

## Draft Policy LP32- Community and Culture Policy

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542893065577#section-s1542893065577>

Summary of Comments & Suggested Response:

Consideration of issues:

- Most comments are in support of the policy
- A majority of comments suggest rewording and adding detail/ robust evidence to examples of local distinctiveness, key facilities being protected and how cultural facilities will be assessed in relation to proposals
- Welcome the protection of recreational facilities, rich cultural heritage and enhancing existing cultural assets

Policy Recommendation:

- 7.9.3- Updated information on the IMDs and footnotes
- **7.9.4 Updated information on health**
- **7.9.5 Updated information on deprivation and crime**
- **7.9.6 Updated information on population estimates**
- **Added relevant guidance**
- **New clause '3f' in LP32 in reference to climate change and health and wellbeing**

## LP32 Community and Culture Policy

### Introduction

7.9.1 Planning is about more than just physical land use. It is essential that planning policy aims to improve the wellbeing of local communities by tackling social issues and creating the right conditions for people to have a good quality of life. The first part of this chapter examines the key social issues which are affecting communities in the borough, while the second part identifies the significance of culture to the community.

7.9.2 A socially and culturally sustainable community means that it is active, inclusive and safe – fair, tolerant and cohesive with a strong local culture and other shared community activities. In order to achieve this goal, policies in the Local Plan must address the following key issues:

- **Inequality** - the difference between the most and least deprived wards in the borough.
- **Health** - encouraging more healthy and active lifestyles.
- **Crime** - reducing the fear of crime as well as actual incidents of crime to ensure people feel safe.
- **Community Cohesion** - community cohesion is achieved when:
  - a. there is a common vision and a sense of belonging for all communities;
  - b. the diversity of people's different backgrounds and circumstances are appreciated and positively valued;
  - c. those from different backgrounds have similar life opportunities;
  - d. strong and positive relationships are being developed between people from different backgrounds in the workplace, in schools and within neighbourhoods.

7.9.3 There are typically seven domains of deprivation which combine the official measure for the Index of Multiple Deprivation (IMD) these are: income, employment, health, crime, barriers to housing and services and living environment<sup>1</sup>. 'Pockets' of deprivation are a key issue for the borough, both in urban areas including King's Lynn and Hunstanton, as well as some of the more rural parts of the district<sup>2</sup>.

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<sup>1</sup> MHCLG (2019) The English Indices of Deprivation (2019) (IoD2019)  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/835115/IoD2019\\_Statistical\\_Release.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835115/IoD2019_Statistical_Release.pdf)

<sup>2</sup> MHCLG (2019) Local Authority Maps- Indices of Deprivation (2019) Available at: <https://imd2019.group.shef.ac.uk/>

The national statistics of English indices of deprivation (2019) relatively ranks each small area (Lower Super Output Area) in England from most deprived (1) to least deprived (32,844). The data for local authorities (2019), highlights that King's Lynn & West Norfolk IMD average score was 94 out of 317 for local authority districts in its average rank for deprivation<sup>3</sup>; making this fall in the top 25% most deprived districts in England. The most deprived domains for the borough was education with an average score of 33 (top 10%) and health scored at 67 alongside housing (top 20%)<sup>4</sup>.

7.9.4 A health profile of the area between 2013-2015 highlighted that the average life expectancy varies by 3 years (for men) and 2 years (for women) between the most deprived wards and the most affluent areas of the borough<sup>5</sup>. Individuals who have good access to public open space including, parks, greens, leisure and sports facilities and other recreation facilities have a better opportunity to have an active and healthy lifestyle.

7.9.5 West Norfolk is fortunate to have one of the lowest crime levels in England ranking at 268 out of 317 making the borough fall within the top 20% least deprived areas in England. Recent statistics (2020) show that the crime rate was 4.8 per 1000 population compared to 6.2 in England. The highest crime rates were anti-social behaviour and violence and sex offences. Anti-social behaviour has stayed at a consistent rate from 2018-2020 of around 1.4 per 1000.<sup>6</sup> One of the main ways in which the planning process can help to reduce the likelihood of crime is to ensure it is a key consideration in the design process, particularly for access routes and public spaces. As highlighted, in the national design guide (2019) well designed places and careful planning can help users feel safe and secure within shared amenity spaces without the need for security measures. This will complement policy on design outlined in Sustainable Development Policy LP16.

7.9.6 West Norfolk is experiencing an increasing mix of people of different nationalities and cultures. Over the past decade parts of King's Lynn and the wider borough have welcomed a significant number of economic migrants, mainly from the A8 accession countries that joined the EU in 2004, particularly from Poland, Lithuania and Latvia. Population estimates by nationality shows in 2018 EU nationals were higher in King's Lynn and West Norfolk (6%) compared to Norfolk (5.1%) and England (5.9%). Broad

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<sup>3</sup> MHCLG (2019) Local Authority District Summaries Available at <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

<sup>4</sup> Norfolk County Council (2018) Norfolk JSNA Briefing Document [https://www.norfolkinsight.org.uk/wp-content/uploads/2019/12/Briefing\\_paper\\_-\\_Deprivation.pdf](https://www.norfolkinsight.org.uk/wp-content/uploads/2019/12/Briefing_paper_-_Deprivation.pdf)

<sup>5</sup> Health and Wellbeing Profile June 2017 King's Lynn & West Norfolk [https://www.norfolkinsight.org.uk/wp-content/uploads/2018/09/Kings\\_Lynn\\_and\\_West\\_Norfolk\\_HWB\\_profile\\_2017.pdf](https://www.norfolkinsight.org.uk/wp-content/uploads/2018/09/Kings_Lynn_and_West_Norfolk_HWB_profile_2017.pdf)

<sup>6</sup> King's Lynn & West Norfolk Crime & Community Safety Area Report (2020) <https://www.norfolkinsight.org.uk/crime-and-community-safety/report/view/c4759afd921045e68237e611043725c2/E07000146>

ethnic groups within the borough show that 97.3% of the population is White, followed by Asian at 1.3% and Black, Mixed and Other falling below 0.9%. This highlights how little diversity is present within the borough overall<sup>7</sup>.

7.9.7 Providing opportunities for the community to work together, either by involving the community early in the design of new development, creating shared community facilities or by supporting different kinds of community groups, sports and activities will help to improve community cohesiveness.

7.9.8 The policy for Community & Culture aims to work alongside wider strategies undertaken by the West Norfolk Partnership and other agencies such as the Norfolk Constabulary as well as charities and community groups to address the social and community issues outlined above. The policy aims to ensure West Norfolk is a great place for people to live and work by creating opportunities for the community to interact, supporting the provision of community facilities and infrastructure and ensuring that future development is designed in a way which helps to avoid the creation of, or increase the amount of social problems experienced by residents in the borough.

### **Relevant Local and National Policies and Guidance**

- LP33 Community Facilities
- LP19 Open Space + 'FIT' Standards
- National Planning Policy Framework: Promoting healthy and safe communities
- National Design Guide (2019)- Public Spaces and Uses

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<sup>7</sup> Norfolk Insight (2020) Population Estimates <https://www.norfolkinsight.org.uk/population/report/view/b15822d80ec54439bb12134b7c857bb9/E07000146/>

## The Cultural Context

7.9.9 Culture is a collective term for a diversity of different activities and attractions. The cultural assets of West Norfolk are considered to include the arts, the natural and built heritage, libraries, museums, archives, galleries, sports and leisure, churches and other places of worship as well as events, concerts and festivals. As culture is so wide ranging, it is strongly linked to policies on the economy and environmental assets.

7.9.10 A Vision of Norfolk 2021 produced in partnership with Norfolk County Council identifies the importance of culture to people in Norfolk:

- building communities, we can be proud of;
- nurturing our growing digital economy;
- making the most of our heritage, culture and environment;
- developing the skills of our people through training and apprenticeships;
- building new homes to help young people get on the housing ladder;
- installing infrastructure first.

7.9.11 West Norfolk is rich in cultural assets and hosts a variety of different events and festivals across the borough each year. Whilst more strategic cultural facilities are focused in the larger settlements such as King's Lynn, Hunstanton and Downham Market, there are many smaller but important tourist and/or cultural facilities throughout the rest of the borough as well as many traditional local events and festivals. The borough is fortunate to be rich in cultural heritage in the built and natural environment. Environmental Assets Policy LP17 and X AONB Policy focuses on protecting and enhancing the rich heritage of the borough such as the many historic Listed Buildings, Conservation Areas, Areas of Outstanding Natural Beauty as well as the distinctive inland waterways which support tourism and recreation.

7.9.12 The Borough Council has already made improvements to significant cultural venues in King's Lynn in recent years and it is essential that cultural facilities are improved and continue to grow in King's Lynn to serve an expanded population.

7.9.13 Cultural facilities can contribute to improving quality of life, reinforcing local distinctiveness, driving regeneration, providing jobs and promoting tourism. For this reason, it is vital that the Community and Culture Policy LP32 aims to protect and promote West Norfolk's existing cultural assets, as well as facilitating new cultural facilities where appropriate. Policy LP32 will prioritise

locating cultural facilities sequentially in accessible locations in the larger settlements, in line with the Settlement Hierarchy Policy LP02 and national planning policy on sustainable development.

## **Strategic Policy**

### **Policy LP32 Community and Culture**

1. Delivering community well-being and enhancing quality of life through good design.
2. Where possible, developers should examine best practice on design in new development and should aim to involve the community early in the design process of new development.
3. The form, design, location and layout of development should enhance community wellbeing, by:
  - a. being accessible and inclusive - ensuring that people of any age, gender, ethnicity and ability can use and access the development;
  - b. being adaptable - creating high quality development which is capable of being modified either for different uses or to suit people with different needs;
  - c. being locally distinctive - contributing to a sense of place and identity;
  - d. reducing the opportunity for crime - considering factors such as natural surveillance, boundaries and security features, lighting and the management of public space to promote safe living environments;
  - e. being within walking distance of open space - to increase people's quality of life and enable active and healthy lifestyles.
  - f. creating places that promote social interaction and health and wellbeing, to allow people who are isolated and more vulnerable to cope with the impacts of climate change

#### **Creating sustainable communities through the provision of community infrastructure.**

3. The Borough Council will:
  - a. support proposals that protect, retain or enhance sports, leisure and recreation facilities including children's playgrounds or create new facilities in accessible locations;
  - b. work with NHS Norfolk to ensure that new health facilities are provided to serve an expanded population, particularly in growth areas in King's Lynn.
4. The Borough Council recognises the importance of community facilities and services (also referred to as community

infrastructure) to improving people's quality of life, reducing inequality and improving community cohesion. The Council will, working with partners, seek opportunities to gain funding for the development of community infrastructure, particularly in deprived parts of the borough (see Policy LP05).

### **Protecting, enhancing and promoting cultural facilities**

5. The Borough Council will seek to protect and enhance existing cultural assets. If a cultural facility is no longer viable and the Council cannot secure funding, the Council will seek to explore alternative options such as co-locating multiple facilities on a single site to prevent the loss of cultural facilities and to increase the economic viability of such facilities.
6. Development will not be permitted in cases where it would result in a loss of existing cultural facilities, unless equivalent new or improved facilities, where need justifies, can be provided within the same settlement boundary or in close proximity of the existing facility.
7. New cultural facilities will actively be encouraged by the Borough Council, providing they are compatible with their location and setting and do not conflict with Economy Policy LP06. New cultural facilities will be located sequentially, in accessible sites in King's Lynn and the Main Towns of Hunstanton and Downham Market. Cultural facilities proposed in accessible locations in Key Rural Service Centres or the more rural settlements and areas will be considered based on localised impacts.

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**Policy LP32 contributes to Strategic Objectives 1, 2, 5 Economy; 6, 7, 8, 10; Society; 12, 14, 15 Environment.**

## Table of comments

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
<p>STP Estates Group (inc. West Norfolk NHS Clinical Commissioning Group, Queen Elizabeth Hospital King's Lynn NHS Foundation Trust, Norfolk Community Health and Care NHS Trust, Norfolk and Suffolk NHS Foundation Trust)</p>	<p><b>Support</b></p>	<p>The STP estates group welcomes statement 3b in the policy to work with NHS Norfolk to ensure that new health facilities are provided to serve an expanded population. The group would like to point out that NHS Norfolk no longer exists and that health partners in King's Lynn and West Norfolk that would need to work with the Borough Council include West Norfolk Clinical Commissioning Group, Queen Elizabeth Hospital King's Lynn, Norfolk Community Health and Care NHS Trust and Norfolk and Suffolk NHS Foundation Trust. The STP estates group would like to refer to our previous comment under LP05 that where development triggers the need for additional capacity in health facilities (be that through new build, an extension to existing or</p>		<p>Will take on board the comments made and will amend wording where is deemed necessary</p>



Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		reconfiguration) it would be expected that a financial contribution is made by the developers towards the cost of increasing capacity.		
Ms Jan Roomes- Town Clerk Hunstanton Town Council	<b>Support</b>	Waveney Road, Jubilee Crescent and Elizabeth Close are in King's Lynn and West Norfolk Lower Super Output Area 001A which has deprivation indices that are on a par with an area in Gaywood and only exceeded by an area in North Lynn. Downham Market may also contain an area of deprivation.		The policy introduction does state that deprivation is a key issue in King's Lynn and other parts of the borough.
Mr Tom Clarke- National Planning Adviser Theatres Trust	<b>Support</b>	We welcome that the Council's opening position is to protect and enhance existing cultural assets. This would include the district's theatres which play an important role in bringing people together, providing opportunities to participate in and engage with the arts, reducing isolation (which is particularly important within more rural areas such as West Norfolk), and which	Amendment to part 5. and guidance as to how proposals seeking loss of facilities will be assessed.	Consider rewording to strengthen and provide evidence for the policy to protect cultural facilities

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		<p>support the vibrancy and viability of town centres. Where the policy could be further improved and strengthened is in part 5, where as currently drafted it leaves scope for highly valued and potentially viable facilities to be undermined if the Council is unable to secure a solution. For some facilities there might be alternative options available such as ownership by the community, charities, trusts or other such groups and the policy would benefit from this being made explicitly clear. We do however support the strength of part 6 in not permitting development which would result in the loss of cultural facilities. We would suggest that this policy is reinforced through guidance setting out criteria by which cultural facilities (as well as other social and community uses including pubs) will be assessed should proposals seeking loss be received. This would include robust evidence of marketing through appropriate channels, at a suitable rent/sale price for the building or land's existing use and condition, and that there is no longer a need for the facility amongst the local community or its users.</p>		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Ms Debbie Mack-Historic Environment Planning Adviser, East of England Historic England	<b>Support</b>	The Cultural Context Support - We welcome the reference to the rich cultural heritage of the area in this section of the Plan		Agreed
Ms Debbie Mack-Historic Environment Planning Adviser, East of England Historic England	<b>Object</b>	Object - We particularly welcome criterion 3c. We suggest that you give some examples of local distinctiveness. Eg building materials flint cobbles and brick, car stone etc. in different parts of the borough as well as building styles? This could be in the supporting text, either in association with this policy and/or the design policy.	Give examples of local vernacular and distinctiveness in different parts of the Borough either in association with this policy or the design policy.	Consider rewording and adding to 3c
Mrs Sarah Watts-Parish Clerk West	<b>Support</b>	West Winch Parish Council comments - It is essential that health facilities are provided		Will be considered in 9.4

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Winch Parish Council		for the major development currently planned and any additional development in the future. Residents need the GP Surgeries, Health Centre and other associated facilities.		
Planning Admin Team Sport England	<b>Support</b>	Sport England supports this policy in principle, as it seeks to protect, retain or enhance existing sport, leisure and recreational facilities. However the policy should be underpinned by a robust and up to date evidence base which identifies the key facilities to be protected (see comments on Policy LP19).		Look into the data noted about not having up to date evidence on key facilities and change wording where it may be necessary – which should be looked at in LP19

