

King's Lynn Comments & Responses

Title	Consultee	Organisation	Summary details	Modification	Proposed Actions
King's Lynn & Surrounding Area	Mrs A Isted				Note comment.
LP34 - King's Lynn Policy	STP Estates Group (inc. West Norfolk NHS Clinical Commissioning Group, Queen Elizabeth Hospital King's Lynn NHS Foundation Trust, Norfolk Community Health and Care NHS Trust, Norfolk and Suffolk NHS Foundation Trust)		The STP estates group welcomes statement 16. reference working with strategic partners to ensure the continued presence of a general hospital at King's Lynn. It is important that any developer contributions/CIL that is made available due to the growth in the area is also used to address capacity issues at the		Note comment.

			Queen Elizabeth Hospital King's Lynn and isn't solely focussed on primary care activity. Key worker housing close to the hospital would help to support recruitment and retention of staff.		
LP34 - King's Lynn Policy	Mrs Pam Shepphard	Parish Clerk Castle Rising Parish Council	Commitments for Kings Lynn in LP34 should be supported by clear infrastructure delivery plan that is tied to securing funding and delivering infrastructure before development is occupied. This policy does not reflect the constraints on development - wording 'at least'.	Allocations already permitted should be removed and reflected in the permissions/commitments. Knights Hill deleted and corresponding 600 dwellings removed from the provision of dwellings. Wording 'at least' amended to 'up to' or 'around'.	Allocations already permitted should be retained in the plan. This is a long-term plan and permissions can lapse before development commences. Knights Hill is proposed for deletion and the numbers are adjusted accordingly. 'At least' wording provides flexibility and should be retained.

LP34 - King's Lynn Policy	Infrastructure Development Community	Norfolk County Council (Infrastructure Dev, Community and Env Services)		9.1 LP34 – King’s Lynn Policy LP34 8. The wording could be amended as follows; Within the historic and commercial cores of the town, new development will be required to demonstrate a high quality of design which, without stifling innovation, respects and enhances the wider historic surroundings (including archaeological interest) and reinforces a positive visitor experience to the town and consequently supports the local tourism, leisure and cultural economies.	Agree - include the wording '(including archaeological interest)'.
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LP34 - King's Lynn Policy	Lord Howard	Castle Rising Estate	Commitments for Kings Lynn in LP34 should be supported by clear infrastructure delivery plan that is tied to securing funding and delivering infrastructure before development is occupied. This policy does not reflect the constraints on development - wording 'at least'.	Allocations already permitted should be removed and reflected in the permissions/commitments. Knights Hill deleted and corresponding 600 dwellings removed from the provision of dwellings. Wording 'at least' amended to 'up to' or 'around'.	Allocations already permitted should be retained in the plan. This is a long-term plan and permissions can lapse before development commences. Knights Hill is proposed for deletion and the numbers are adjusted accordingly. 'At least' wording provides flexibility and should be retained.
LP34 - King's Lynn Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Object - We note that you plan to carry forward the existing allocations including West Winch etc. Historic England has some concern at the over-reliance on these and other greenfield sites. Such sites are easy greenfield sites and the danger is that this will stifle urban regeneration and the unlocking of the brownfield sites which the HAZ project is seeking to deliver. How do you aim to ensure that the brownfield regeneration sites come	Specifically allocate some sites from the HAZ Feasibility Study – Unlocking Brownfield Potential. Criterion 6 - change protecting for conserving. Add specific reference to local character – describe local building materials/vernacular etc. perhaps in paragraph 9.2.5	Disagree - no need to allocate sites from the HAZ as they can come forward for development in any case. Agree to change protecting to conserving in criterion 6. Agree to adding specific reference to local character in 9.2.5.

			<p>forward? The recent Feasibility Study undertaken as part of the HAZ work looked at the potential of a number of sites in Kings Lynn to be brought forward for (re) development. Whilst we appreciate that not all of these sites will necessarily be taken forward, we would strongly suggest the inclusion of any of the sites that are to be pursued to be included as allocations within the new local plan. It is important that the Plan clearly shows the development strategy and future sites for development to the wider public. The Plan should also indicate how these sites could be developed (based on the findings of the feasibility study). Allocation within the plan could help to bring forward these sites and provide greater certainty.</p>		
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			<p>Once it has been decided which of these sites could come forward, the sites should be incorporated into the Local Plan. Ideally reference could be made to these sites in this policy. We welcome criterion 6 although suggest changing protecting to conserving in line with the NPPF wording. We welcome criterion 8 although can we be more specific about local building materials etc.? Perhaps this could be included in paragraph 9.2.5</p>		
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LP34 - King's Lynn Policy	Mrs Pam Shepphard	Parish Clerk Castle Rising Parish Council	<p>The policy sets out a commitment to the provision of 4,950 new dwellings in the Kings Lynn area. It relies on the existing allocations carried forward from the SADMP as part of this. However, a number of sites in the SADMP have been permitted already and therefore, should be removed from the allocations and reflected as permissions/commitments. In addition, the allocation at Knights Hill should also be deleted and the corresponding 600 dwellings removed from this total (see below 9.6) such that it is no more than 4,350. The commitments made for Kings Lynn in LP34 should also be supported by a clear infrastructure delivery plan that is tied to securing funding and delivering infrastructure before development is</p>		<p>Allocations already permitted should be retained in the plan. This is a long-term plan and permissions can lapse before development commences. Knights Hill is proposed for deletion and the numbers are adjusted accordingly. 'At least' wording provides flexibility and should be retained.</p>
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			<p>occupied. In the absence of this, the scale of growth envisaged is likely to place an unacceptable strain on road transport and other public infrastructure. The way this policy is written also sets a requirement that does not reflect the constraints on development. By the inclusion of the term "at least" on numerous occasions throughout the policy, the policy prejudices the balanced assessment of proposals and potentially overrides legitimate planning constraints to growth in any given situation. It is not, as the Council suggest, an expression of a positively prepared plan, that is a function of the overall approach to the level of provision and wording of policies. It does not require individual allocations to be worded in this way. It</p>		
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			<p>arose from the last SADMP examination and the implications of this late change was not fully understood or debated at that time. Currently, the opening statement of this paragraph reads 'The strategy for growth is to: Provide at least 4,950 new dwellings within and around King's Lynn including:..' This could mean 4,951 new dwellings, or significantly more, as it is so ambiguous. If the housing requirement numbers have been calculated accurately and sympathetically commensurate with local constraints and requirements, then there is no need to build more than the stated numbers other than in circumstances where windfall sites come forward in acceptable locations. Consequently, the term "at least" should</p>		
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			<p>be replaced throughout this paragraph (and the Local Plan) by the term “up to” or “around”. The opening paragraph (and other instances in the text) would therefore read “The strategy for growth is to: Provide up to 4,350 new dwellings within and around King’s Lynn including:...”.</p>		
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LP34 - King's Lynn Policy	Mrs Helen Russell-Johnson	Planning Secretary Kings Lynn Civic Society	<p>King's Lynn: The allocations appear to be the same or similar to the SADMP document. Our concerns remain as we articulated in 2015 for the SADMP consultation. Whilst there are very general statements about providing suitable transport access and green infrastructure – there are no specifics. The fact is that there has been a net loss of open space in the town because of the existing housing allocations. There are still no new significant green spaces proposed – even as an aspirational goal. Equally – there are no clear proposals for transport access improvements, multi-storey parking, park-and-ride, cycleway provision – or any other approach which could lessen congestion and pollution in the town. The Civic Society remain</p>		<p>Allocations already permitted should be retained in the plan. This is a long-term plan and permissions can lapse before development commences. A Norfolk GI & RAMS Strategy and a King's Lynn Transport Strategy have been prepared since the close of consultation.</p>
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			opposed to opening Harding's Way to general traffic – or any plans that would diminish any of the existing infrastructure that presently provides for public transport, cycling or walking routes in the town.		
King's Lynn		STP Estates Group (inc. West Norfolk NHS Clinical Commissioning Group, Queen Elizabeth Hospital King's Lynn NHS Foundation Trust, Norfolk Community Health and Care NHS Trust, Norfolk and Suffolk NHS Foundation	The STP estates group welcomes the majority of the housing growth in the local plan being in King's Lynn as this helps to concentrate patient numbers in an area that allows health to respond at scale. However the impact on health services in King's Lynn should be noted, particularly on primary care and it is important that health can access mitigation through developer contributions/CIL for additional infrastructure required as a direct result of the additional growth. Throughout the policy		Noted. Add reference to the health protocol to supporting text.

		Trust)	<p>areas for growth reference is made to 'financial contribution towards the provision of infrastructure including additional primary and secondary school places'. The STP estates group would like to see health and social care facilities explicitly included in this statement.</p>		
King's Lynn	Mr Ben Colson		<p>Site specific policies E1.4 to E1.15 all relate to housing allocations in the PE30 postcode area. Some are for small scale developments or those in the town centre core area, and excluding those, all have a planning criteria for the provision of infrastructure, specifically highlighting the provision of new primary and secondary school places (note, this is not the same as primary and secondary schools). Not</p>		<p>The King's Lynn Transport Strategy has been approved since this comment was made and will address many of the issues raised.</p>

			<p>one requires any consideration to be given to traffic or transportation issues as a matter of policy. The Borough's view must, therefore, be that nothing requires to be done unless the TA shows a need, but then the developer can fall back on the contradictions in the LPR, and as the Borough provides no criteria for the county to use, it has to use the only criteria available, namely whether there will be a severe impact on road traffic accidents. Thus the proposal is that about one thousand new homes should be built in PE30 (excluding West Winch and the failed Knights Hill development proposal) without any coherent policy to take traffic mitigation measures whatsoever.</p>		
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King's Lynn	James Grant	BCKLWN	We are aiming for the following: Wagg Jex – 34 Cork Bros – 17 Land S/E of Harding's Way - 22 Land at Parkway – 155		Noted.
King's Lynn	Mrs Elizabeth Mugova	Planning Advisor Environment Agency	The order that details of policies are included makes the plan somewhat difficult to read. For example, for the King's Lynn policies, the first map shows locations of allocations E1.4, 1.6, 1.7 and 1.9. From here, a detailed description of E1.4 is included, followed by E1.5 before the location of E1.5 is shown on a map (this is provided later in the document). Although this makes sense in line with the numbering (i.e. 1.4, 1.5, 1.6 etc.)	It would be easier to have details of all allocations in one location and then move on to the next set of allocations in another location. Alternatively, a more detailed site plan could be provided with each allocation policy description.	All of the King's Lynn allocations are shown on Inset E1 page 152. use of the interactive version of the plan is encouraged.

King's Lynn	Tim Tilbrook	Cllr Valley Hill Ward	<p>King's Lynn The report quite rightly highlights the importance of King's Lynn in the strategic policy. It has to be acknowledged that the policy has failed thus far to achieve its aims. The report admits 'some areas of King's Lynn town centre appear uncared for and unsafe.' We know footfall is falling. Average earnings are lower than the national and regional averages, we have low skilled employment sectors, we have made mistakes in the past with allowing so many out of town retail centres. There are many sites left abandoned for decades. The situation is unlikely to get better without a better thought out plan. We have seen with the potential development site at South Wootton how unpopular these types of developments</p>	<p>If we can crack King's Lynn we will have done a good thing. 1. We need to be serious about building in the centre. We should develop our own land and build slightly higher to get a greater density in the centre. 2. Sites that have been just abandoned such as the post office and Anglian Cannors should have political and moral pressure put upon them to build out or sell. We have the power to compulsory purchase if necessary. In this crowded world it cannot be right that a town and its tens of thousands of residents have to put up with derelict sites for years on end. 3. The town centre needs to become the centre. A new bridge should be sought in the long term and West Lynn properly linked to the town. West Lynn could be used to</p>	<p>Noted. 1. The Council is building on its own land – the HAZ scheme is taking a number of central sites forward. 2. Abandoned sites are targeted by the Council. Anglia Cannors is perhaps a reference to the former Tank Farm site on Estuary Road which has planning consent for residential development. 3. A new bridge was one of the long list options considered in the King's Lynn Transport Study work, but dismissed at that stage.</p>
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			<p>are. For everyone who writes or demonstrates 10 think it but don't do anything. King's Lynn town centre is crying out for development. All of us could real off site after site that could be developed but has not been. To just allow the building of easy sites such as South Wootton is short sighted and not in the long term interest of King's Lynn. There other problems facing King's Lynn as it is likely, even with the best will in the world, that the shopping demand in the town centre will continue to decline. After six pm most evenings the town centre is empty. Compare this with similar towns in England and across Europe where there is a nightlife, crowded streets and a vibrant economy. The solution is simple, but hard to achieve, the</p>	<p>allow for future growth. 4. A new bridge might be linked into using the tidal flow of the river to generate green and reliable energy. This could be linked with better use of the river as a leisure area for our people.</p>	
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			<p>numbers of homes in the centre needs to increase dramatically. We know developers cannot see sufficient returns on their land to undertake this, so we as a borough must. Many sites we own ourselves and we should build out as soon as we can. Those sites we do not own and which have just been left abandoned we need political pressure put on them. We could buy some shares in these companies and attend shareholder meetings putting pressure on the board. We could have photographs of the sites and draw public awareness through the media again putting pressure on the boards. Doing nothing and allowing many sites to continue to lie derelict cannot be a policy. Developing the town</p>		
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			<p>centre would also help so many of the borough's other aims: reducing greenhouse gases, sustainable development, protecting the countryside, provision of services to name a few, while also being very popular. Sites such as South Wootton would not have to be pushed. A longer term aim should be to look to the river and West Lynn for future development and growth. There can be few other towns where a lovely river plays such a small part in the life of the town. Indeed many visitors having been to King's Lynn barely know the town has a river let alone the third biggest in the U.K. The green energy potential of the river is huge. There is a massive tidal flow, one of the biggest in the world, but no research or</p>		
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			<p>thought of it being harnessed is ever suggested. At the very least this should be looked into and a small scale viability project should be investigated. One just needs to see the money created by the offshore wind farms to see what economic growth might be achievable as well as possibly bringing the river into more use and creating a link to West Lynn and making King's Lynn centre more accessible. This would be a real vision producing green energy, creating skilled jobs, rebalancing the centre of the town, providing an area for future housing growth. Brownfield development 4.1.25 It is hard to find any private developers building on brownfield sites. Again we have fine words about using</p>		
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			<p>brownfield sites but as above, they are not profitable enough to private developers to develop. It is the point made in the previous section. Either they build out or we as a council should build brownfield sites needing developing. The current record profits made by developers gives them no incentive to build less profitable sites. The report believes that developers have a key role to play to help the borough achieve its housing (LP05 4.5.5) and other aims, this is highly unlikely. Also believing that developers have the interest of the borough in mind is misplaced. They have a duty to maximise their profits and we have a duty to make sure that our legacy of a most beautiful region is not destroyed. Leaving protection of the countryside until it is too</p>		
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			late will be unforgivable.		
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King's Lynn	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Object - We welcome reference to King's Lynn's distinctive identity but more could be said here regarding building materials, styles character etc.	more could be said here regarding building materials, styles character etc.	Agree to adding specific reference to local character in 9.2.5.
King's Lynn	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Object - We welcome the reference to the Heritage Action Zone here but consider that more could be said about what has been done.	Add more regarding the HAZ	Agree – add more text about the King's Lynn HAZ at 9.2.19.

King's Lynn	Centrica Plc	Centrica Plc	<p>The Local Plan Review does not recognise King's Lynn Power Station. Centrica considers this to be an omission and that the Local Plan Review should safeguard King's Lynn Power Station as a strategic asset. King's Lynn Power Station is a combined cycle natural gas power station and following recent investment, for the installation of a new gas turbine the Power Station is capable of producing enough power to meet the needs of 370,000 households. Adjacent to Centrica, EP UK Power Development Ltd have secured consent for Kings Lynn 'B', with construction expected to commence in 2019, and for the Power Station to be operational by 2022. Centrica is concerned to ensure that any development that takes</p>	<p>We request there is a site specific policy for King's Lynn Power Station under section 9.2 and a corresponding designation on the Local Plan proposals map. We suggest the following wording for a new site specific policy: Policy 9.2.15 E1.14 - King's Lynn Power Station The role of King's Lynn Power Station will be protected and strengthened through: a) recognising and protecting King's Lynn Power Station as identified on the proposals map b) supporting development of the Power Station where this is compatible with other policies in the development plan; and c) having regard to compatibility with the existing King's Lynn Power Station when determining proposals for development in the</p>	<p>Disagree that this is necessary – these matters can be dealt with by normal development management procedures.</p>
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			<p>place in the area does not add further power generation until current constraints on the local grid are addressed. It is also important that any new development does not generate dust/debris in proximity to Kings Lynn Power Station's filter system, as that would result in significant additional operational management burdens on Centrica, and that any development ensures it has adequate water and foul/surface water drainage systems that will not impact on those for the Power Station. Centrica has occasional operational requirements for very large loads (circa 98m long and 5m wide) to access King's Lynn Power Station, which means there is a need to retain direct and straight access from the A47 direct to the Power Station that is kept clear</p>	<p>vicinity of the Power Station, or which may affect the infrastructure which supports them.</p>	
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			<p>of roundabouts. Given the above, Centrica requests that the Local Plan Review should include a site specific policy to protect energy and infrastructure, and identify King's Lynn Power Station on the proposals map. The site is significant infrastructure, which not only requires policy protection to ensure that new development proposals will not adversely affect existing operations but also supportive policies to assist and drive growth. This is consistent with the approach taken by the Council for King's Lynn Port at Policy E1.2A which, provides protection for the operations of the port and supports its development and growth. Paragraphs 16 and 17 of the National Planning Policy</p>		
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			<p>Framework (2019) state that Plans should effectively engage between plan-makers and infrastructure providers and include strategic policies to address priorities for development and use of land in the area. Our request is further supported by Paragraphs 80 and 81 which state that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.</p>		
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<p>E1.1 King's Lynn - Town Centre Policy</p>	<p>Mr Ben Colson</p>	<p>The consequence: Planning impacts on local economies Congestion adds time and fuel cost to the road user, and for commercial business this is especially significant. It has been calculated that in 2017 congestion cost each motorist £1.2k and nationally it had a negative impact of £37.7bn on the economy. The LPR provides an ideal opportunity to make policies to reduce this impact in the King's Lynn area, bringing the prospect of lower costs associated with the town's retail and tourism sectors. Further, whereas earlier versions of NPPF required that TAs are site specific, meaning that the consequential effect cannot be taken account where there is a number of separate sites being developed, the most</p>		<p>The King's Lynn Transport Strategy has been approved since this comment was made and will address many of the issues raised.</p>
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			<p>recent version does now allow this. The Borough recognises the negative impact of 'site splitting' in the LPR in respect of rural areas but not the equivalent in PE30. This is inconsistent and maximises the negative impact on the town's economy but its policies can mean otherwise if it so chooses. The LPR repeated refers to the rural nature of the Borough requiring car-based transport arrangements, and to the extent of most rural areas, this is correct. However, there is no case for it to apply in PE30, and the one-size-fits-all policies in this respect undermine the town's economy. Para 5.7.3 states "many people rely on the car as the main mode of transport." The Town Centre policy E1 states in respect of public</p>		
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			<p>transport, at 1(d) that it will encourage (that's all) improved access to the town centre "especially in terms of public transport, walking and cycling, and to parking provision and management." In other words, it will treat all modes equally, without reference to the national or county transport hierarchy. LPR section 5, Economy & Transport, paras 5.1.2 to 5.1.6 (Tourism) and 5.1.7 (Retail) make no mention of public transport improvement or sustainability, and whilst Policy LP06 (Economy) states that the local economy will be developed sustainably, specific policies within LP06 regards tourism, leisure and town centre uses do not refer to transport or sustainability. Policy LP07 (Retail and Development) makes no</p>		
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			<p>mention of transport modal choice. It may be said that people need cars to shop, no matter where they live. Actually, research has shown that because people who shop by bus make more trips to the central retail area, over time they actually spend more in central area retail than do car users. The LPR could reflect this but chooses to point policy in the opposite direction.</p>		
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E1.1 King's Lynn - Town Centre Policy	Mrs Elizabeth Mugova	Planning Advisor Environment Agency	There is no reference to requirements for a FRA despite the fact that a number of these sites are at risk of flooding.	Where it is stated that particular development types are encouraged, include caveat that these must be in line with Policy LP22.	Agree include reference to Policy LP22 Sites in Areas of Flood Risk in Policy E1.1 King's Lynn Town Centre.
E1.1 King's Lynn - Town Centre Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Comment - We welcome reference to historic character, local distinctiveness etc. in criterion 1. Paragraph f on shop frontages is broadly welcomed too. The provision of "larger, modern format retail units" (paragraph e) will need to be carefully located and designed to avoid harm to heritage assets. This applies as much to the Town Centre Retail Expansion Area (Policy E1.2) as it does elsewhere in the town centre.		Noted.
E1.2 King's Lynn - Town Centre Retail Expansion Area Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Comment - The provision of "larger, modern format retail units" (paragraph e) will need to be carefully located and designed to avoid harm to heritage assets.		Noted.

E1.3 King's Lynn - Gaywood Clock Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Object - This area includes a number of grade II listed buildings and the grade II* Church of St Faith. Reference should be made to these listed buildings at least in the supporting text and ideally the policy too.	Reference should be made to the listed buildings at least in the supporting text and ideally the policy too.	Agree include reference to the listed buildings in the supporting text to Policy E1.3 para. 9.2.4.1.
E1.4 King's Lynn - Marsh Lane Policy	Infrastructure Development Communit	Norfolk County Council (Infrastructure Dev, Community and Env Services)		The allocation Policy E1.4 contains a requirement at point 1.d. for a 'Mineral Assessment'. A mineral assessment was submitted to the Mineral Planning Authority as part of the 16/02231/OM application. The intrusive site investigations that took place across the site were able to prove to the satisfaction of the Mineral Planning Authority that viable mineral did not occur on site, and that 'needless sterilisation' would not occur. It may be useful for the Borough Council to include this within the supporting text for the	Noted but these requirements are not included in the policy. No action required.

				allocation to amend part of paragraph 9.6.1.12 and remove point 1. d.	
E1.4 King's Lynn - Marsh Lane Policy	Mrs Elizabeth Mugova	Planning Advisor Environment Agency	We welcome reference to submission of a site specific FRA. However, there is inconsistency throughout the plan regarding the amount of detail in wording specifying a requirement for an FRA	FRA requirements must be in line with Policy LP22.	Noted.
E1.4 King's Lynn - Marsh Lane Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	No Comment		Noted.
E1.5 King's Lynn - Boal Quay Policy	Mrs Elizabeth Mugova	Planning Advisor Environment Agency	The location of the site means that a bespoke flood defence breach analysis will be required to demonstrate the residual flood risk to the	Include wording: 'The FRA must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should	Agree - Include wording: 'This must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should

			site. Consideration should be given to potential opportunities to improve the condition and standard of protection of flood defences bordering the site in line with relevant climate change flood levels.	include details of the impact and likelihood of a breach occurring.'	include details of the impact and likelihood of a breach occurring.' in Policy E1.5 2.
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E1.5 King's Lynn - Boal Quay Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Object - The King's Lynn Conservation Area lies immediately to the east and north of this site. The Conservation Area includes a large number of listed buildings near to this site, many of which are listed at grade II but also including the Church of All Saints which is listed at Grade II*. Whitefriars Gateway scheduled monument lies on the eastern boundary of the site. Any development of the site therefore has the potential to impact upon the setting of these heritage assets. The broad principle of redevelopment of this site is acceptable and a Masterplan exists for site. Whilst the draft policy refers to the need for archaeological assessment, it should also refer to the need to conserve and enhance the significance and	Add reference to the need to conserve and enhance the significance and setting of nearby heritage assets, specifically listed buildings and the conservation area.	Agree - Add reference to the need to conserve and enhance the significance and setting of nearby heritage assets, specifically listed buildings and the conservation area to the Policy with appropriate supporting text.
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			<p>setting of nearby heritage assets, specifically listed buildings and the conservation area (similar wording is used for other site policies). There is no reference to the Waterfront Regeneration Area masterplan either, so it is not clear whether this document remains valid and whether the site can accommodate 350 dwellings (and potentially other uses). As currently drafted, the plan is unsound in terms of its effectiveness, deliverability and consistency with national policy. The Planning Practice Guidance states "where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing</p>		
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			<p>the ‘what, where, when and how’ questions” (PPG Reference ID: 12-010-20140306 (last revised 06/03/2014). Paragraph 16d of the NPPF also states that only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Protecting and enhancing the historic environment is a strand of the environmental objective of the planning system (Paragraph 8c) and Local Plans should set out a positive strategy in this respect (Paragraph 185).</p>		
E1.6 King's Lynn - South of Parkway Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	No Comment		Noted.

E1.7 King's Lynn - Land at Lynnsport Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	No Comment		Noted.
E1.8 King's Lynn - South Quay Policy	Mrs Elizabeth Mugova	Planning Advisor Environment Agency	The location of the site means that a bespoke flood defence breach analysis will be required to demonstrate the residual flood risk to the site. Consideration should be given to potential opportunities to improve the condition and standard of protection of flood defences bordering the site in line with relevant climate change flood levels.	Include wording: 'The FRA must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.'	Agree - Include wording: 'This must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.' at point 7 of the Policy.
E1.8 King's Lynn - South Quay Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Support - As with Boal Quay, this is a sensitive site within the historic core of King's Lynn, located within the conservation area and contains/adjoins listed buildings. We welcome the reference to retaining		Support noted.

			the listed Sommerfeld and Thomas Warehouse, submitting an archaeological assessment, retaining Devil's Alley as a public right of way and the sympathetic design approach to address the conservation area and nearby listed buildings.		
E1.9 King's Lynn - Land west of Columbia Way Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	No Comment		Noted.
E1.10 King's Lynn - North of Wisbech Road Policy	Mrs Elizabeth Mugova	Planning Advisor Environment Agency	The location of the site means that a bespoke flood defence breach analysis will be required to demonstrate the residual flood risk to the site.	Include wording: 'The FRA must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.'	Agree - Include wording at E1.10 point 1: 'This must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.'

E1.10 King's Lynn - North of Wisbech Road Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Object - Whilst there are no designated heritage assets on the site, the Kings Lynn Conservation Area lies to the north of the site. Any development of the site therefore has the potential to impact on the setting of the Conservation Area. Therefore the policy should include reference to the need for development to preserve or where opportunities arise enhance the Kings Lynn Conservation Area and its setting'	Add criterion re conservation area 'Development should preserve or where opportunities arise enhance the Kings Lynn Conservation Area and its setting'	Agree - Add criterion re conservation area 'Development should preserve or where opportunities arise enhance the Kings Lynn Conservation Area and its setting'
E1.11 King's Lynn - Southgates Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Object - Whilst there are no designated heritage assets on the site, the Kings Lynn Conservation Area lies to the north. South Gate, a scheduled monument and listed at Grade I. Any development of the site therefore has the potential to impact on the setting of these heritage assets. Therefore the	Add criterion re heritage assets. 'Development should conserve and where appropriate enhance heritage assets and their settings'	Agree - Add criterion re heritage assets. 'Development should conserve and where appropriate enhance heritage assets and their settings'

			policy should include reference to the need for development to conserve and where appropriate enhance heritage assets and their settings		
E1.12 King's Lynn - Employment Land Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	No Comment		Noted.
E1.13 King's Lynn - Green Infrastructure Policy		STP Estates Group (inc. West Norfolk NHS Clinical Commissioning Group, Queen Elizabeth Hospital King's Lynn NHS Foundation Trust, Norfolk Community Health and Care NHS Trust, Norfolk and Suffolk NHS	The STP Estates group aims to ensure that elements that contribute to health and wellbeing, such as leisure facilities and green space, are not overlooked. This policy is welcomed as access to green space has recently been highlighted in the publication of the UK Government's 'A green future: our 25 year plan to improve the environment'. This was published in January 2018 and includes detail in Chapter 3 on helping people to improve their		Support noted.

		Foundation Trust)	health and wellbeing by using green spaces. This includes considering the impact this has on mental health and how associated services can improve mental health. It is therefore imperative that access to green space is maintained and managed in a consistent manner.		
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West Lynn	Mr David Goddard		<p>My client is generally supportive of the development strategy for West Lynn – acknowledging that in function it forms part of King’s Lynn and as such is the most accessible and sustainable location for new housing in the Borough, and including West Lynn as part of the King’s Lynn housing area. King’s Lynn contains most of the higher order services and facilities for the borough and its centre is very close to the old port area - immediately opposite West Lynn. It is noted that residential development on the waterside in King’s Lynn has been recently allocated (Boal Quay E1.5 and E1.10) notwithstanding much of the old town centre being within the FZ3 which is the same risk designation as the</p>	<p>Amend development boundary for West Lynn to include all or part of the site identified in the HELAA as H481 land at 54 Clenchwarton Road West Lynn as housing allocation for affordable and starter home properties.</p>	<p>Disagree – further site allocations are not needed.</p>
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			<p>HELAA site 481. It is my clients view that the application of flood risk as a constraint to allocation for new housing is not consistent, given that his site HELAA 481 has been excluded from the allocations document apparently entirely on FZ matters. The land is no longer in agricultural use and clearly form part of the village form rather than that of the agricultural landscape beyond. The HELAA acknowledges that the site is available and deliverable and in accordance it the search criteria set out in the HEELA- the only critical constraint identified is that of the flood risk. It is also evident that over the last few years that have been several permissions for new housing West Lynn within a similar flood risk area. The HELAA does</p>		
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			<p>not identify any significant constraints to development (other than flood risk) that cannot be mitigated, the site is well related to the Kings Lynn with the services and facilities therein. The matter of flood risk is considered to be inconsistent within the draft plan with the comments of the LLFA being used to eliminate some sites but not others. The landowner is mindful of the character of the surrounding development and the housing needs of the town and as such is prepared to reduce the number of homes to be allocated to a figure equating to the local housing need for affordable homes and these could come forward as affordable and starter homes to meet the identified need for these as set out in</p>		
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			<p>Local and National policy - It is noted that this level of development would not require all of the site and we are happy to discuss the sub division of the site with officers as appropriate to define the extent of the allocation or amendment to the development boundary. The weight to be given to the delivery of affordable homes and starter homes should be weighed against the managed flood risk identified by the LLFA and set out in the previous planning application. It is noted that in the previous application a mitigation strategy was put forward to address flood risk which was accepted by the IDB and Environment Agency as an appropriate design solution to the site. Given that there is an acceptable design</p>		
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			<p>solution to a housing site which is acknowledged to be in a sustainable and accessible location it is requested that the site be allocated for affordable and starter homes. The provision of affordable housing and starter homes would address the housing needs element of the exception test within the NPPF.</p>		
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E1.14 West Lynn - Land West of St Peter's Road Policy	Mrs Elizabeth Mugova	Planning Advisor Environment Agency	This site is shown to flood to depths of over 2 metres on the Environment Agency THM. Has any consideration been given to residual risk when applying the sequential test for this site? Provide evidence of sequential test application. Specific consideration will need to be given to the design of the properties and layout of the site to account for the significant depth of flooding. Careful consideration will need to be given to the design and layout of the development to ensure that it is in line with the flood risk design guidance.	Include wording: The FRA must consider the residual flood risk to the site in the event of breaching and/or overtopping of the tidal River Ouse. Where possible, a sequential approach should be adopted regarding the layout of the site, with the most vulnerable development situated in areas at lowest risk of flooding (i.e. shallower flood depths).	Agree - Include wording: This must consider the residual flood risk to the site in the event of breaching and/or overtopping of the tidal River Ouse. Where possible, a sequential approach should be adopted regarding the layout of the site, with the most vulnerable development situated in areas at lowest risk of flooding (i.e. shallower flood depths).
E1.14 West Lynn - Land West of St Peter's Road Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Object - Whilst there are no designated heritage assets on the site, a grade II listed building lies to the east of the site. Any development will need to preserve the nearby listed building	Add criterion re nearby listed building. 'Development should preserve the nearby listed building and its setting'	Agree - Add criterion re nearby listed building. 'Development should preserve the nearby listed building and its setting'

			and its setting. At present the policy does not refer to the listed building or its setting.		
E1.15 West Lynn - Land at Bankside Policy	Mrs Elizabeth Mugova	Planning Advisor Environment Agency	'Submission of a site specific FRA' is duplicated in the policy wording (points 2 & 7).	Remove duplication.	Agree – delete duplicated point 7.
E1.15 West Lynn - Land at Bankside Policy	Mrs Elizabeth Mugova	Planning Advisor Environment Agency	The location of the site means that a bespoke flood defence breach analysis will be required to demonstrate the residual flood risk to the site.	Include wording: 'The FRA must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.'	Agree - Include wording: 'This must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.'

E1.15 West Lynn - Land at Bankside Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Object - This site incorporates the former Del Monte site in West Lynn adjoining the River Great Ouse. Like other sites along the riverside in West Lynn, it is sensitive in terms of its potential impact on the historic environment. The site is clearly visible from King's Lynn Conservation Area on the east side of the river and forms the backdrop to this heritage asset and many others (including listed buildings). Part of the significance of the conservation area is its riverside, with views across to a predominantly rural backdrop at West Lynn, including views of St Peter's Church. Views from this part of West Lynn back towards the conservation area are also significant, and one can walk up to the western riverbank and	Add criterion re heritage assets. 'Development should conserve and where appropriate enhance Kings Lynn Conservation Area and associated listed buildings and their settings'	Agree - Add criterion re heritage assets. 'Development should conserve and where appropriate enhance Kings Lynn Conservation Area and associated listed buildings and their settings'
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			<p>enjoy a panoramic view of the historic quayside of King's Lynn (the introductory paragraph to West Lynn on page 100 recognises such views, noting "there are significant views from and towards the historic waterfront of King's Lynn"). We therefore have some reservations with regards to the redevelopment of this site, particularly on the number of dwellings proposed. It could result in an overly urbanised riverside, with a dense and/or tall form of development. This could cause harm to the significance and setting of the conservation area and other heritage assets. We request that greater clarification is provided with regards to the redevelopment of this site, including the number of dwellings that can be reasonably</p>		
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			<p>delivered. The policy itself also needs to state that development should conserve and enhance the significance and setting of nearby heritage assets, particularly the conservation area and listed buildings.</p>		
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