

From: Cllr. Victoria Holliday
Sent: 04 January 2024 07:13
To: Annette Feeney
Subject: Relrepresentation for hearing

Dear Annette
Here is my third written representation.
Thank you v much indeed.
Vbw

Inspectors Matters 3.1 and 3.8

3.1 Second homes - should the prevalence of second and holiday homes have any bearing on the quantity of housing that shd be provided and if so, how? Would occupancy restrictions be justified on new market housing in some areas and in some circumstances?

North Norfolk has second highest number of second and holiday homes in the country at 12.5% (2022 data). However, in some villages this rises to over 50% - MORSTON is the highest at 52%, Salthouse the next at 50%, then Blakeney and CLEY at 44%.

Some areas with high numbers of second and holiday homes have high house prices making them unaffordable for locals. An example is Coastal Ward, where the percentage of holiday and second homes is 41% and the median house price is £495,000 (2022 data).

Some areas of high second and holiday homes have low numbers of affordable houses eg MORSTON where 52% are second homes and holiday lets and 19% homes are affordable (2022 data).

High second and holiday home ownership is widely perceived by communities to have a negative impact on housing affordability for locals.

This is supported by recent Neighbourhood Plans, such as in Blakeney, which was passed at referendum in September 2023 with 90% in favour, and made in October 2023. In the Blakeney Neighbourhood Plan, 78% of the community supported limiting the number of second homes and a policy for restricting sales of new homes for principal residency was adopted (Policy 2). 78% of the community also supported limiting the number of holiday lets and a policy on restrictions on change of use from residential to holiday lets was also adopted (Policy 3). The NP plan also supports the change of use from holiday lets to residential (Policy 4), and limits the ability to extend holiday lets (Policy 5).

High second and holiday home ownership is widely perceived by communities to cause withdrawal of services.

The lack of permanent residents does have an impact on wider service provision such as transport, healthcare and education. Because of poor bus services, a round trip to the GP surgery in Coastal Ward is between 4 and 5 1/2 hrs. It's also a 3 1/2 hr round trip to college in Norwich. Primary school rolls are low.

This data shows the prevalence of second and holiday homes should justify occupancy restrictions on new market housing in those areas most affected. Otherwise, new development is likely to increase the number of second and holiday homes.

3.8 Are there national policies that protect areas or assets of particular importance in the district that provides strong reasons for reducing the overall provision of housing below the housing need?

For the avoidance of doubt, I am here making reference to the new Planning Policy Framework of December 2023. However, I will continue to refer to the Norfolk Coast Area of Outstanding Natural Beauty rather than the new term of Norfolk Coast National Landscape as the former is the term used by the new Framework.

The new National Planning Policy Framework paragraphs 180-184 refer to the need to protect Areas of Outstanding Natural Beauty and the Heritage Coast. The Norfolk Coast Norfolk Area of Outstanding Natural Beauty (AONB) stretches from Snettisham in West Norfolk to Paston in North Norfolk. The Heritage Coast stretches from Holme on Sea in West Norfolk to Weybourne in North Norfolk.

The main thrust of the new NPPF paragraphs 180-184 is to:

- Conserve, protect and enhance valued landscapes, scenic beauty, wildlife and cultural heritage;
- Limit scale and extent of development in these designated areas;
- Refuse major development other than in exceptional circumstances and where it can be demonstrated to be in the public interest;
- Recognise the intrinsic beauty of the countryside and the wider benefits from natural capital and ecosystem;
- Maintain the natural beauty of the undeveloped and Heritage Coast; and
- Minimise impacts on and provide net gains for biodiversity.

Conserving, protecting and enhancing the Norfolk AONB is essential. In the Norfolk Coast AONB Management Plan (updated 2022) of the seven KeyQualities of Natural Beauty, as assessed in 2022, 5 are rated as amber (some grounds for concern) and only 2 as green (the key quality is being conserved and enhanced).

The Key Qualities rated as amber are:

- The dynamic character and geomorphology of the coast;
- Strong and distinctive links between land and sea;

ty and integrity of landscape sea scape and settlement character;

- Exceptionally important, varied and distinctive biodiversity; and
- Sense of remoteness, tranquillity and wildness.

It could be argued that 4 out of these 5 Key Qualities are within developmental control; the dynamic character and geomorphology of the coast being more affected by climate change than development.

The Key Qualities rated as green are

- Nationally and internationally important geology; and
- Richness of archaeological heritage and historic environment.

It could be argued that these are less affected by development.

Two of the Key Qualities have dropped from green to amber during the period 2014-22

- The dynamic character and geomorphology of the coast; and
- Exceptionally important, varied and distinctive biodiversity, based on locally distinctive habitats.

Of these two, biodiversity is within developmental control.

The explanation for the down rating of Key Qualities of Natural Beauty is given as: 'Significant developments have adversely affected character of the coast, particularly in Cromer- Sheringham- Holt triangle. Boundary settlements where expansion has occurred include Holt, Sheringham and Cromer. These have impact on the setting of AONB as well as increasing recreational pressure. Insensitive changes to building and settlement character from building alterations/ extensions and security lighting are a concern.

Some of the most high profile, characteristic bird species are affected by pressure from coastal visitors. Turtle dove populations are decreased.

The population in and close to the AONB has risen significantly. Visitor numbers have increased significantly since designation and have remained high.

Archaeological damage has occurred from ploughing and there has been some loss of historic landscape patterns such as field boundaries. Coastal and offshore development has affected the setting of some coastal heritage assets.'

This above analysis demonstrates the strong reasons under national policies for reducing the level of development in the Norfolk Coast AONB and Heritage Coast.

Victoria Holliday