



## **North Norfolk Local Plan**

---

### **HEARING STATEMENT**

**Matter 8 – Employment Policies & Allocations – Policy E6  
New Tourist Accommodation, Static Caravans & Holiday  
Lodges, & Extensions to Existing Sites**

**Prepared by: John Long Planning Ltd for  
The Blakeney Hotel**

**2 January 2023**

---

## Table of Contents

1	INTRODUCTION .....	1
2	BLAKENEY HOTEL RESPONSE TO INSPECTOR'S ISSUES .....	2
	<b>Matter 8: Employment Policies &amp; Allocations – Policy E6 New Tourist Accommodation, Static Caravans &amp; Holiday Lodges, &amp; Extensions to Existing Sites - Is Policy E6 too restrictive, unnecessarily constraining sustainable rural tourism?.....</b>	<b>2</b>
3	SUGGESTED CHANGE.....	2

---

## 1 Introduction

- 1.1 This hearing Statement has been prepared by John Long Planning Ltd, on behalf of the Blakeney Hotel. It relates to representations submitted on behalf of the Estate to the NNDC Local Plan (pre-submission version). The Statement provides information and responses to the Inspector's Matters, Issues and Questions For examination published in November 2023. The Blakeney Hotel is an iconic building in Blakeney and one of the district's major employers.
-

## 2 Blakeney Hotel Response to Inspector's Issues

### **Matter 8: Employment Policies & Allocations – Policy E6 New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites - Is Policy E6 too restrictive, unnecessarily constraining sustainable rural tourism?**

- 2.1 The Plan, Policy E6 part 2, requires that hotel development complies with the sequential approach in accordance with Policy E4 and the NPPF. It is not clear whether this policy requirement applies to all types of hotel development, including extensions to existing hotels; as well as part 3 of the policy.
- 2.2 Policy E6 part 3, provides for business expansions and extensions to existing tourist accommodation, static caravans and holiday lodges subject to conditions (hotels are not specifically mentioned). However, it is not clear whether part 3 of Policy E6 overrules/supersedes part 2 in considering proposals for existing hotel expansion; or if both elements of the policy will apply to the consideration of hotel expansion proposals.
- 2.3 Blakeney Hotel is concerned that if Policy E6 part 2 applies, any expansion proposal at the Hotel for additional guest bedrooms would have to comply with Policy ECN 4 Retail and Town Centres and require the sequential test to be met and demonstrate that there are no available sites in nearby main town centres or edge of town centres. This is too restrictive for Blakeney Hotel. It is not practicable or viable for the Hotel to operate 'satellite' bedrooms away from the main hotel.
- 2.4 Blakeney Hotel consider that the Plan (Policy E6) is not sound and is defective because it is not justified and overly restrictive and disadvantages rural tourism.
- 2.5 Blakeney Hotel considers that the Plan (Policy E6) can be made sound by a simple clarification to confirm that that Part 2 of the policy i.e., the application of the sequential test is for proposal for new hotels only; and that the expansion of existing hotel businesses to provide additional tourism accommodation is exempt from the application of the sequential test. This will mean existing hotel businesses in villages and rural areas are better able to grow and expand to meet business and visitor needs.

## 3 Suggested Change

- 3.1 The suggested change is to amend policy E6 Part 2:  
"2. Where the development is for a **new** hotel, this should demonstrate compliance with the sequential approach in accordance with national retail policy and Policy E 4 'Retail & Town Centre Development.