KING'S LYNN MASTERPLAN

External Consultee Responses

External Consultee Responses Summary 2

PUBLIC CONSULTATION 1

Historic England 3
5 March 2026

Natural England 8
9 January 2026

PUBLIC CONSULTATION 2

King's Lynn Civic Society 10
8 June 2026

Historic England 18
15 June 2026

Lead Local Flood Authority 36
28 May 2026

NHS NSICB 38
12 June 2026

Borough Council of
King's Lynn &
West Norfolk

External Consultee Responses

Statutory consultees and local stakeholder organisations have submitted detailed responses to the draft masterplan alongside stakeholder engagement workshops.

This includes;

CONSULTEE	RESPONSE SUMMARY
Historic England	We welcome the development of a heritage-led masterplan which not only seeks to protect and enhance its built form but also actively seeks to repurpose underused historic buildings. Alongside public realm enhancements along the Riverfront, improved connectivity, and considered approaches to wayfinding and permeability including Rail to River, the Masterplan provides an opportunity to deliver positive outcomes for the historic environment, residents and visitors.' Detailed site specific comments on opportunity sites also provided.
Natural England	'..continues to support the overall direction of the Masterplan. We particularly welcome the continued commitment to Strategy 4: Harness Natural Assets, including the emphasis on green and blue infrastructure, nature-based solutions and improved connections with the riverfront'
Norfolk County Council	Officers at Norfolk County Council (NCC) have a strong collaborative working relationship with the Borough Council of King's Lynn and West Norfolk on transport matters. Together we have produced the King's Lynn Local Cycling and Walking Infrastructure Plan (LCWIP) adopted by both councils in 2022. More recently we have worked in partnership to produce the new King's Lynn Transport Strategy (KLTS) which was also adopted by both councils in spring 2026. Working collaboratively, NCC officers have been involved in the development of the King's Lynn Masterplan. The document sets out a strong vision for enhancing the town by making better use of underutilised areas to make it a more attractive place to live, work and visit. Many of the ambitions will rely on changes to the transport network and car parking provision. On this aspect the transport elements of the King's Lynn Masterplan align with the KLTS.
King's Lynn Civic Society	'King's Lynn Civic Society have supported this masterplanning process, have attended various events throughout the programme since 2025, and have previously submitted a number of contributions. We think it is an important document to prepare and that the team appear to have worked hard to involve the community and integrate local thoughts and ideas into the proposals. We think the presentation of the final draft document is good and generally sets out ideas and aspirations well.' Site specific comments also provided.
Environment Agency	Recommendation for strategic level flood risk modelling alongside the new local plan. Identified site specific maintenance/upgrade work required.
Norfolk & Suffolk Integrated Care Board	'The ICB supports the principle of regeneration areas, mixed-use development and housing, where these are planned alongside the health and care infrastructure needed to serve both the existing and future demand from communities. Early engagement with the ICB will be important to ensure health infrastructure requirements are considered at the same time as transport improvements, public realm investment and funding opportunities. Norfolk and Suffolk Integrated care Board (NSICB) supports the overall ambitions of the Masterplan, particularly where this improves housing quality, active travel, green infrastructure and access to community facilities including healthcare. NSICB would like to request early and ongoing engagement as site proposals, delivery phasing and funding mechanisms are developed. This will ensure health infrastructure requirements can be considered alongside housing growth.'
Lead Local Flood Authority	The LLFA notes that some of the developments are proposed are within areas of flood risk. Some of these development sites are "more vulnerable uses", such as the residential developments. The Masterplan also acknowledges that in the future the whole study area will be at risk of flooding. It is not clear to the LLFA whether the sequential tests and exception test have been applied and how these have been passed. It is possible that some of the proposed housing sites may not be suitable for new housing and an alternative plan should be considered and held in reserve. Request for further site specific information and study work at next stages of site feasibility.

Historic England

Our ref: KL Masterplan
Your ref:
Date: 05/03/2026

By e-mail to:
[redacted]
Regeneration Programmes Officer
Borough Council King's Lynn and West Norfolk

Direct Dial: [redacted]
Mobile: [redacted]

Dear [redacted],

Ref: King's Lynn Masterplan – Initial Comments

Firstly, apologies for the delay in getting these requested initial high-level comments to you. Thank you for bearing with us but hopefully these will supplement verbal comments Jana and I have made during meetings including those held in January.

These comments are informed by the following documents:

KLM Riverfront, Landscape and Public Realm presentation 21/01/26
Mikhail Riches Boal Quay presentation 16.12.25
KLM Presentation 16.12.25
High Level Public Consultation Boards

General comments

- We are pleased to have been engaged at an early stage of the Masterplanning process and welcome the principles of the plan which builds on work undertaken between BCKLWN and Historic England during the HAZ including the Unlocking Brownfield report commissioned in 2018.

- The vision and concept shared to date sets out an ambitious vision for development within King's Lynn alongside vital public realm enhancements along the Riverfront, improved connectivity, and approaches to wayfinding and permeability including Rail to River, which can help restitch the town and unlock huge potential for positive outcomes for the historic environment and residents and visitors.

- We are supportive of the principles set out in the consultation boards are pleased to see heritage features throughout the King's Lynn 'Grand Vision'.

- We consider it important that all six Strategies aim to either adopt a heritage-led approach or consider the historic environment an opportunity rather than a constraint.

We would at this stage say we note that much of the emphasis of our engagement has been around key opportunity sites, but as previously discussed, unlocking King's Lynn's potential

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requires a holistic approach, and as such, we look forward to discussing how our advice can add value to other strands of the Masterplan strategies.

Riverfront
In principle we welcome proposals which would activate the Riverfront as an asset offering opportunities for economic regeneration, increased community use, and celebrating heritage including the historic lanes.

- We welcome proposals which increase greening (as appropriate both in terms of species suitability for such a location, and planting depths).
- We support the concept shown on p.24 which gives significance to the historic lanes and the role they should play in wayfinding and framing key views.
- We support opportunities to increase pedestrian and cycling routes and provision to provide a safer, accessible space to be enjoyed by more than car users.
- In terms of design layouts at 2.6, future consideration will need to be given to design and materiality to ensure deliver of a high-quality scheme. From the concepts provided within the presentation, we welcome those options which seek to narrow the road and provide a more welcoming public realm.
- We are pleased to see a bold vision set out in the Transport section. As with many elements of the Masterplan, we would expect to have further comments to make as more detail designs come forward.
- In principle, we support proposals for King's Staithe to encourage a community space which complements existing commercial opportunities to increasing outdoor dining.
- Consideration would be needed as to how this space would look in autumn/winter to avoid it looking uninviting.
- In terms of greening and planting, there would be merit in sharing the developed this vision with our Landscape Architect as proposals progress.
- Materiality of seating/stage choice will be particularly important in relation to exposure to elements and flood risk.
- We welcome the approach to Devil's Alley to create a simple public, green space which would enhance an area of land which currently has a negative impact within the Conservation Area.
- We also welcome the early engagement of the local community in the drawing up of these proposals.

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- With regard to potential ‘commercial opportunities’ at the entrance to Devil’s Alley, our initial view would be a) the design of any structure is not visually intrusive b) it responds to surrounding context and c) it complements rather than competes with other nearby offers.

- Ensure that materiality responds appropriately to the Conservation Area and character of the area.

- Ensure any lighting strategy avoids introducing overly tall structures which either dominate the area or impact on the setting of heritage assets (either through height or excess spill/light pollution).

- The devil will be in the detail, and we would be happy to provide further advice on this element of the Riverfront strategy alongside your Conservation Officer to ensure any design mitigates potential harm to the setting of heritage assets and succeeds in enhancing the conservation area.

Church Street
We welcome proposals to redevelop the Church Street carpark which at present is depressingly large expanse of grey in the historic core of King’s Lynn.

Re-development of this site offers an exciting opportunity to restitch the town and reintroduce lost urban grain, and we are pleased to see this acknowledged in the presentation and preferred option.

As we have previously noted in earlier consultations, this site is in a significant and sensitive location, and we reiterate the importance of high-quality design which responds to context and setting of heritage assets.

- We understand the existing challenge of the site and lease conditions. If redevelopment is not possible in the medium term, we would welcome any opportunity to improve the surface and appearance of the car park to visitors.

- Reference to historic maps would be useful to help understand historic layout and roof typography.

- We note some buildings are four storeys. Our initial view would be 3-3.5 storeys would be appropriate. Any taller will require robust justification.

- We are pleased the concept plans have opted for a Townhouse style and active frontages which would create a sense of human scale enclosure, which could enhance how the Minster is experienced.

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- Of the Roofscape options, Option 1 responds better to surrounding, predominantly pitched roofs. We would like to see to some variety to break up the roofline to complement the existing townscape.

- Option 2 offers more variety and rhythm, however, the 'blockier' massing of the 3- 4 storey building on the corner closest the Minster jars with the rhythm along Church Street.

- There is opportunity on this site for buildings to step up or create high quality corner buildings/landmarks, however, these should avoid massing which conflicts with the aims of restitching the townscape.

- It would be helpful to see elevations of the two options.

Boal Quay
Similar to Church Street, the Boal Quay site is one we have previously offered advice on, and we are pleased to do so again.

- We again welcome that the surrounding historic environment has informed building lines and site layout.

- The creation of a wetland/community space is a positive both in terms of placemaking and connecting outer King's Lynn with the historic core.

- We would echo comments made at the November stakeholder engagement sessions that the success of this scheme both in placemaking terms and community buy-in will be in high-quality design which responds positively to the landscape, river, historic environment, and long views of South Quay.

- We are pleased to see that the Site Options 2A and 2B in the presentation allow glimpsed views of the commanding Minster.

- Both these options also offer a greater sense of connectivity and movement from landscape to townscape.

- These options create more smaller permeable development which responds well to the marshland and informal arrangement of existing townscape.

- The gable end on approach – informed by existing townscape is positive but high-quality detailing (fenestration, brickwork, decorative detail or even artwork reminiscent of ghost signs) would be important to ensure these strong features do not become overly domineering.

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- A wayfinding strategy for this site would be encouraged for visitors to understand how the community wetland leads to the Riverfront and then the historic core.

- There are positives in creating a stronger building line along Hardings Way which could flow and lead towards either the Riverfront or town centre. However, from the images in the presentation we would have concerns about the scale and massing due to the block nature of illustrations, potential contrast with other development, and proximity to the Grade II* Greenland Fisheries.

- As with Church Street, it would be helpful to see elevations and further detailed designs when they become available.

Summary
We welcome the ongoing engagement on the Masterplan and are supportive of the aims and vision, which we are pleased to see proactively considers how the historic environment can shape place and contribute to growth.

We welcome the principles of the Riverfront strategy but anticipate providing more detailed advice as these develop, especially in relation to greening, planting strategies, lighting and materials.

In relation to the strategically important development sites at Church Street and Boal Quay, we are supportive of the principles but have – unsurprisingly – made some comments about the design, detailing, height, scale and massing, which we would be happy to pick up with you at a future meeting.

We welcome and encourage continued engagement with ourselves as the draft Masterplan develops. However, as proposals progress for site specific development, further detailed advice will likely fall under our Enhanced Advisory Service.

We hope you find these comments helpful. Please do not hesitate to drop us a line if you would like to discuss further.

Kind regards,

[redacted]
Historic Places Adviser, East of England
[redacted]

cc [redacted], Team Leader, Development Advice
[redacted], Inspector of Historic Buildings and Areas

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Date: 09 January 2025
Our ref: 535696

[redacted]

BY EMAIL ONLY

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Dear [redacted]

King's Lynn Masterplan

Thank you for your email highlighting the public consultation of the King's Lynn Masterplan, dated 03 December 2025 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England's Advice

Natural England welcomes the opportunity to comment on the emerging King's Lynn Masterplan. While we note that this is not a statutory consultation, we appreciate the invitation to contribute at an early stage, particularly given the alignment with Natural England's ambitions around Building Better Places, Improving Health and Wellbeing, and supporting the delivery of multifunctional green and blue infrastructure.

We strongly recommend that all green and blue infrastructure within the Masterplan is designed and delivered in accordance with Natural England's Green Infrastructure Framework (GIF), which sets out standards for accessible, high-quality, biodiverse, climate-resilient green spaces that support nature recovery, active travel, health and wellbeing, and environmental sustainability. Applying the GIF will help ensure that green infrastructure is planned strategically, functions effectively at town-wide scale, and connects seamlessly into the wider landscape.

We have reviewed the consultation boards and provide the following comments:

1. **Masterplan Strategies – Harnessing Natural Assets**
   Natural England supports the overall direction set out in the six Masterplan Strategies, and in particular the commitment to *"Harnessing Natural Assets"* by celebrating and enhancing King's Lynn's riverfront, green spaces and wider green infrastructure. We strongly welcome the ambition to ensure a high-quality environment for both existing and future users.
2. **Green Corridors and Connectivity to the Wider Landscape**
   The Masterplan's intention to deliver a series of *new and/or enhanced green corridors* through the town is positive and supported. However, the diagrams provided do not clearly illustrate how these corridors will connect to the wider landscape beyond the urban area. Strengthening these links—visually and functionally—would help support ecological connectivity, active travel, and wider nature recovery opportunities.
3. **Nature-Based Solutions and Water Management**
   We welcome the proposal for some of the green spaces to contribute to flood prevention and surface water management, including their potential role as water storage areas during high-water events. Embedding nature-based solutions into the Masterplan aligns strongly with national best practice. Natural England encourages further exploration of additional

Sustainable Urban Drainage System features such as rain gardens, bioretention planting, and other forms of sustainable urban drainage within streets and public realm design.

4. **Naturalistic Green Spaces and Opportunities for Biodiversity Enhancement**
   We particularly welcome the proposed naturalistic approach for Boal Quay Ecological Park and the inclusion of a nature reserve within the proposals for West Lynn. As noted in the Norfolk Local Nature Recovery Strategy, the southern part of the West Lynn area presents a valuable opportunity for creating *open mosaic habitats on previously developed land*. Delivery of this habitat type would contribute meaningfully to local and national nature recovery targets.
5. **Incorporating Green Roofs and Green Walls**
   Natural England recommends that the design principles under the "Harnessing Natural Assets" strategy explicitly reference the integration of green roofs, green walls, and other forms of vertical greening. These features can help improve urban biodiversity, moderate temperature, improve air quality, and enhance townscape character.
6. **Protection and Enhancement of Key Views**
   We support the Masterplan's recognition of the importance of protecting and enhancing key historic and landscape views. Early identification of strategic viewpoints is beneficial and should remain central to shaping building heights, massing and public realm design.
7. **Making More of the River**
   The focus on activating the riverfront through improved public spaces, enhanced viewpoints and increased leisure opportunities is strongly welcomed. The River Great Ouse and its environs are a defining natural and cultural asset for King's Lynn, and the proposed approach represents a positive and sensitive way to celebrate this unique setting.

If you have any queries relating to the advice in this letter please contact me using the details below.

Yours sincerely

[redacted]
Sustainable Development – Norfolk and Suffolk
[redacted]

KING'S LYNN CIVIC SOCIETY
Member of Civic Voice
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[redacted] 08/06/2026

King's Lynn Masterplan Team
BCKLWN
King's Court
PE30 1EX.

Dear [redacted]

King's Lynn Masterplan (Draft Final)
Consultation May–June 2026

We write to provide a written response to the consultation on the draft King's Lynn Masterplan, which we understand will shortly be finalised with a view to it being adopted by BCKLWN later this summer.

King's Lynn Civic Society was founded 79 years ago to protect our town's rich heritage and to influence the way our town evolves to meet challenges and change. We always want the best for King's Lynn and to protect and integrate our historic assets, whilst supporting appropriate innovation and high-quality development and regeneration.

We understand that the Masterplan aims to pull together current projects and previous plans, and to present a cohesive vision for enhancement and development of the town in coming decades. We all assume that local government reorganisation will shortly replace BCKLWN and NCC with a West Norfolk Unitary Authority, and that a new Norfolk/Suffolk combined authority may give a new regional mayor significant decision-making powers and funding opportunities for the region. Therefore, we recognise that this is a very important time to set-out regeneration and growth plans for King's Lynn.

General Comments

Kings Lynn Civic Society have supported this masterplanning process, have attended various events throughout the programme since 2025, and have previously submitted a number of contributions. We think it is an important document to prepare and that the team appear to have worked hard to involve the community and integrate local thoughts and ideas into the proposals.

We think the presentation of the final draft document is good and generally sets out ideas and aspirations well. The online presentation of the masterplan is particularly useful, being clear, well written and setting out the objectives and proposals somewhat more succinctly than the main Masterplan document itself.

Masterplan Boundary

One could argue that the boundary is slightly inconsistent in places. It extends over most of the St Margarets and St Nicholas ward, but cuts out a part of it in the east.

There is a compelling case to include the Hardwick Cemetery in the study area, as it certainly has a historic and contemporary 'town centre' use. It is an important green space. One could also argue that Extons Road/Holcombe Avenue and everything west of the railway line in that area should therefore also be included.

It is less clear cut as to why areas south of Harding's Pits (South Lynn) or the area north of Ferry Square (West Lynn) have been included.

Vision

The overall Vision Statement seems adequate and appropriate.

The only thing we might suggest adding is that the time period might be set out as *over the next 20 years* ***and beyond***. We know that, in reality, 20 years is not a long time. The Urban Development Strategy (UDS), which might be considered the precursor to this Masterplan, is now 20 years old – and not too much of it has yet been achieved.

Strategic Objectives

We broadly support all six 'Strategy (surely *Strategic*?) Objectives' – with some concerns/provisions as follow:

1. ***Evolve and Adapt:*** We are not clear why the 'Evolve and Adapt' objective has short-, medium- and long-term objectives, but the other objectives don't. Also, the definition of 'short', 'medium' and 'long' term is not given here (it is later). We think timescale needs to be defined here if projects are going to be divided into these categories.

   SHORT TERM
   Use quick wins to improve streets and public spaces:
   - Yes, to Devil's Alley garden.
   - Not sure what cycling and pedestrian improvements can be achieved at South Gate in the short term. But in principle we support this objective.
   - Yes to the STARS gyratory project (and related cycle access improvements connecting to it).

- Not clear what 'shop front improvements' are (unless you mean the Shop Front Design Guide – which we support and is long overdue, but will be an organic process over many years …?).

Support temporary, flexible and meanwhile uses

- Not entirely clear what this means and think, realistically, any major progress at Sommerfeld and Thomas is 'medium term'.

Introduce low-cost interventions that test future, long-term ideas and improvements

- Yes – we support these 'trials' (although not clear how that can work until the port land and land north of Wisbech Road is secured and cleared – so that sounds like medium-term). We think the most important short-term trial is to get traffic off of South Quay. Closing the Church Street car park with a view to its redevelopment and encouraging maximum use of the multi-storey car park also seems possible.

Improve the accessibility and legibility of key routes (e.g. Rail-to-River)

- Baxter's Plain should be short term with the STARS funding (?). We supported the Graham Massie 'key routes' initiative, but have been heartily disappointed with the Rail-to-River work. These routes need appropriate investment and this is probably a medium-term project.

Prepare sites for future development

- We support renewing the pool but not moving it to Lynnsport. It is probably not a short-term project?
- Prepare Church St for redevelopment.

Develop business cases, funding routes, partnerships and land assembly

- We would support developing a design/budget/programme to create the green space at Boal Quay which we think could then be a short-term project.
- Developing clear plans for the land north of Wisbech Road and at West Lynn also seems possible.
- Lean on the developer at the old Post Office to get that started – also a 'short-term' project?
- Reopening Custom House and the Guildhall should be listed as short-term projects?
- Developing clear plans for the Conservancy Board Building ('old baths') and 33–39 St James Street (*Kwik Fit* building) should also be 'short-term'?

MEDIUM TERM

Rework existing buildings with minimal intervention

- Yes – we support getting Debenhams back into use as a short-to-medium term project.

Retain heritage character while enabling new uses:

- We would support Sommerfeld and Thomas and the Silo Site being redeveloped in the medium term - if this is possible.

Reinforce active ground floors and diverse uses:

- See above about Debenhams and the Post Office.

Enhance key public spaces (riverfront, squares, High Street)

- Devil's Alley and Baxter's Plain should be short-term. We have noted the potential to get the Boal Quay green space started. The others might be medium-to-long term?

Other Medium Term

- We think it should be a short- to medium-term goal to deliver redevelopment of Church Street.
- It should be a medium-term goal to commence the West Lynn and Port Land redevelopments as well as South Gate, even if it is a phased process.
- Have Conservancy Board building back in use.

LONG TERM

Enable phased growth aligned with infrastructure improvements

- Agree – completing the transport infrastructure transition is essential – but it will be phased and can start now.

Deliver major mixed-use, cultural and leisure destinations:

- Agree – deliver mixed use development at key sites – but it can be phased as long the overall objectives for the end product are in place.

2. ***Land Uses and Local Needs:*** We support in principle all of these ideas – but surely they also need short-, medium- and long-term projects to be fully identified?

3. ***Harness History and Culture:*** We again support in principle all of these ideas – but think they should simply be integrated into the planning and design process for individual projects?

4. ***Harness Natural Assets:*** We support this in principle. Devil's Alley and Baxter's Plain should be identified as the short-term enhancement projects and the Boal Quay green space should be shown as short to medium term.

   There is some key green space which is in the study area but not shown on the plan (e.g. Harding's Pits). We are not clear why car parks are shown 'green' (especially if they are going to be multi-storey).

5. ***Transport and Access:*** This is so important and we feel should, to a great extent, be leading/shaping the approach to individual regeneration opportunities (and programming). Short-, medium- and long-term projects should be clearly identified.

Whilst we think multi-storey car parks are part of the answer, we think that simply reducing the need/desire to travel into town in a car should be the more important goal. 20% households don't have a car and this is likely to rise, and sustainable alternatives would encourage that shift. In larger urban centres 30–40% of households don't own a car. Even with a rural hinterland, providing alternatives to car ownership will reduce traffic and parking issues.

MSCPs are expensive. They can also produce 'dead zones' in an urban area. If we are going to have them, we think they would ideally be integrated into mixed-use development? (Undercroft parking might also assist flood resilience in new buildings?)

6. ***Built Form and Public Realm:*** We support this objective in principle – especially the development of pocket parks and 'micro-destinations'. We consider this very important in higher density development – especially in relation to having sheltered sitting areas with natural sunlight within residential development.

   What we don't support is the type of higher density development that is actually being delivered most regularly in the town centre at present – pokey small flats with no outside space … and HMOs.

   Regarding high quality public realm, we continue to support production of a clear design guide with an agreed palette of materials (which would make subsequent management and maintenance much easier).

   Public realm and green space delivery must come with fully costed and resourced management plans. There is no point in planting new trees if they are going to die…

Illustrative Masterplan

We understand that the 'quantum of development' has been calculated by estimating the potential of each of the 24 (26?) sites identified. We perhaps expected to see a higher number of new homes.

We have the following comments on the 24 sites identified:

King's Staithe Square: We see this as an important established public realm space that has often been used successfully for events. In this respect we do not see it as high priority to alter. We are also somewhat sceptical of the soft landscape elements in this plan and wonder how practical it is (underground constraints / occasional tidal flooding) and whether it would actually make the space less flexible for use. Nevertheless, we would be interested in reviewing more detailed proposals.

South Quay: Although our committee and others are divided about the soft landscape elements along the quay, we do agree that it could be useful to provide shelter, spatial definition and amenity benefits here. A more coordinated, high-quality approach to public realm design could/should replace the setting outside Marriotts (which we regard as an eyesore). Tidal flooding would need to be factored in to detailed design. Removal of car parking would be generally welcomed. (Trial removals should be started asap.) More river (boat) activities should be encouraged.

Devil's Alley: We support development of this garden idea and think it should be seen as a short-term 'quick win'. We think it could be combined with the idea of the Hansa wooden crane tower that has recently been promoted (and could provide the 'opportunity for commercial'?). We still have some reservations about the long-term strength of the Mill Fleet revetment and think that should be properly investigated prior to any work commencing.

Sommerfeld and Thomas: We strongly support redevelopment of this site and think it is essential for successful regeneration of the South Quay in general. Finding the right end user is paramount. We would like to think the project is short term but wonder how realistic that timescale is.

Boal Quay: In principle KLCS support a mixed-use redevelopment of this site. We think the large flat roof blocks in the artist's impressions for this area look austere and in fact we think tend to demonstrate that they would not be suitable for this setting. A more thoughtful variety of pitched rooftops would be much more sympathetic to the rest of the waterfront and the Friars Conservation Area. A couple of the illustrated blocks may in fact be multistorey car parks, and again we think if this is the case, buildings would be better designed as 'mixed-use', with undercroft parking. Vehicular access should not compromise the bus lane and pedestrian/cycle routes.

This area has received many previous proposals. In recent years there has been strong consensus that the former Nar Loop and its quay front will be retained as a 'wetland public open space'. We therefore think that that aspect of the masterplan should be brought forward soon – in the short-to-medium term. It will assist in bringing the area back to public use and will better present the other areas for redevelopment.

Common Staithe Square: We support enhancement of the river front public realm in this area, but would need to review any plans for residential development on its merits when brought forward. Any scheme must not compromise the operational flexibility of the Corn Exchange, which we regard as our premier theatre and concert hall. Repurposing of the Pilots' Office is also key to the success of this area. Loss of parking here and in the TMP must obviously be mitigated by creation of new parking or alternative transport options elsewhere.

St James Swimming Pool: We support development of new leisure facilities and accept that a modernised pool will be required at some point. We are still sceptical of the rapidity with which this proposal has come forward, given that engineers won an award for their energy-efficient new heating system for this facility only 3 years ago, in 2023. We do not support moving the main West Norfolk pool to Lynnsport and we are not convinced that this site will represent prime real estate for residential development. We fear if the relocation and demolition proceeded with haste, the town centre will be left with another long-term derelict site.

Debenhams: We strongly support any plan to get this building back into appropriate town centre use as soon as possible. Plans must respect the best fabric of the building. We are happy with a mixed-use approach, but retaining suitable rear delivery access seems necessary.

Port area and timber yard: Although we have supported redevelopment of this area in the past, we think the plan offered here is sub-optimal. A large area of ground level parking is a poor use of space and will make a poor transition between port and town and we regret that there appears to be no effort to safeguard the railway corridor into the port site. We see reinstatement of a railhead to the port as a significant infrastructural opportunity that will reduce dependence on road freight.

West Lynn: Support. We are pleased to see a mixed-use development approach, including improvements to the ferry infrastructure. Hopefully a medium time frame is achievable.

Land north of Wisbech Road: Support. Enhancement of the Nar corridor needs to be considered in this scheme. We are not opposed to the parking idea as long as it doesn't diminish the overall site design.

Church Street car park redevelopment: Support – but think it should be short to medium term. What is stopping this coming forward? It could encourage optimal use of the existing multi-storey car park. (We also still think it could be partly used as a 'southern' transport interchange for buses off Harding's Way.)

South Gates Regeneration: Support – but don't think a short time frame is achievable (at best medium and phased?). Urban realm design must drive it. We do not want a large road to dominate the centre of the site. The route through the gate should be retained as a primary cycle/pedestrian route (perhaps also available for other ceremonial use).

Former Post Office: Anything that can be done to push the developer forward on this landmark regeneration project would be supported. Delivery of the Baxter's Plain enhancement may help. However, when the scheme was granted, we did not support the large ground-floor pub proposal – and think that that outcome would actually undermine the whole scheme. We think a mixture of community amenities on the ground floor would do much more to support a new residential community in this area.

Inner Purfleet: We have seen previous plans for this which seemed overly complicated and expensive, but enhancing the small areas next to it would be welcomed.

Pilots' Office: We strongly support repurposing the baths side of this building asap if the Conservancy Board can be relocated.

Hillington Square: We will review plans when they are made available.

Former Carnegie Library: We will review plans when they are made available.

Chapel Street Car Park: We would review plans when they are made available – but it is one car park that may be worth retaining given the neighbouring buildings.

Austin Street Car Park: We would wish to see the plans for this to understand the cycle lane proposal. It has been the coach park for the town but increasingly now seems to be requisitioned by Post Office staff (?).

Baker Lane Car Park: We will review plans when they are made available – but it is another car park that may be worth retaining.

Old Market Street: We will review plans when they are made available.

Tuesday Market Place: An iconic space and we would support removing parking from it in principle. We would need to see any plans for public realm works and would be very interested in being included in a design development team if funding materialised.

Saturday Market Place: As for TMP above.

Juniper Austin and Albert Street Car Parks: We think there is a compelling case for mixed use development on this site and feel it should be considered a medium-term project.

St James Street (Kwik Fit): We would strongly support bringing this building back to use and think if there is any chance of the LPA bringing it forward it should be considered a short to medium term project – not long term.

In summary, King's Lynn Civic Society support the King's Lynn Masterplan and thank the project team for their work in developing this guide to regeneration aspirations in the town.

Kind regards

[redacted]

Chairman

Historic England

By e-mail to:
[redacted]
Regeneration Programmes Officer
Borough Council King's Lynn and West Norfolk

Our ref: PL00801955
Your ref:
Date: 15/06/2026

Direct Dial: [redacted]
Mobile: [redacted]

Dear [redacted],

King's Lynn Masterplan

Thank you for inviting Historic England to comment on the King's Lynn Masterplan.

We welcome the production of this Masterplan and are pleased to have been engaged during the early stages of the Plan's development. We welcome its principles which build on work undertaken between BCKLWN and Historic England during the Heritage Action Zone, including the Unlocking Brownfield report commissioned in 2018.

Importantly, the Masterplan establishes a positive strategy for the conservation and enjoyment of the historic environment which can continue to guide regeneration and place-making beyond the transition to the new local authority arrangements.

Strategic Comments
We are pleased to see that the Masterplan has been informed by a broad evidence base, including a number of studies, strategies and projects with a strong heritage focus, many of which Historic England has previously supported. This document translates these shared ambitions into a coherent framework for future investment and delivery, whilst demonstrating a clear understanding of King's Lynn's historic environment and the important role it can play in supporting regeneration, growth and place-making objectives.

Importantly, the Masterplan provides an opportunity to establish a positive and enduring strategy for the conservation, enhancement and sustainable use of King's Lynn's historic environment which can continue to guide investment and regeneration over the long term and ensure that growth, regeneration and environmental improvements are informed by an understanding of local character and heritage significance.

We note that the Masterplan has continued to evolve since our previous engagement, with a number of additional sites and opportunity areas now incorporated within the overall vision. Whilst we have sought to provide detailed comments where appropriate, the strategic nature of the document and the level of information currently available for some sites inevitably limits the extent to which site-specific advice can be provided at this stage.

In many cases, the principle of development will be acceptable; however, more detailed consideration of matters such as scale, massing, layout, design and impacts on heritage significance will need to be undertaken as proposals progress. For clarity, this letter does not

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reflect our obligation to provide further advice on specific proposals where we consider these would have an adverse effect on the historic environment. However, as the Masterplan provides a long-term framework for regeneration and growth, we look forward to continuing to engage with the Council and its partners at the pre-application stage as individual projects and opportunity sites evolve.

Vision
The vision described on p.24 (and reinforced on p.26) is commendable. We welcome the development of a heritage-led masterplan which not only seeks to protect and enhance its built form but also actively seeks to repurpose underused historic buildings. Alongside public realm enhancements along the Riverfront, improved connectivity, and considered approaches to wayfinding and permeability including Rail to River, the Masterplan provides an opportunity to deliver positive outcomes for the historic environment, residents and visitors.

In particular, we welcome that ‘Heritage Assets’ and ‘Built Form and Building Height’ are given prominence in the Spatial Opportunities (p.19), given the vital contribution these make not only to the character of King’s Lynn, its Conservation Area, and sense of place but also the role it should take in informing future design and placemaking.

From Vision to Strategies (p.26): We welcome this diagram, which clearly illustrates the relationship between the Masterplan's overarching vision and the individual strategies through which it will be delivered. Importantly, it demonstrates that the historic environment is not a standalone consideration but a cross-cutting asset which contributes to a wide range of outcomes, including regeneration, culture, public realm, connectivity and environmental quality. This integrated approach should help ensure that individual projects contribute towards a coherent long-term vision for King's Lynn rather than being delivered in isolation.

The Masterplan at a glance (p.3): The summary is currently weighted towards numerical outputs such as housing, employment and investment. Whilst these are important indicators of success, they do not fully capture the Masterplan's wider ambitions in relation to heritage, place quality and the enhancement of King's Lynn's unique character.

Consideration could therefore be given to including reference to the reuse of historic buildings, public realm improvements and other qualitative outcomes which contribute to successful and distinctive places, which should also include community well-being, inclusion and pride in place.

Document Accessibility
The Masterplan document is generally well-structured, clearly presented and easy to navigate. However, given the Masterplan’s role in shaping the future of King’s Lynn, it is important that it remains accessible not only to planning and regeneration professionals, but also to residents, businesses, community groups and other stakeholders.

Consideration should therefore be given to ensuring that technical terminology and specialist concepts are clearly explained where possible. As a minimum, the inclusion of a glossary

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would assist the readers in understanding terminology used throughout the document. For example, references to concepts such as ‘landmark buildings’, ‘hubs’, ‘nodes’ and other planning or urban design terminology may not be immediately clear to all audiences.

Improving the accessibility of the document in this way would help support wider engagement with the Masterplan and encourage a broader understanding of its objectives and proposals.

The long-term success of the Masterplan will depend in part upon securing understanding and support from local communities and stakeholders.

Strategy 1: Evolve and Adapt and Strategy 2: Land Uses for Local Needs

We welcome these strategies and the associated guiding principles, particularly those which seek to repurpose underused buildings and bring historic assets back into active and sustainable use. Historic buildings have an important role to play in supporting regeneration, economic vitality and local distinctiveness, and their reuse can help reinforce King’s Lynn’s unique character whilst contributing to wider growth objectives.

We are pleased to see this includes consideration of flexible, meanwhile and temporary uses, alongside long-term redevelopment opportunities. Such approaches can help build confidence, support local enterprise and demonstrate positive change at an early stage, particularly within areas of the High Street where vacancy and underuse currently detract from the town centre experience. In this respect, interventions focused on the southern end of the High Street have the potential to deliver visible benefits for residents, businesses and visitors whilst helping to support long-term regeneration objectives.

In relation to sections 1.2.1 and 1.2.2, we suggest that references to the reworking and retention of heritage character and assets are strengthened through the inclusion of the term ‘sympathetic’, consistent with the approach set out in paragraph 135(c) of the National Planning Policy Framework. This would reinforce the importance of ensuring that adaptation and change respond positively to local character, historic significance and context.

Successful delivery of these ambitions will require a coordinated approach to investment, ownership and partnership working. We would encourage the identification of priority buildings and opportunity sites where intervention could deliver the greatest regenerative impact. We would welcome the opportunity to continue working with the Council in developing appropriate and sustainable solutions for these assets.

Strategy 3: Harness History and Culture

We very much welcome the inclusion of this strategy and are pleased to see that it has been informed by the existing Culture and Heritage Strategy, alongside the emerging Conservation Area Appraisal and Management Plan and Shopfront Design Guide.

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We support the recognition of the historic environment as one of King's Lynn's defining assets and welcome the Masterplan's ambition to place heritage and culture at the heart of the town's future regeneration. Heritage should not be viewed solely as something to be conserved, interpreted or celebrated, but as a key component of King's Lynn's future prosperity, identity and attractiveness. The historic environment contributes significantly to the town's distinctiveness, supports tourism and investment, and provides the character and sense of place that differentiates King's Lynn from competing centres.

We therefore welcome the ambition to celebrate and better reveal King's Lynn's rich heritage, culture and identity. However, the success of this strategy will ultimately depend on ensuring that these principles continue to inform future decision-making as individual projects come forward. The strategy provides an important opportunity to establish a positive and enduring framework for the conservation, enhancement and sustainable use of the historic environment, helping to guide future investment, development and public realm improvements across the town.

3.1.1 – 3.1.3 Signpost and Appreciate Heritage and Townscape
We are pleased to see these objectives included, particularly those which seek not only to improve access to the town's heritage but also to enhance understanding and appreciation of it. We welcome the recognition of King's Lynn's key views, landmark buildings and skyline as important elements of local character that should be celebrated and taken into consideration as the town evolves.

In addition to landmark buildings and principal views, future initiatives should also recognise the contribution made by King's Lynn's historic street pattern, yards, lanes, waterfront spaces, roofscapes and groups of modest historic buildings, all of which contribute significantly to the character and significance of the Conservation Area and the town's distinctive sense of place.

Consideration could also be given, as part of improved wayfinding and connectivity measures, to enhancing King's Lynn's network of historic alleys, lanes and passages. These routes form an important part of the town's historic urban morphology and contribute significantly to its character and legibility. Improvements to surfacing, lighting, interpretation and decluttering could enhance permeability, support Rail to River initiatives, improve accessibility and visitor experience, and reinforce local distinctiveness.

3.2.1-3.2.4 Cultural Vitality and Adaptive Re-use
We are pleased to see that our recent publication *Heritage Works For Creative Businesses* has been included as a resource for future consideration.

We welcome the principles of this section and the ongoing commitment to reactivating historic buildings and utilising heritage assets for local buildings. The benefits of bringing historic buildings and spaces back into active use extend beyond the conservation of historic fabric and can support town centre vitality, business growth, housing delivery, cultural activity and community wellbeing.

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The Masterplan could be further strengthened by identifying priority heritage assets and sites where intervention would deliver the greatest regenerative impact. This would help focus investment, partnership working and delivery efforts over the lifetime of the plan, ensuring that heritage continues to play a central role in the regeneration of King's Lynn.

As with our previous comment, the inclusion of the term 'sympathetic' within section 3.2.2 would be consistent with the approach set out in paragraph 135(c) of the National Planning Policy Framework.

We recommend that, if this has not already been undertaken, engagement is carried out with VisitEngland as part of the development of any heritage marketing and interpretation strategy.

Strategy 4: Harness Natural Assets
We welcome Strategy 4 and the recognition of natural assets as an important component of King's Lynn's future resilience and attractiveness. In King's Lynn, the relationship between the historic town, the river, watercourses, marshland landscape and port activity has been fundamental to the town's development and identity.

We therefore welcome principle 4.1.5, "Apply heritage-sensitive greening to key historic locations", and encourage a broader approach whereby greening, biodiversity enhancement, flood adaptation and sustainable drainage measures are informed by an understanding of historic character and significance.

Particular care should be taken to ensure that landscape interventions conserve important views, skylines, areas of historic openness and the relationship between the town and its waterfront. Well-designed environmental improvements also present opportunities to reveal and interpret aspects of King's Lynn's historic landscape and maritime heritage whilst delivering wider climate resilience and biodiversity benefits.

Strategy 5: Transport and Access
We welcome many of the proposals set out within this strategy and support the recognition that movement, accessibility and public realm are fundamental components of successful place-making. In a historic town such as King's Lynn, transport interventions have the potential not only to improve connectivity but also to enhance the setting, appreciation and long-term conservation of heritage assets through the reduction of traffic dominance, visual clutter and environmental impacts.

We recommend that some of the more technical terms, such as 'bus hublets', are clearly defined to help explain the nature and purpose of the proposals to a wider audience.

We welcome the commitment to phased delivery, with improvements to public transport and active travel infrastructure preceding any significant reduction in central parking provision. This approach will be important to ensuring that changes to movement patterns are supported by appropriate alternatives and can be successfully integrated into the wider transport network.

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We welcome the Masterplan's aim to improve cycling infrastructure in King's Lynn. Increases in cycling and the associated reduction in private vehicle use can have positive effects on the historic environment through reduced noise, congestion, air pollution and visual clutter. Airborne pollutants can contribute to the deterioration of historic buildings and structures, whilst traffic noise and the dominance of vehicles can adversely affect how historic places are experienced and understood.

Improvements to walking, wheeling and cycling infrastructure also present opportunities to improve access to and appreciation of the historic environment. Encouraging people to experience King's Lynn at a more human scale and support greater engagement with its historic streets, waterfront and public spaces.

In line with national policy and guidance on planning and design, active travel interventions should be designed to protect and enhance the historic environment. The success of such interventions will depend not only on their functionality but also on the quality of their integration within the historic environment. Consideration should therefore be given to materials, surfacing, lighting, street furniture and boundary treatments, particularly within the Conservation Area and around designated heritage assets.

Historic England's guidance *Streets for All* and *Transport and the Historic Environment* provides useful principles which could help inform the detailed design of future interventions.

We recommend that the Masterplan explicitly recognises the need for active travel infrastructure to conserve and enhance the historic environment and produces examples of how this can be achieved in practice.

We welcome reference to the provision of Electric Vehicle charging infrastructure across King's Lynn. We recommend that the Masterplan also recognises the importance of high-quality design and public realm considerations in relation to EV charging infrastructure, particularly within conservation areas and in the vicinity of listed buildings, scheduled monuments, registered parks and gardens and their setting.

Consideration should also be given to the development of a coordinated wayfinding strategy which helps residents and visitors navigate between transport hubs, the riverfront, the historic core and key heritage destinations. Such an approach could improve legibility, support sustainable movement and encourage greater appreciation of King's Lynn's historic environment.

Figure 23 on page 37 would benefit from further clarification. Whilst the principal bus route is shown by the thicker turquoise line, it is unclear what the narrow turquoise lines represent. If these are also intended to indicate bus routes or related movement corridors, this should be made clear within the figure and accommodating key.

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Page 38: We welcome the ambition to rationalise parking provision where this can improve the quality of the public realm, enhance the setting of heritage assets and release land for alternative uses in strategically important locations, including Tuesday Market Place and the Minster. The successful implementation of this approach will, however, depend upon ensuring that alternative transport options are delivered in advance and that any relocated parking is carefully integrated within the wider movement strategy for the town.

Strategy 6: Built Form and Public Realm
We welcome the inclusion of a dedicated strategy for Built Form, Public Realm and Wayfinding. The quality of future development and public realm interventions will be fundamental to the success of the Masterplan and its ability to deliver growth whilst conserving and enhancing the character and significance of King's Lynn's historic environment.

As noted elsewhere in this response, we consider that the Masterplan would be strengthened through the preparation of design codes or equivalent design guidance for key opportunity areas and heritage-sensitive locations. In the absence of such guidance, consideration should be given to strengthening this strategy through more explicit reference to urban grain, roofscapes, material palettes, building proportions and other elements which contribute to local character and distinctiveness.

Future development should also have regard to important views, landmark buildings and the distinctive roofscape of King's Lynn, all of which contribute significantly to the character and significance of the Conservation Area and help define the town's identity.

Urban Form
We welcome the emphasis on responding to historic plot patterns and townscape character. In relation to section 6.1.3, we suggest that reference is made not only to historic plot rhythm but also to the urban grain, recognising the important contribution that plot subdivision, building form and the relationship between buildings and streets make to the character of King's Lynn.

We are pleased to see the inclusion of 'human scale design' within section 6.2.1 and suggest that this principle could usefully be embedded more broadly throughout the Urban Form strategy. This will be particularly important in ensuring that new development responds positively to the fine-grained character of the historic town and creates attractive, legible and accessible environments.

Public Realm and Wayfinding
We support the principles set out within section 6.2.3. The success of public realm interventions will depend upon a clear understanding of historic character and significance, the appropriateness of proposed interventions within their specific context, and the need of local communities and users. These considerations should be viewed as complementary and mutually reinforcing.

We would also welcome explicit reference to decluttering as a simple yet often highly effective means of improving the quality and legibility of the public realm, particularly within the

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Conservation Area and around designated heritage assets. The removal or rationalisation of unnecessary signage, street furniture and other visual clutter can often enhance appreciation of historic places with relatively limited intervention.

Wayfinding measures should similarly be carefully integrated within the historic environment and designed to reinforce local character whilst improving navigation and accessibility. Consideration should be given to ensuring that wayfinding, interpretation and public realm enhancements form part of a coordinated approach rather than being deliberated as isolated interventions.

Illustrative Masterplan – Indicative drawings and Design Codes
A recurring theme throughout the Masterplan is the importance of high-quality design in delivering successful growth and placemaking outcomes. Whilst the document establishes a clear vision, there remains limited guidance as to how proposals will consistently respond to local character, heritage significance, townscape and landscape context.

We therefore recommend that the Council commits to the preparation of design codes, or equivalent design guidance, for key opportunity areas and heritage-sensitive locations (for example Church Street, Southgate, Boal Quay). This would provide greater certainty for decision-makers, developers and the community regarding appropriate forms of development and would help ensure that future proposals deliver the ambitions of the Masterplan.

Such guidance should address, where appropriate:

- Building heights and massing;
- Plot grain and urban form;
- Roofscape character;
- Material palettes;
- Active frontage requirements;
- Public realm treatments;
- Flood adaptation measures; and
- The protection of important views and heritage assets.

This will be particularly important in riverside locations and areas where substantial change is proposed within or adjacent to the Conservation Area.

Key Opportunity Sites
Since our previous engagement through pre-consultation discussions and earlier consultation stages, we note that a number of additional sites, buildings, public spaces and areas of land have been incorporated into the Masterplan.

Given the strategic nature of the document and the level of information currently available for many of the opportunity sites, our comments are focused on those locations where we are presently able to provide meaningful site-specific advice. The absence of detailed comment on

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a particular site should not be interpreted as endorsement of the proposals shown, nor as an indication that Historic England would not wish to provide further advice as proposals evolve.

We also note that Historic England has previously provided detailed advice on several of the sites identified within the Masterplan and would encourage reference to this advice where relevant. In principle, development may be appropriate in many of these locations; however, without further information regarding layout, scale, height, massing, architectural approach and potential impacts on heritage significance, we are unable to offer more detailed comments at this stage.

We would welcome the opportunity to engage further as proposals progress and additional information becomes available.

Riverfront (South Quay)
We support the ambition to remove car parking along South Quay and improve the public realm along the riverfront. Currently, it is car dominated and a visually cluttered route which detracts from the Conservation Area. Increasing and improving how this is experienced is a positive ambition.

The success of this scheme will be in the detailed designs which should cover materiality, appropriate landscaping and planting choices, street furniture, community engagement and maintaining and enhancing key views and lines of sight along the riverfront.

We would welcome further engagement on this project as and when proposals progress.

King's Staithe
In principle, we support the ambition to improve the space at King's Staithe which offers great potential as an area the community and local businesses can enjoy. We note the plan proposes the introduction of greening and planting to create an improved public space.

Having reviewed the plans, we would recommend that careful consideration is given to the landscape strategy as the current concept appears to introduce a significant amount of planting into an area which historically has not. It is, a visually busy proposal and future plans will need to clearly demonstrate an understanding of how this approach would respond to and enhance the historic space.

We would also recommend that to avoid creating a generic space, consideration should be given to how layout of paths, seating, planting and event space can better reflect the character of the townscape and busy quayside that came before.

Based upon the latest images the proposed shared surface lacks sufficient delineation of the road (which is required for access) and pedestrian surfaces. This would require further refinement to ensure King's Staithe balances being successful and enjoyable with needing to be a safe, legible and easily navigable space.

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Somerfeld and Thomas
We welcome inclusion of the vacant Grade II Somerfeld and Thomas warehouse within the opportunity sites. We support the Council's desire to bring this building (included within last year's Heritage Investment Prospectus) back into use, both in the short to medium-term by exploring flexible and meanwhile uses to support activation of the southern end of the riverfront.

Without further design proposals or elevations, we are unable to provide considered comments on the indicative images at this stage but would reiterate the site lies within the Conservation Area boundary and sits within close proximity to a number of designated assets. Therefore, consideration will need to be given to height, scale, massing, materials, character, context etc.

Devil's Alley
We have provided detailed comments on both the previous proposals for the site and the most recent concepts which feature in the Masterplan. We welcome the simplified approach to creating public realm on this current disused and unattractive parcel of land within the Conservation Area. Improvements to area will, we believe, also support delivery of other strategic aims of the Masterplan, particularly those identified in Strategy 3.

We remain supportive of the approach and are pleased to note that these proposals have been developed alongside the local community.

We would also draw your attention to our previous comments regarding the design of any permanent structure/commercial offer at the entrance to the site.

Boal Quay
Our comments in relation to Boal Quay should be read alongside our previous advice. We continue to welcome the way in which the surrounding historic environment appears to have informed the indicative building lines and overall site layout.

The creation of a wetland and community space has the potential to deliver significant benefits, both in terms of enhancing biodiversity and strengthening connections between the riverfront, the historic core and surrounding neighbourhoods. We also welcome the retention of key views towards the South Quay building line and the Minster, which make an important contribution to the character and significance of the waterfront and wider Conservation Area.

The indicative layout appears to respond positively to the marshland character of the site and the informal arrangement of the surrounding townscape. The proposed development parcels are generally more permeable and grain-sensitive than previous iterations, which has the potential to create a more legible and integrated extension to the town.

We would, however, echo comments made during previous stakeholder engagement that the success of this site will ultimately depend upon the quality of its detailed design. Particular regard should be given to the relationship between new development, the riverside setting, long-distance views and the historic environment. The proposed gable-fronted forms visible on

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approach could become successful townscape features, but will require careful attention to scale, proportions, materiality and architectural detailing to ensure that they respond positively to local character and do not appear overly dominant.

A wayfinding and interpretation strategy should also be considered to help visitors understand the relationship between the wetland, the waterfront and King's Lynn's historic core.

Greenland Fishery

We reiterate our earlier advice that, whilst there are positive aspects to creating a stronger building line along Harding's Way, the illustrative material currently presented raises concerns regarding scale, massing and proximity to the Grade II* Greenland Fishery.

The Greenland Fishery is one of King's Lynn's most significant surviving maritime and industrial heritage assets. Any future development in its vicinity should be informed by a detailed understanding of its significance, including its historic relationship with the river, its prominence within wider views of the waterfront, and the contribution made by the openness of land immediately surrounding the building to its setting.

We recommend that a greater undeveloped buffer is retained around the Greenland Fishery, particularly to the rear and northern side of the building, to avoid visual encroachment upon its setting. Future proposals should also preserve key views towards the distinctive gabled elevation from the north and northwest, which contributes positively to the appreciation and legibility of the building within the wider townscape.

Consideration should also be given to maintaining the building's visual and spatial relationship with the river. New development should not sever or substantially diminish this historic association and should instead seek opportunities to reveal, interpret and reinforce the site's maritime significance. This would assist in conserving and enhancing the significance of both the listed building and the King's Lynn Conservation Area.

Given the sensitivity of this location, future proposals should be supported by detailed townscape, heritage and visual analysis to demonstrate how the scale, massing, layout and public realm treatment respond positively to the significance of the heritage assets affected.

Public Realm, Movement and Food Infrastructure

The success of the proposed walk/wheel route and associated public spaces will be strongly influenced by the quality of the surrounding built form and public realm. Particular attention should be given to appropriate building scale, material palettes, roofscape design and active frontages to ensure that routes feel attractive, safe and well-integrated with surrounding development.

We also support measures which improve connectivity through the site and encourage greater movement between the waterfront, surrounding neighbourhoods and the historic town centre. Consideration should be given to how the wider movement network, including Harding's Way, functions alongside these ambitions.

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A clear architectural and landscape strategy will be required for any flood defence measures to ensure that they are successfully integrated with the public realm, contribute positively to local character and avoid creating inactive or visually intrusive edges along key routes and spaces.

Common Staithe Quay
We have previously provided written advice on this site and have highlighted the importance of balancing new development with its historic use, layout and surrounding heritage assets i.e. The Pilots Office and Bath House. In principle, we consider there is scope for this site to accommodate new development but would reiterate the site's sensitivity and need for development to avoid impact upon on key views and the setting of designated assets.

There is strong opportunity here to draw on the surrounding built form to create development which complements the existing historic environment and key views.

St James' Swimming Pool
We note the proposal for development on the site of St. James' Swimming Pool for mixed use and residential. Development on this site will need to consider how it enhances and draws from the character of the townscape. We would expect any plans for this site to consider its relationship to the Conservation Area and The Walks Registered Park and Garden.

Debenhams
We strongly support the inclusion of the former Debenham's building as key opportunity site within the town centre, which we see as a critical building for the Council and its stakeholders to focus attention on. This vacant site presents an opportunity to bring a large building back into use in a prominent location on the southern end of the high street, which presently does not enjoy the same level as footfall as other areas, which would also support Neighbourhood Board objectives.

We would support options on this site which would balance active frontages and mix of commercial and residential use across the entire site. There is also potential here for development of this site to restitch the town and encourage easier movement from the High Street to Tower Street.

Whilst not a listed building, it its identified as a Non-Designated Heritage Asset and historic images are available to inform future design and use. We therefore welcome an approach of adaptive reuse, and retention of remaining internal features as highlighted within the Design Principle on p.69.
Given the prominence of this site, we would be keen to work with you to help bring the site forward and welcome engagement at the pre application stage.

Port Area and Timber Yard
We note the inclusion of the Port Area and Timber Yard within the Masterplan and recognise the opportunities this site presents for economic growth, employment provision and business innovation.

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We also welcome the potential role the site could play in supporting wider town centre objectives, including the rationalisation of parking provision within the historic core and the release of more sensitive sites for alternative uses and public realm improvements.

The area also presents an opportunity to celebrate and reinforce King's Lynn's maritime and industrial heritage. As one of the defining influences on the town's historic development and identity, the working waterfront should continue to inform future proposals for the site. Consideration should therefore be given to how the layout, architecture, materials, public realm and interpretation strategy can respond positively to the area's industrial and maritime character.

Whilst detailed proposals are not currently available, it will be important that future development avoids generic business park typologies and instead seeks to create a distinctive place which draws upon the site's historic function and relationship with the port. This would help strengthen local character, reinforce King's Lynn's unique identity and contribute positively to the wider ambitions of the Masterplan.

We particularly welcome opportunities to retain and express the site’s continuing association with port activity and industry, recognising that living and working heritage can make an important contribution to local character and authenticity.

West Lynn
We note inclusion of West Lynn within the plan. We note the opportunity the site(s) present in creating a strong tourism offer, residential units, and public realm and green space. We also note there is also an opportunity with this site to enhance how the water, riverfront, skyline and key views are experienced, whilst also offering potential to improve the connections between West Lynn and the town.

Land North of Wisbech Road
Whilst we have not previously provided detailed advice on this site, its location adjacent to both the Boal Quay and Southgate opportunity areas means that its future development has the potential to play an important role in shaping the southern approach to King’s Lynn and connecting several major regeneration projects.

The Masterplan would benefit from further explanation of the intended role of this site and how it contributes to the wider objectives for movement, townscape and regeneration. In particular, consideration should be given to how development of the site can help create stronger physical and visual connections between the Boal Quay, Southgate and wider town centre areas, avoiding the creation of disconnected or vehicle-dominated spaces.

Given the site’s strategic location, consideration should also be given to whether the proposed density and land uses represent the most effective use of land and whether opportunities exist to support a more active and urban form of development that contributes positively to the character of the area and surrounding public realm.

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The rationale for the proposed public car parking provision is not currently clear from the Masterplan and would benefit from further explanation, particularly in the context of the wider ambition to rationalise parking provision elsewhere within the town centre. Future proposals should demonstrate how parking arrangements support, rather than undermine, wider regeneration, movement and placemaking objectives.

Particular attention should be given to the relationship between this site and nearby heritage assets, including views towards the Southgate area and the transition between the historic town and the emerging waterfront neighbourhood at Boal Quay.

Church Street
We reaffirm our support for sensitive and well-considered redevelopment at Church Street, which represents one of the most significant opportunities within the Masterplan area to repair the urban fabric, reinforce the historic townscape and create a more attractive setting for nearby heritage assets, including the Minster. The site has the potential not only to accommodate development in a highly sustainable central location, but also to re-establish lost urban grain and strengthen connections between the historic core and surrounding areas.

We recognise the challenges associated with bringing this site forward and understand its identification as a longer-term opportunity. Should comprehensive redevelopment not be achievable in the short to medium term, we would welcome interim measures which improve the appearance, surface treatment and overall quality of the existing car park, helping to enhance first impressions for residents and visitors alike.

As we have previously advised, Church Street occupies a highly sensitive location within the Conservation Area and adjacent to important heritage assets. The success of any future development will therefore depend upon a thorough understanding of the site's historic context and the delivery of high-quality design which responds positively to local character, townscape and significance.

We continue to support the broad principles established through earlier concepts for the site, particularly the use of townhouse typologies, active frontages and a fine-grained pattern of development. Such an approach has the potential to deliver an appropriate balance between density and human-scale design whilst reinforcing the character and enclosure traditionally associated with this part of King's Lynn.

Active frontages will be particularly important in ensuring natural surveillance of streets and public spaces, supporting vitality and encouraging movement through the site. We also continue to support opportunities for carefully considered corner buildings or landmark features where these help define key junctions and routes.
However, any increase in scale should be carefully managed to ensure that building height and massing remain subordinate to the wider objective of re-establishing a coherent and legible townscape and preserving the setting of nearby heritage assets, particularly the Minster.

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The indicative material currently included within the Masterplan does not provide sufficient information to determine whether previous advice relating to building heights, roof forms, architectural character and massing has been incorporated into the emerging proposals. We therefore recommend that future work on the site is supported by a site-specific design code, or equivalent design guidance, addressing matters including:

- Building heights and massing;
- Urban grain and plot subdivision;
- Frontage types and active uses;
- Material palettes and architectural detailing;
- Roofscape and roofline treatments; and
- Key views and the setting of nearby heritage assets.

The rationale for the proposed break within the frontage is not currently clear and we question whether it is necessary. Further explanation should be provided regarding its intended townscape function and how it contributes positively to local character, permeability, legibility or the setting of nearby heritage assets.

Given the significance and prominence of this site, we would be keen to work with you to help bring the site forward and welcome engagement at the pre application stage.

Southgate
We welcome the continued inclusion of Southgate within the Masterplan and remain strongly supportive of the principle of comprehensive regeneration in this location. As one of King's Lynn's most important gateway sites, Southgate presents a rare opportunity to deliver coordinated improvements to transport infrastructure, public realm and the historic environment through a single strategic project.

The South Gate is one of the town's most significant heritage assets, designated as both a Grade I listed building and scheduled monument. Despite its exceptional significance, its setting and appreciation continue to be adversely affected by the volume and configuration of modern traffic infrastructure. We therefore continue to support the long-established objective of removing general vehicular traffic from the South Gate itself and improving its surrounding public realm, subject to the delivery of a high-quality and heritage-led design solution.

Whilst we recognise that the detailed proposals may continue to evolve, it will be important that the final Masterplan retains a clear commitment to the strategic objectives established through the adopted Southgate vision and previous masterplan work.

As proposals progress, it will be important that public realm improvements, movement infrastructure and development plots are brought forward through a coordinated design approach which places the significance of the South Gate and its setting at the heart of decision making.

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Given the significance and prominence of this site, we would be keen to continue to work with you and welcome further engagement at the pre application stage.

Tuesday Market Place and Saturday Market Place
We note the inclusion of Tuesday and Saturday Market Place within the Masterplan and support, in principle, efforts to reduce the dominance of vehicle parking within these spaces and enhance their role as key civic and public spaces within the historic core of the town. The marketplaces are among King's Lynn's most important historic public spaces and make a substantial contribution to the character and significance of the Conservation Area. Their historic function as centres of commerce, social and civic activity remains fundamental to their significance and should continue to inform future proposals.

Whilst insufficient detail is currently available to enable detailed comment, we encourage any future proposals to be informed by a clear understanding of the historic evolution and significance of these spaces. Interventions should seek to reveal and reinforce their historic character and spatial qualities, avoiding an overly engineered or prescriptive approach that could diminish their openness, flexibility and distinctive sense of place.

Consideration should also be given to ensuring that these spaces retain the flexibility necessary to accommodate markets, events, gatherings and other civic activities which contribute to their ongoing vitality and reflect their historic function within the town. Future proposals should also carefully consider views towards surrounding heritage assets and opportunities to enhance appreciation of the historic townscape.

Kwik Fit
We welcome the inclusion of this site within the opportunity areas identified by the Masterplan and support efforts to secure the long-term conservation and viable use of this designated heritage asset. Bringing the building back into active and sustainable use should be a key objective, recognising the contribution that occupied and well-maintained historic buildings make to the vitality and character of the town centre.

Whilst residential use may form part of an appropriate solution, we would caution against prematurely limiting the future potential of the site to a single use. Given the building's location, plan form, fenestration and relationship with St James's Street, there may be opportunities for commercial, creative, cultural or mixed-use activities which could better sustain the building's significance whilst contributing to wider town centre objectives.

Consistent with paragraph 210(a) of the National Planning Policy Framework, future proposals should seek to secure a viable use that is consistent with the conservation of the asset and its significance. We therefore suggest that the Masterplan retains sufficient flexibility to allow a range of uses to be explored as proposals progress.

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Recommendations
As the Masterplan progresses from vision to delivery, it will be important that sufficient guidance and safeguards are in place to ensure that future change conserves and enhances the significance of King's Lynn's historic environment. We therefore recommend that consideration is given to the following:

- Prepare design codes or equivalent guidance for key opportunity sites;
- Develop a strategy for bringing priority historic buildings back into viable use;
- Identify and protect key views, skylines and landmark buildings through future planning guidance;
- Ensure future development around Greenland Fishery conserves its setting, key views and historic relationship with the river;
- Undertake detailed heritage impact assessments for major riverside redevelopment sites;
- Ensure future flood defence measures are integrated with public realm and heritage objectives;
- Landscape strategy for Riverfront and King's Staithe to consider how its historic use and layout can inform positive public realm choices;
- Strategic objectives within Urban Form and Public could be strengthened;
- Reference to made for high quality design and good practice in relation to the public realm for EV charging;
- Reference the need for cycling interventions to protect and enhance the environment and should give specific examples of how this might be achieved;
  Inclusion of Glossary and/or defining technical language;
- Continue engagement with Historic England as individual opportunity sites progress.

Summary
We welcome the production of this Masterplan and are pleased to have been engaged as a Stakeholder an early stage and comment upon this latest version which pulls together numerous strands with heritage as key driver for positive change in King's Lynn.

We have a made numerous comments on each section of the Masterplan which we hope you will find useful as you refine your strategy. We have also made a number of recommendations for you to consider.

We remain keen to work closely with you on priority buildings and interventions to offer advice and guidance on best practice on how these short, medium and long-term objectives can be supported and delivered.

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Please do contact me, either via email or the number above, if you have any queries.

Yours faithfully,

[redacted]
Historic Places Adviser, East of England
[redacted]

[redacted]
Inspector of Historic Buildings and Areas, East of England
[redacted]

cc [redacted], Team Leader, Development Advice

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Your Ref:	Kings Lynn Master Plan	My Ref:	FW2026_0385
Date:	28 May 2026	Tel No.:	0344 800 8020
		Email:	llfa@norfolk.gov.uk

Case Officer: [redacted] *Strategic Flood Risk Planning Officer*
Reviewed by: [redacted] *Senior Flood Risk Officer*

Dear Sir / Madam,

Kings Lynn Masterplan – LLFA Review Masterplan

Thank you for your consultation on the above site, received on 11 May 2026. The LLFA has reviewed the submitted information and wish to make the following comments:

The masterplan might need to be updated to better reflect the revised devolution timescales.

We note that the Kings Lynn Surface water management plan (SWMP) has not been considered as part of the site specific studies on Page 11. The LLFA requests clarification on why the SWMP was not included as a source of information. **Further clarification is required.**

On page 33, there is reference to the upgrading of drainage systems to SuDS. The LLFA is supportive of the inclusion of SuDS. Although it is not clear this this time where these SuDS upgrades are proposed or whether they are solely in the within the public realm or just supported as part of the major developments proposed to come forward. Furthermore the location of some SuDS could have limited opportunities in high and medium flood risk areas. **Further information is required.**

On page 34, for Strategy 4: Harness Natural Assets, the LLFA notes the phrase "green surface car parking areas". However, on the previous page (page 33) there is no reference to this type of development or what it means. **Further information is required.**

The LLFA notes there is some inconsistency in what is being proposed in West Lynn. On all the information prior to the Illustrative Masterplan the West Lynn areas is indicated as an environmental space with only once mentioning of housing potentially at the back of the site. However, once in the illustrative masterplan, West Lynn shows a number of private ownership residential properties and a new sports complex with a substantially reduced area as green open space. The LLFA notes that these residential properties are within an area of high fluvial / tidal flood risk. **Further work is appropriate to ensure there is consistency in the masterplan.**

The LLFA notes that some of the developments are proposed are within areas of flood risk. Some of these development sites are “more vulnerable uses”, such as the residential developments. The Masterplan also acknowledges that in the future the whole study area will be at risk of flooding. It is not clear to the LLFA whether the sequential tests and exception test have been applied and how these have been passed. It is possible that some of the proposed housing sites may not be suitable for new housing and an alternative plan should be considered and held in reserve. **Further information will be necessary.**

The LLFA notes that in the Design principles for the opportunity site, the inclusion of SuDs is not always identified yet on page 33 and 34 there was a clear commitment for the inclusion of SuDs. The LLFA seeks greater and more consistent commitment to the inclusion of SuDS in the masterplan including both in the proposed development areas and in the proposed public realm improvements. This is in order to manage the existing surface water flood risk across the central area of Kings Lynn. **Further work and information is required to improve the commitment.**

The LLFA notes that the Church Street Car Park site has no information on the Harness Natural Assets in the Design Principles. This is inconsistent with the opportunity where public open space and then inclusion of trees is incorporated into the indicative plan shown. Furthermore, there are no Design Principles for the proposed Southgates Regeneration Area. **Further work and information is required.**

Further guidance on the information required by the LLFA from applicants can be found at https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers.

Yours sincerely,

[redacted]
Strategic Flood Risk Planning Officer

On behalf of Norfolk County Council as Lead Local Flood Authority

Disclaimer
We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue.

NHS
Norfolk and Suffolk
Integrated Care Board

Our Ref: King's Lynn Masterplan
12 June 2026

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Dear Sir / Madam,

King's Lynn Masterplan: Health and Infrastructure Implications

Introduction

The NHS 10 Year Plan published in July 2025 is a plan for transformation, moving from a reactive system to one that is more proactive, community-based, digitally enabled, and prevention-focused. The plan recognises significant challenges around workforce, integration, and financial sustainability, but sets out a comprehensive roadmap for reforming infrastructure services.

The 10-year plan will see a redesign of the NHS model of care and will focus on three shifts

- **Hospital to community** (also known as left shift of care, moving acute services into the community for improved access and care closer to home).
- **Analogue to digital** (the NHS App will essentially become the front door the health services, although consideration needs to be given around digital inclusion).
- **Sickness to Prevention** (more focus on preventing illnesses including population health strategies).

Given these considerations, greater attention will be directed toward primary care and general practice, community accessibility, and digital models of care. Neighbourhood health centres have recently been promoted as an approach to facilitate these objectives.

Strategic Context

The draft King's Lynn Masterplan proposes around 741 new homes across 24 sites around the town centre and regeneration areas. Some of these dwellings already have planning consent,

including elements of the Former Post Office and Hillington Square Phase 6. However, most of the proposed housing remains as new proposals and would be brought forward through future planning applications and phased regeneration.

Site Name	Houses Planned	With Consent	New Proposals
Boal Quay	160	0	160
Common Staithe Quay	12	0	12
St James Swimming Pool	59	0	59
Former Debenhams	70	5 (expires June 2026)	65
Land North of Wisbech Road	56	0	56
Church Street Car Park	73	0	73
Southgate's Regeneration Area	92	0	92
Former Post Office	34	34	0
Hillington Square Phase 6	65	65	0
Chapel Street Car Park	19	0	19
Juniper, Austin & Albert St Car Parks	67	0	67
St James Street Kwik Fit	21	0	21
West Lynn	13	0	13

The table above shows that of the 741 proposed dwellings which fall within the Masterplan boundary, 104 have either existing consent, have completed already or are under construction. This leaves a further 637 dwellings as new proposals.

The ICB supports the principle of regeneration areas, mixed-use development and housing, where these are planned alongside the health and care infrastructure needed to serve both the existing and future demand from communities. Early engagement with the ICB will be important to ensure health infrastructure requirements are considered at the same time as transport improvements, public realm investment and funding opportunities.

Healthcare Estate Infrastructure Implications

The proposed level of housing growth will see an increase in the local population of circa 1,360 residents, in terms of a net gain in population (allowing for movement in and out of the area), therefore the demand on healthcare services and associated estate infrastructure will increase.

The ICB is undertaking further work to develop and refine our Place-based and Neighbourhood strategies, including a fuller understanding of future service models and estate requirements across Norfolk and Suffolk, including in King's Lynn. Our planning and associated service strategies will provide a clearer framework against which opportunities and infrastructure requirements can be identified and aligned to the NHS 10-Year Plan and it's three key shifts.

Further consideration should be given to constraints affecting future planning and delivery. Several proposed sites may be affected by flood risk and challenging ground conditions, which could influence their suitability, cost and accessibility. Emergency access, continuity of care, inclusive transport routes and climate resilience should therefore be considered as site proposals are developed.

Wider Determinants of Health

Not only does the masterplan have the potential to support healthcare infrastructure but also improved health outcomes. The enhancements to green infrastructure, public realm and open spaces could help to support physical activity, mental wellbeing, biodiversity, social interaction and improved environment.

The emphasis of the plan on improved active travel, walking, cycling and public transport through the town centre, riverfront, West Lynn and regeneration areas could help to reduce car dependency (encouraging exercise), improved air quality and support a more equitable access to healthcare eservices. Any improvement and benefit to active travel routes should be maximised by ensuring they are safe, accessible (dementia friendly), direct and suitable for people with mobility needs. The ICB would also encourage enhanced wayfinding along these routes specifically for healthcare services.

The regeneration of areas across the town could have potential positive health related opportunities, such as community sports and leisure. Other uses such as cultural and the reuse of heritage buildings and sites can help the local identity and improve social cohesion, this can help to benefit people's mental wellbeing. It should however be noted that regeneration does also come with risks, specifically around affordability, displacement, accessibility and the continuity of services if they are not managed appropriately, this strengthens the need to collaborate with the ICB at the earliest opportunity.

In regard to new dwellings, the ICB would expect these to consider the wider determinants of health also. Designing new homes to the M4(2) 'accessible and adaptable' standard or higher helps to ensure that properties can meet residents changing needs throughout their lives, supporting older people, families, disabled residents and those with temporary mobility needs. These standards require step free entrances, wider doorways, adaptable bathrooms and circulation spaces making homes safer, more inclusive and easier to modify without costly structural changes. This approach supports independent living, reduces the risk of falls and avoidable healthcare appointments and hospital admissions:

- **Adaptable**: designed to support future changes such as grab rails, stairlifts, and bathroom adaptations.
- **Inclusive**: step-free access and wider circulation spaces improve usability for a wide range of residents.
- **Preventative**: safer homes can reduce falls, support independence, and lessen pressure on health and social care services.

Further to the above new dwellings should be designed to prevent damp and mould and to maintain stable indoor temperatures through effective insulation and ventilation. This can help reduce the risk of respiratory illness, cardiovascular stress and associated demand on primary care, acute services and ambulance conveyances, particularly among vulnerable groups such as older residents. Preventing damp and mould can also support mental wellbeing by reducing anxiety and depression linked to poor housing conditions.

Ongoing engagement between the local authority, public health and the ICB will be required.

Key Risks for further Consideration

- Population growth from new housing will increase demand and place more pressure on health services and infrastructure.
- Flood risk should be a key consideration to site planning, estate design, emergency access, health and wellbeing, and continuity of care.
- Active travel and public transport improvements will be required and should be designed in a way to be inclusive so that communities experiencing disadvantage can benefit from improved access. Routes should be planned to support ease of access to and from healthcare services and facilities.
- Regeneration should be supported by appropriate affordable housing and monitoring to avoid worsening inequalities or displacement pressures in the most deprived areas of King's Lynn.

Conclusion

- Norfolk and Suffolk Integrated care Board (NSICB) supports the overall ambitions of the Masterplan, particularly where this improves housing quality, active travel, green infrastructure and access to community facilities including healthcare.
- NSICB would like to request early and ongoing engagement as site proposals, delivery phasing and funding mechanisms are developed. This will ensure health infrastructure requirements can be considered alongside housing growth.
- Major opportunity sites should be supported by health impact assessments and collaboration with the ICB to identify impacts on healthcare infrastructure capacity, accessibility and inequalities.
- Active travel (walking and cycling) and public transport proposals should connect effectively to the current and potential future health and care facilities across the town, with inclusive design fixed from the start.
- NSICB would welcome discussions with the local planning authority at an early stage to ensure health infrastructure needs are considered from the outset. The ICB is aware that a new local plan is in the pipeline and is committed to working with local authority partners to identify appropriate solutions and ensure the future residents are well supported in accessing health and care services.

Yours faithfully,
NHS Norfolk & Suffolk ICB – Estates and Sustainability