linked to heritage and landscape features, especially views of Grade 1 Listed St Mary’s Church, across the marshes and from the footpaths across the southern slopes / Green Bank towards the sea and the village
- Improving and extending the footpath network - especially to provide access to Thornham / Drove Orchards and The Peddars Way / National Trail towards Old Hunstanton
- Improving and promoting new community facilities - Park Piece, a new village hall, a village shop

### **3.9 Pointers to the way ahead**

- 3.9.1 If the Parish is to have a sustainable future, it is clear that the issues discussed above will, where possible, need to be addressed through the Neighbourhood Plan. Some of these will require a long term view of where we want to be in the future – looking beyond the horizon of the current Neighbourhood Plan.
- 3.9.2 On the other side of the coin the opportunities need to be grasped now and in doing this it should be possible to address, or at least start to address some of the more serious issues. This has been a key consideration in drafting the Vision, Objectives and policies set out in Part B of the Plan.