

Table of Historic England's comments on the King's Lynn and West Norfolk Local Plan Review- April 2019

All comments made by Historic England have been addressed in the below table in reference to the Local Plan Review.

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN changes
3	Paragraph 2.0.7	Support	The dates now seem to make more sense. Thank you for amending.		<i>Noted.</i>
4	2.0.13	Object	It would be helpful to include an approximate timeframe for the NSPF	Include timeframe	<i>Noted/ Will make this change.</i>
5	2.0.20	Object	remove ' from end of sentence	remove ' from end of sentence	<i>Noted/ Will make this change.</i>
6	2.1.9	Object	We welcome the helpful reference to the heritage of Kings Lynn. We suggest that more could be made of this here, perhaps also including reference to the HAZ.	Amplify including reference to the HAZ.	<i>Noted/- No change will be made reference to HAZ is made in section 9.2.</i>
8	Box	Object	Please refer to Scheduled Monument rather than scheduled ancient monument. Modern convention is to refer to scheduled monuments rather than scheduled ancient monuments, given that a wide range and age of monuments are scheduled. This is in line with the NPPF. Please amend Historic Parks and Gardens to Registered Parks and Gardens, again in line with the NPPF. Finally it would be helpful to add the number of conservation areas in the borough.	Change Scheduled Ancient Monument to Scheduled Monument Change Historic Parks and Gardens to Registered Parks and Gardens Add the number of Conservation Areas	<i>Noted/ Will make this change.</i>

<b>Page</b>	<b>Section</b>	<b>Support/ Object</b>	<b>Comments</b>	<b>Suggested Change</b>	<b>BCKLWN changes</b>
13	Box	Support	Welcome the reference to Kings Lynn balancing the needs of conservation with urban renewal and strategic growth.		<i>Support welcomed.</i>
16	Box Bullet 18	Object	Whilst reference to brownfield redevelopment and renewal is welcomed, it would also be appropriate to refer to heritage led regeneration	Add reference to heritage led regeneration	<i>Noted/ Will make this change.</i>
16	Box Bullet 20	Support	We welcome reference to preserving and enhancing this major heritage asset.		<i>Welcome support.</i>
24	4.1.26 second bullet	Object	Typographical error – If, not of Also number bullet points	Change of to if	<i>Noted/ Will make this change.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
30/3 1	Policy LP01 Spatial Strategy	Object	<p>In bullet point 1, we suggest the addition of the word historic before natural environment. The historic environment is more than just the built environment.</p> <p>Suggest changing heritage, cultural to historic environment. The historic environment is considered the most appropriate term to use as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage.</p> <p>In bullet point 4 we welcome the reference high quality historic environment in the town. We wonder if bullets g-j would be better as i-iv? We every much welcome reference to the Heritage Action Zone.</p> <p>In bullet 6bi We welcome reference to heritage but suggest the use of the term historic environment instead for the reasons set out above.</p>	<p>Add the word historic before natural environment in bullet point 1</p> <p>Change bullets g-j to I – iv.</p> <p>Change heritage to historic environment.</p> <p>In 8 a ii add historic environment In 8 a iv change heritage to historic environment</p>	<p><i>Agree with the changes and will make this change</i></p>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
			In Bullet 8 a ii we welcome reference to local character and suggest the addition of the word historic environment. Again in 8 a iv historic environment would be more appropriate than heritage		
P40	Policy LP02 Settlement Hierarchy	Object	The third paragraph refers to environmental protection and nature conservation. It should also specifically refer to the conservation and enhancement of the historic environment.	Reference the conservation and enhancement of the historic environment in the third paragraph.	<i>Noted/ Will make this change.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
48	Policy LP05	Object	<p>We welcome reference to the historic environment at bullet k. S106 will continue to offer opportunities for funding</p> <p>improvements to and the mitigation of adverse impacts on the historic environment, such as archaeological investigations, access and interpretation, and the repair and reuse of buildings or other heritage assets. You may wish to clarify this matter in your policy.</p>		<i>Noted- this has been clarified under 1k in the policy</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
P50	LP06 5,1,5	Object	<p>Whilst we welcome reference to the historic environment, the reference to historic built environment implies that this is purely the built environment. We suggest it should read built and historic environment instead. The historic environment is considered the most appropriate term to use as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage. It also encompasses buried archaeology.</p>	We suggest it should read built and historic environment instead.	<i>Noted/ this change has been made</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
P51	Employment allocation Land adj to Hardwick Industrial Est, King's Lynn	-	No comments		N/A
P51	Employment allocation Land adj to Saddlebow roundabout, Kings Lynn	-	No comments		N/A
52	Employment allocation off St Johns Way, SW of Downham Market	-	No comments		N/A
52	Employment allocation adj to A148 s of Hunstanton Commercial	-	See comments later in the table		

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	Park				

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53	Policy LP06 The Economy	Object	Bullet point 5c should also refer to the historic environment Bullet point 6 e should read conserves or enhances the historic environment including the historic character... for greater consistency with the wording in the NPPF.	Bullet 5 c add and historic before environment  Bullet point 6e Change to conserves or enhances the historic environment including the historic character...	<i>Noted/ these changes have been made</i>
- 60	Policy LP08	Object	We suggest avoiding using the term 'enabling development' in this context. Enabling development has other definitions and we would generally say that enabling development is development that is contrary to Plan policy and as such has no place in the Plan. We suggest using some alternative wording in this instance.	Replace minimal adverse impact on....historical and natural environment qualities with 'conserve and enhance the historic and natural environment'.	<i>Noted- this change has been made.</i>
75	5.7.7 5.7.8 Policy LP12	Object	Are these lists intended as bullet points? Should the parking study that formed some of the heritage Action Zone work be referenced in this section?	Make lists into numbered bullet points Add reference to HAZ parking study.	<b>Agree - make lists into numbered bullet points. Add reference to the HAZ parking study.</b>
84	Policy LP14	Object	Welcome 1 b but change protecting to conserving and change archaeological to heritage assets in line with NPPF terminology.	change protecting to conserving and change archaeological to heritage	<i>This change has been made.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
			Welcome reference to local character of coastal areas in 2e.		
95	Policy LP16 Design and Sustainable Development	Object	We welcome criterion 2a but suggest changing the word protect to conserve in line with the NPPF.	Change protect to conserve	<b>Agree - change 'protect' to 'conserve' in 2a.</b>
97	6.4.1  LP17	Object	We welcome the reference to heritage assets. In first line change historic to heritage assets. Historic Parks and Gardens	Change historic assets to heritage assets. Change Historic Parks	<i>Noted- the change has been made and due to splitting up the policy of LP17 to have a separate historic environment section more text has been included in reference to registered parks and gardens in the supporting text</i>

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			should be Registered Parks and Gardens and Scheduled Ancient monuments should be scheduled monuments - current preferred terminology	and Gardens to Registered Parks and Gardens and Scheduled Ancient monuments to scheduled monuments	
100	LP17	Object	We welcome reference to heritage assets. However the tests are not exactly consistent with those set out in the NPPF.	Review wording for greater consistency with paras193 -197 of the NPPF.	<b>New policy for heritage provided.</b>



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100	Policy LP17 Environmental Assets	Object	<p>This is a very broad policy covering Green Infrastructure, Historic Environment, Landscape Character, Biodiversity and Geodiversity. Whilst this may be acceptable as a Strategic policy, I would expect to see more detail in a Local Plan regarding heritage assets. The policy should also be locally specific. We would suggest that there should be separate policy/policies for the historic environment.</p> <p>In any event, suggest conserve rather than protect in bullet point 1 for greater consistency with the NPPF.</p>	<p>Separate policy/policies for the historic environment. Should cover designated (listed buildings, registered parks and gardens, scheduled monuments and conservation areas) and nondesignated assets, and be locally specific. The policy/ies should also refer to the issue of settings. The issue of Heritage at Risk should also be addressed.</p>	<p><b>Agree - provide a separate heritage policy.</b></p> <p><b>Agree to change to 'conserve' rather than 'protect' in bullet point 1 for greater consistency with the NPPF.</b></p>
103	Policy LP18 Environment, Design and Amenity	Object	<p>Broadly welcome criterion 1 but again suggest change protect to conserve and use the term historic environment rather than heritage and cultural value.</p> <p>Bullet point 2a - suggest change to impact on historic environment.</p>	<p>Use the terms conserve, and historic environment.</p>	<p><i>Noted/ Will make this change.</i></p>
109	6.7.5 Policy LP20	Support	<p>We welcome reference to the historic environment in relation to green infrastructure</p>		<p><i>Support welcomed.</i></p>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
126	Policy LP26	Support	We welcome reference for development to be appropriate to the character of the settlement and its surroundings and the reference to the importance of some gaps which make a positive contribution to the street scene or views.		<i>Welcome the support</i>
140	The Cultural Context	Support	We welcome the reference to the rich cultural heritage of the area in this section of the Plan		<i>Welcome the support</i>
141	Policy LP32 Community and Culture	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.	<i>Noted/ Will make this change.</i>  <i>Extra text will come in due course.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
145	Chapter 8	Comment	Is there some text missing for Chapter 8? Is this an introductory section to settlements and sites?		No text is missing. The reference to 8- Settlements & Sites as rightly pointed out is introducing the section

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145	Policy LP34 King's Lynn Area	Object	<p>We note that you plan to carry forward the existing allocations including West Winch etc. Historic England has some concern at the over-reliance on these and other greenfield sites. Such sites are easy greenfield sites and the danger is that this will stifle urban regeneration and the unlocking of the brownfield sites which the HAZ project is seeking to deliver. How do you aim to ensure that the brownfield regeneration sites come forward?</p> <p>The recent Feasibility Study undertaken as part of the HAZ work looked at the potential of a number of sites in Kings Lynn to be brought forward for (re) development. Whilst we appreciate that not all of these sites will necessarily be taken forward, we would strongly suggest the inclusion of any of the sites that are to be pursued to be included as allocations within the new local plan. It is important that the Plan clearly shows the development strategy and future sites for development to the wider public. The Plan should also indicate how these sites could be developed (based on the findings of the</p>	<p>Specifically allocate some sites from the HAZ Feasibility Study – Unlocking Brownfield Potential</p> <p>Criterion 6 - change protecting for conserving.</p> <p>Add specific reference to local character – describe local building materials/vernacular etc. perhaps in paragraph 9.2.5</p>	<p><b>Disagree - no need to allocate sites from the HAZ as they can come forward for development in any case.</b></p> <p><b>Agree to change protecting to conserving in criterion</b></p> <p><b>6. Agree to adding specific reference to local character in 9.2.5.</b></p>

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			<p>feasibility study). Allocation within the plan could help to bring forward these sites and provide greater certainty.</p> <p>Once it has been decided which of these sites could come forward, the sites should be incorporated into the Local Plan. Ideally reference could be made to these sites in this policy.</p> <p>We welcome criterion 6 although suggest changing protecting to conserving in line with the NPPF wording.</p> <p>We welcome criterion 8 although can we be more specific about local building materials etc.? Perhaps this could be included in paragraph 9.2.5</p>		

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
148	9.2.5	Object	We welcome reference to King's Lynn's distinctive identity but more could be	more could be said here regarding	<b>Agree to adding specific reference to</b>

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			said here regarding building materials, styles character etc.	building materials, styles character etc.	<b>local character in 9.2.5.</b>
151	9.2.19	Object	We welcome the reference to the Heritage Action Zone here but consider that more could be said about what has been done.	Add more regarding the HAZ	<b>Agree – add more text about the King’s Lynn HAZ at 9.2.19.</b>
	Site Allocations – General Comment	Comment	<p><b>General comments on allocations</b></p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets <b>and</b> their settings</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g.</p> <p>conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful</p>		<i>Noted/ Will make this change</i>

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			<p>design or maintaining key views or buffer/set back/breathing space etc.</p> <p>Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above. Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage</p>		

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			<p>assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p> <p>It would be helpful if there were maps of the allocation sites within the plan e.g. just before each policy. There are for some sites but not all.</p>		

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Chnages
153	Policy E1.1 King's Lynn – Town Centre	Comment	<p>We welcome reference to historic character, local distinctiveness etc. in criterion 1.</p> <p>Paragraph f on shop frontages is broadly welcomed too.</p> <p>The provision of “larger, modern format retail units” (paragraph e) will need to be carefully located and designed to avoid harm to heritage assets. This applies as much to the Town Centre Retail Expansion Area (Policy E1.2) as it does elsewhere in the town centre.</p>		<i>Noted</i>
	Policy E1.2 King's Lynn – Town Centre Retail Expansion Area	Comment	The provision of “larger, modern format retail units” (paragraph e) will need to be carefully located and designed to avoid harm to heritage assets.		<i>Noted.</i>
	Policy E1.2A King's Lynn – Port Policy	-	No comments		<i>No comment.</i>

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158	Policy E1.3 King's Lynn – Gaywood Clock	Object	This area includes a number of grade II listed buildings and the grade II* Church of St Faith. Reference should be made to these listed buildings at least in the supporting text and ideally the policy too.	Reference should be made to the listed buildings at least in the supporting text and ideally the policy too.	<b>Agree included reference to the listed buildings in the supporting text to Policy E1.3 para. 9.2.4.1.</b>



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160	Policy E1.4 King's Lynn – Marsh Lane	-	No comments		<i>No comment.</i>
163	Policy E1.5 King's Lynn – Boal Quay	Object	<p>The King's Lynn Conservation Area lies immediately to the east and north of this site. The Conservation Area includes a large number of listed buildings near to this site, many of which are listed at grade II but also including the Church of All Saints which is listed at Grade II*.</p> <p>Whitefriars Gateway scheduled monument lies on the eastern boundary of the site. Any development of the site therefore has the potential to impact upon the setting of these heritage assets. The broad principle of redevelopment of this site is acceptable and a Masterplan exists for site.</p> <p>Whilst the draft policy refers to the need for archaeological assessment, it should also refer to the need to conserve and enhance the significance and setting of nearby heritage assets, specifically listed buildings and the conservation area (similar wording is used for other site policies). There is no reference to the</p>	Add reference to the need to conserve and enhance the significance and setting of nearby heritage assets, specifically listed buildings and the conservation area.	<p><b>Agree - Add reference to the need to conserve and enhance the significance and setting of nearby heritage assets, specifically listed buildings and the conservation area to the Policy with appropriate supporting text.</b></p> <p>This has been done</p>

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			<p>Waterfront Regeneration Area masterplan either, so it is not clear whether this document remains valid and whether the site can accommodate 350 dwellings (and potentially other uses).</p> <p>As currently drafted, the plan is unsound in terms of its effectiveness, deliverability and consistency with national policy. The Planning Practice Guidance states “where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the ‘what, where, when and how’ questions)” (PPG Reference ID: 12-010-20140306 (last revised 06/03/2014). Paragraph 16d of the NPPF also states that only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Protecting and enhancing the historic environment is a strand of the environmental objective of the planning system (Paragraph 8c) and Local Plans should set out a</p>		

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			positive strategy in this respect (Paragraph 185).		

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166	Policy E1.6 King's Lynn – South of Parkway	-	No comments		<i>No comment.</i>

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168	Policy E1.7 King's Lynn – Land at Lynnsport	-	No comments		<i>No comment.</i>
169	Policy E1.8 King's Lynn – South Quay	Support	As with Boal Quay, this is a sensitive site within the historic core of King's Lynn, located within the conservation area and contains/adjoins listed buildings. We welcome the reference to retaining the listed Sommerfeld and Thomas Warehouse, submitting an archaeological assessment, retaining Devil's Alley as a public right of way and the sympathetic design approach to address the conservation area and nearby listed buildings.		<i>Support noted</i>
172	Policy E1.9 King's Lynn – Land west of Columbia Way	-	No comments.		<i>No comment.</i>
173	Policy E1.10 King's Lynn – North of Wisbech Road	Object	Whilst there are no designated heritage assets on the site, the Kings Lynn Conservation Area lies to the north of the site. Any development of the site therefore has the potential to impact on the setting of the Conservation Area. Therefore, the policy should include reference to the need for development to preserve or where opportunities arise enhance the Kings Lynn Conservation Area and its setting'	Add criterion re conservation area Development should preserve or where opportunities arise enhance the Kings Lynn Conservation Area and its setting'	<b>Agree - Added criterion re conservation area 'Development should preserve or where opportunities arise enhance the Kings Lynn Conservation Area and its setting'</b>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
174	Policy E1.11 King's Lynn – Southgates	Object	Whilst there are no designated heritage assets on the site, the Kings Lynn Conservation Area lies to the north. South Gate, a scheduled monument and listed at Grade I Any development of the site therefore has the potential to impact on the setting of these heritage assets. Therefore the policy should include reference to the need for development to conserve and where appropriate enhance heritage assets and their settings	Add criterion re heritage assets. 'Development should conserve and where appropriate enhance heritage assets and their settings'	<b>Agree - Added criterion re heritage assets. 'Development should conserve and where appropriate enhance heritage assets and their settings'</b>
175	Policy E1.12 King's Lynn – Employment Land	-	No comments		<i>No comment.</i>
180	Policy E1.14 King's Lynn – West Lynn – West of St Peters Road	Object	Whilst there are no designated heritage assets on the site, a grade II listed building lies to the east of the site. Any development will need to preserve the nearby listed building and its setting. At present the policy does not refer to the listed building or its setting.	Add criterion re nearby listed building. 'Development should preserve the nearby listed building and its setting'	<b>Agree - Add criterion re nearby listed building. 'Development should preserve the nearby listed building and its setting'</b>

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

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			setting of the conservation area and other heritage assets. We request that greater clarification is provided with regards to the redevelopment of this site, including the number of dwellings that can be reasonably delivered. The policy itself also needs to state that development should conserve and enhance the significance and setting of nearby heritage assets, particularly the conservation area and listed buildings.		

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185	Policy E2.1 West Winch Growth Area Strategic Policy	Object	Whilst there are no designated heritage assets within the growth site, there are a number of listed buildings nearby including the Grade I listed Church of All Saints in North Runcton and Grade II* listed Church of St Mary in West Winch the Old Windmill, The Gables and The Old Dairy Farmhouse listed at grade II. Given the scale of the development we suggest that a Heritage Impact Assessment be undertaken now to understand the significance of the heritage assets and make recommendations for the protection of their settings etc. This work should be undertaken in accordance with our advice note on site allocations and should form part of the evidence base for the Local Plan.	Undertake HIA for site in advance of masterplanning and EiP to inform masterplan and provide evidence for Local Plan	<b>Make reference at Paragraph 9.4.1.57 to the other heritage assets listed by HE.</b>

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			<p>We note the requirement at criterion 7 for a heritage assessment which we welcome. Given that work is commencing on the masterplanning for this site, we suggest that this work should be completed now as part of the evidence base for the Plan. This could then also inform the strategic concept diagram in the Plan for the site.</p> <p>Paragraph 9.4.1.57 Reference should also be made to other heritage assets listed above.</p>		

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201	Policy E2.2 Development within existing built up areas of West Winch	-	No comments		<i>No comment.</i>
206	Policy E3.1 Hall Lane, South Wootton	Object	<p>Whilst there are no designated heritage assets within the site boundary, the Grade II* Church of St Mary lies within centre of village to the east of the site, with potential for some impact on its setting and views towards the church. We note the requirement for a heritage assets assessment in criterion f which is welcomed. It would be helpful if specific reference could also be made to the</p>	Make reference to the church and views of the church within the policy.	<i>Noted. Will makes the changes.</i>



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			church and views of the church from the site within the policy.		
214	Policy E4.1 Knights Hill	Support	<p>Whilst there are no designated heritage assets with the site, there is a grade II listed as part of the Hotel complex at Knights Hill to east. In addition, Castle Rising (scheduled monument and grade I listed building, and the church of St Lawrence, Castle Rising, also grade I listed) to the north and the remains of the Church of St James (scheduled monument and grade I listed) and a Saxon and Medieval settlement (scheduled monument) to the south. Any development of the site has the potential to impact on the setting of these heritage assets.</p> <p>While there is scope for development on this site, we are keen to ensure that proposals are sympathetic to the historic environment and specific heritage assets. As paragraph 9.6.3 notes there are several heritage assets in the surrounding area, and there may also be on-site archaeology.</p>		<i>No comment.</i>

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			We welcome the requirement for a heritage assessment and part A (f) of the policy and the requirements for landscape planting along the east and north of the development. Care will need to be taken to ensure that development is not overly prominent along the north and east boundaries in order to lessen impact on nearby heritage assets.		

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221	Policy LP35 Downham Market	Object	We welcome the reference to the built and historic environment at criterion 3 of this policy. We suggest replacing the word respect with conserve, more in line with the terminology of the NPPF.	Replace the word 'respect' with 'conserve'.	<i>Noted. Will make the changes.</i>
223	Paragraph 10.2.4 and 5	Support	We very much welcome the reference to heritage assets and local building materials.		<i>No comment.</i>
224	Policy F1.1 Downham Market Town Centre and Retailing	Object	We welcome criterion 2 and the reference to historic character and local distinctiveness. The policy could be further improved by making more detailed reference to the specific character and vernacular of Downham Market within the policy as in paragraphs 10.2.4 and 5. This point applies to other similar policies	Make more detailed reference to the specific character and vernacular of Downham Market within the policy.	<i>No change</i>

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			throughout the plan and should be applied to those scenarios too.		
	Policy F1.2 – Land off St John's Way, Downham Market	Object	Whilst there are no designated heritage assets within this site, the Downham Market Conservation Area lies to the north east of the site and includes a number of grade II listed buildings at the western end of the conservation area, . Any development of this site has the potential to affect the setting of the conservation area. To that end, we suggest the inclusion of a criterion in the policy to conserve and where appropriate enhance heritage assets and their settings.	Include additional criterion  Development should conserve and where appropriate enhance heritage assets and their settings including the Downham Market Conservation Area and listed buildings.	<i>Noted- changes have been made</i>
	Policy F1.3 Downham Market North East Land east of Lynn Road in vicinity of Bridle Lane	Support	Whilst there are no designated heritage assets within the site, the Wimbotsham Conservation Area including the grade II* church lies to the north of the site. We welcome the requirement for a heritage assessment and measures to conserve heritage assets as appropriate, given that the site lies within a short distance of Wimbotsham Conservation Area and other heritage assets.		<i>Noted.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
	Policy F1.4 Down Market South East: Land north of southern bypass in vicinity of Nightingale Lane	Support	We welcome the requirement for an archaeological assessment of this site.		<i>No comment.</i>
241	Policy F2.1 Hunstanton Town Centre Area and Retailing	Object	We welcome criterion 2 and the reference to historic character and local distinctiveness. The policy could be further improved by making more detailed reference to the specific character and vernacular of Hunstanton within the policy.	Make more detailed reference to the specific character and vernacular of Hunstanton within the policy.	<i>No comment.</i>
243	Policy F2.2 Hunstanton – Land to the East of Cromer Road	Object	We continue to have particular concerns about this proposed site allocation and its impact on the historic environment. It has the potential to detract from the significance and setting of Old Hunstanton Conservation Area to the north and Hunstanton Hall to the east (a Grade II registered park). Hunstanton Conservation Area lies to the south west of the site. Although the draft policy refers to the need to minimise impact on these assets (although no mention is made of the Hunstanton Conservation Area and listed buildings) and the submission of a heritage asset statement, development in this location		<i>No change- under construction.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
			<p>will still represent a marked change in the landscape and the growth of Hunstanton. Furthermore, the introduction of additional planting into the landscape may, in itself, cause harm rather than mitigate impacts.</p>		

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
			<p>We have previously advised that this site should be moved away from Chapel Bank road by approximately 200 metres to reduce the impact on Old Hunstanton Conservation Area. Limited development to the south of Hunstanton or development immediately to the north of the Downs Road area would be an alternative to this site and more in line with the Core Strategy.</p> <p>Development would cause harm to the significance of several heritage assets and not comply with the NPPF including paragraphs 8c (protecting and enhancing the historic environment as part of the environmental objective of the planning system), 185 (Local Plans setting out a positive strategy for the historic environment) and 32 (avoid adverse impacts on the environment).</p> <p>Whilst we note criteria 5 and 6 of the policy seek to address heritage matters, we remain unconvinced that a Heritage Asset statement would be able to conclude that there will be no negative impact on heritage assets in the locality.</p> <p>However, we recognise that this site was allocated in the previous Local Plan and</p>		

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
			indeed benefits for outline planning permission.		
246	Policy F2.3 Land south of Hunstanton Commercial Park	Object	Whilst there are no designated heritage assets within the proposed site allocation, there are two grade II* listed building to the north of the site as part of Smithdon school, the scheduled and grade II* listed remains of the Chapel of St Andrew to the south east and a grade II listed water tower to the west.		<i>No change.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
			<p>We continue to have concerns about this site and its impact on the historic environment and remain of the opinion that its allocation should be avoided. As stated in our comments on the Core Strategy, our 2011 response to the Issues and Options consultation, our email dated 20 July 2012, our 2013 Preferred Options response and our email dated 4 March 2014 (and several verbal discussions) as well as our comments on the pre-submission draft, it would harm the significance and setting of the Grade II* listed Smithdon High School to the north and the Grade II* listed and scheduled remains of St Andrew's Chapel to the south-east. Development of the site would further divorce the school from its rural context and surroundings and impact on views to and from the school. Built in the early 1950s, it has associations with agricultural training and was intended to be located on the edge of town. Its setting has already been compromised to the north and west, meaning that its eastern and southern setting is even more important to maintain. The development site would also detract from the setting of the listed and scheduled chapel, which currently enjoys a largely rural and remote location within the countryside.</p>		



Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
			<p>Although the draft policy refers to the need to minimise impact on these heritage assets (as well as the North Norfolk AONB) and the submission of a heritage asset statement, development in this location will still represent a marked change in the landscape and the growth of Hunstanton. Furthermore, the introduction of additional planting into the landscape may, in itself, cause harm rather than mitigate impacts. The Core Strategy makes it clear that areas for urban expansion are to the east and south of Hunstanton, with the Inspector's report considering that eastern expansion in the Downs Road area is sound (paragraph 82) along with development south of the town to the west of the A149 (paragraph 83). He considered that development to south-east of Hunstanton would have a very detrimental impact on the landscape (paragraph 83). Site F2.3 could be considered within this south-eastern extent rather than part of the Downs Road area (the site does not fall within the urban expansion arrow on the Hunstanton Key Diagram). Alternative sites to Site F2.3 should be considered, such as limited development to the south of Hunstanton or development immediately to the north of the Downs Road area.</p>		

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
			We acknowledge that this site was allocated in your 2016 SADMP and indeed permission has been granted in 2016 for the site. However, we continue to have concerns regarding this allocation and the impact on the historic environment.		

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
250	Policy F2.4 Hunstanton Lane north of Hunstanton Road	Support	We welcome the requirement for an archaeological field evaluation of the site in criterion 13.		<i>Noted – we welcome the support.</i>
253	Policy F2.5 Hunstanton Employment Land south of Hunstanton Commercial Park Land	Object	We note that this employment site was originally allocated in the 1998 Local Plan, although has not yet come forward for development. It is therefore difficult to argue against the principle of this site, although the lack of development in over 20 years perhaps raises questions about the suitability and viability of this site. The existing employment land to the north is an unfortunate intrusion into the setting of the Grade II* Smithdon High School and it would be a considerable enhancement to this heritage asset if such use was relocated elsewhere. Site F2.5 would add to the urbanisation of Hunstanton to the east of the A149 and to the south of the	The policy should include design criteria in relation to the protection of nearby heritage assets.  It would be helpful if the Plan could clarify whether this site has come forward for development to date.	<i>Noted. Policy text has been added in relation to the protection of the nearby heritage asset under point 3 a-d.  The site description has been updated. The site currently has outline planning permission.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
			<p>school and affect the significance and setting of this heritage asset.</p> <p>The draft policy does not contain any detail in terms of the design of Site F2.5, but we feel such detail should be included with regards to the school. For example, we would want to avoid development that was taller or bulkier than the existing employment site to the north, in order to reduce the impacts on the listed school.</p> <p>It is not clear from the Plan whether this site has come forward for development with site F2.4. It might be helpful if the Plan were to clarify this position.</p>		

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
255	Policy F3.1 Wisbech Fringe – Land east of Wisbech (west of Burrettgate Road)	Object	Whilst there are no designated heritage assets within the site, there is a grade II listed building to the north west of the site. Development of this site has the potential to impact upon the setting of this listed building. There is currently no reference to this nearby heritage asset within the policy. We suggest that the policy is amended to include a criterion for the protection of the setting of the heritage asset.	Include an additional criterion to read, 'Development should preserve the listed building and its setting'.	<b>Agree - amended the wording as suggested.</b>
271	Policy G56.1 Marham Land at The Street	-	No comments		<i>No comment.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
272	Policy MAR1 Marham Land off School Lane	-	No comments		<i>No comment.</i>
275	Policy G112.1 Watlington – Land south of Thieves Bridge Road	-	No comments		<i>No comment.</i>
276	Policy WAT 1 Watlington – Land to east of Downham Road and west of Mill Road	Object	<p>Whilst there are no heritage assets within the site boundary, there is a grade II listed building to the west of the site and a non-designated moated site also to the west of the proposed site allocation. The grade I listed Church of St Paul and Peter, the grade II listed Manor House and grade II listed Watlington House also lie in close proximity to the site. Any development would have the potential to impact upon the setting of these heritage assets.</p> <p>We note the inclusion of criterion 4 of the policy that requires a heritage Impact Statement.</p> <p>We have considerable concerns regarding the development of this site at this density, given the proximity of the heritage assets including the grade I listed church. We would recommend an early HIA in advance of the next draft of the Plan to help determine the suitability of the site</p>	<p>We recommend that an HIA be undertaken now in advance of the next draft of the Local Plan to help determine the suitability of the site per se and the extent of the developable area and thus the capacity of the site. This will then help inform the Plan and any potential policy wording.</p>	<i>Noted. No longer promoting this site.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
			per se and the extent of the developable area and thus the capacity of the site.		

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
283	Policy G13.1 Brancaster – Land to the east of Mill Road	Support	We do not oppose the allocation of this site and welcome the requirement in the policy that development addresses the setting of Brancaster Conservation Area.		<i>Noted.</i>
284	Policy G13.2 Brancaster Staithe and Burnham Deepdale – Land off The Close	Support	We do not oppose the allocation of this site, set at some distance from the Roman Fort scheduled monument.		<i>Noted.</i>
290	Policy BM1 Burnham Market Land south of Joan Short's Lane and east of Creake Road	Object	Whilst there are no designated heritage assets within the site boundary the Burnham Market Conservation Area lies immediately to the north of this site. Crabbe Hall, listed at grade II also lies to the north of the site. Any development in this location has the potential to impact upon the setting of the Conservation Area and the listed building. In particular, consideration should be given to views into and from the Conservation Area from the higher land to the south east. We suggest that you undertake a brief heritage impact assessment in	Complete a brief Heritage Impact Assessment for the site to consider the likely impact of development on heritage assets. The site should be reduced in size and the policy amended to reference the setting of the listed buildings.	<i>No comment.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
			advance of the next draft of the Plan to help determine the suitability and extent of the site allocation. We suggest that perhaps only the southern part of this site be allocated to allow for redevelopment of the former farm, leaving the northern half of the site open as protection for the setting of the Conservation Area. We welcome the reference to the setting of the Conservation Area in the policy and paragraph 12.2.1.7. We note that the setting of the listed buildings is also mentioned in paragraph 12.2.1.7 but not in the policy.		

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
292	PolicyG17.1 Burnham Market	Object	It is not clear where this policy is in the Plan. There would appear to be a gap after paragraph 12.2.1.12 and the site does not appear on the maps.		<i>Noted. Delete the gaps.</i>
292	paragraphs 12.3.1. and 12.3.2	Support	We welcome these paragraphs and the references to the historic environment and local vernacular.		<i>Noted.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
295	Policy G22.1 Castle Acre- Land west of Massingham Road	Object	<p>As commented during the previous local plan consultations, we continue to have some concerns about this site in terms of its location on the edge of Castle Acre Conservation Area and its proximity to a listed building. However, it remains a more preferable site than some other potential sites within the village.</p> <p>The policy requirement for development to conserve the setting of the conservation area and listed building is welcomed and the need for the design and layout to preserve and enhance the conservation area. However, the conservation area character statement identifies an important unlisted building within the site. It is not clear from the policy or supporting text what would happen to this building, with the potential for its demolition and resulting harm to the significance of the conservation area.</p> <p>As currently drafted, the plan is unsound in terms of its effectiveness, deliverability and consistency with national policy. The Planning Practice Guidance states “where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and</p>	Add wording that requires development to retain and conserve the important unlisted building.	<i>No further action.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
			<p>other interests about the nature and scale of development (addressing the ‘what, where, when and how’ questions)” (PPG Reference ID: 12-010-20140306 (last revised 06/03/2014). Paragraph 16d of the NPPF also states that only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Protecting and enhancing the historic environment is a strand of the environmental objective of the planning system (Paragraph 8c) and Local Plans should set out a positive strategy in this respect (Paragraph 185).</p> <p>In order to make the plan sound, there should be wording that requires development to retain and conserve the important unlisted building.</p> <p>We note that planning permission has now been granted for this site.</p>		



Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
299	Policy G25.1 Clenchwarton – Land between Wildfields Road and Hall Road	-	No comments		<i>No comment.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
300	Policy G25.2 Clenchwarton – Land north of Main Road	-	No comments		<i>No comment.</i>
	Policy G25.3 Clenchwarton – Land south of Main Road	-	No comments		<i>No comment.</i>
303	Policy CLE1 Clenchwarton – Land to the north of Main Road	-	No comments		<i>No comment.</i>
307	Policy G29.1 Dersingham – Land north of Doddshill Road	Comment	<p>We do not oppose the allocation of this site, but do have some concerns regarding potential impacts on the historic environment, including the conservation area.</p> <p>We welcome the references to the conservation area within the draft</p>		<i>No comment.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
			<p>policy and the requirement for a Heritage Statement.</p> <p>However, we note that the site has been previously allocated and does now benefit from planning permission.</p>		
309	Policy G29.2 Dersingham – Land at Manor Road	Object	<p>We continue to have considerable concerns about this site allocation and oppose its inclusion in the plan. We have previously expressed reservations about this site and its impact on Dersingham Conservation Area, the Grade I listed Church of St Nicholas to the north-west and the scheduled medieval moated site to the east. The site is an attractive area of paddock within the conservation area that makes a positive contribution to the significance of the conservation area, the church and the scheduled monument. A development of ten houses in this location would cause considerable harm to the significance of these heritage assets through the urbanisation of their character, appearance and setting.</p> <p>While the policy requires development to conserve the</p>		<i>Noted. Will correct the error.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
			<p>conservation area and the church (incorrectly referred to as the Church of St Mary, rather than St Nicholas), and requires the submission of a heritage statement, this does not overcome our objection to the principle of allocating this site.</p> <p>However, we note that the site has been previously allocated and does now benefit from planning permission</p>		

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
313	Policy G30.1 Docking – Land situated of Pound Lane (Manor Pasture)	Object	<p>We continue to have concerns regarding the proposed allocation of this site and its impact on the historic environment. It is a large site to the north of the conservation area that forms a rural backdrop as one enters or leaves Docking along Pound Lane and Sandy/Bradmere Lane. We note in paragraph G30.7 that the site is bounded by significant trees on its eastern, south-eastern, southern and southwestern sides, and that the overall density will be low, but there is still potential for harm. While the policy requires that development addresses the setting of the conservation area and the submission of a Heritage Statement,</p>		<p><i>We note the concerns. However, the site has been through the full examination and planning approval considered the balance of conservation interests.</i></p>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
			<p>we remain cautious about the merits of allocating this site.</p> <p>However, we note that the site has been previously allocated and does now benefit from planning permission.</p>		
315	Policy DOC1 Docking Land south of Pound Lane and west of Bradmere Lane	Comment	There are no designated heritage assets within the site boundary. The Docking Conservation Area lies to the north and south of the site. We note the requirement for a heritage asset statement at criterion 2 which is welcomed.		<i>This site is being taken out of the LPR.</i>
319	Policy G31.1 East Rudham– Land off Fakenham Road	-	No comments		<i>No Comment.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
320	Policy RUD1 East Rudham – Land to north of Lynn Road	Object	Whilst there are no designated heritage assets on the site, a grade II listed building, The Grove Farmhouse, lies to the west of the site. Any development has the potential to affect the setting of this listed building. There are however a number of buildings between the site and the listed building. We note criterion 2 of the policy relating to heritage. We suggest that the wording could be amended to read 'Development should preserve the listed building and its setting'	Amend wording to read 'Development should preserve the listed building and its setting'.	<i>Site is being taken out of the LPR.</i>
326	Policy G34.1 Emneth – Land on south of The Wroe Policy	-	No comments		<i>No comment.</i>
327	Policy EM1 Emneth Land north of Church Road	-	No comments		<i>No comment.</i>
331	Policy G35.1 Feltwell – Land to the rear of Chocolate Cottage, 24 Oak Street	Object	Welcome requirement for archaeological field evaluation but the reference to the NPPF is to the old NPPF paragraph number.	Use correct NPPF paragraph number	<i>Noted- change has been made</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
332	Policy G35.2 Feltwell – Land north of Munson’s Lane	Object	Welcome requirement for archaeological field evaluation but the reference to the NPPF is to the old NPF paragraph number.	Use correct NPPF paragraph number	Site is not being carried forward.
334	Policy G35.3 Feltwell – Land at 40 Lodge Lane/Sky Gardens	-	No comments		<i>No comment.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
335	Policy G35.4 Hockwold cum Wilton – Land south of South Street	Object	<p>We have previously raised considerable concerns in relation to this site, given its proximity to the scheduled monument. We maintain these concerns. We note reference to the scheduled monument in the policy which is welcomed.</p> <p>We acknowledge that the site was allocated in the previous Plan and we note that the site now benefits from planning permission for 3 dwellings.</p>		<i>No further action</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
341	Policy G43.1 Great Massingham – Land south of Walcup's Lane	Object	<p>We have previously expressed considerable concerns about this allocation adjacent to Great Massingham Conservation Area and also situated within the grounds of an undesignated Augustinian priory of potential equivalent value to a scheduled monument</p> <p>The allocation would still have a considerable effect on the significance of the conservation area in terms of development within its setting. The site lies to the west of the network of ponds and green space that run through the heart of the original village and form a large part of the conservation area's significance. It forms part of the approach into the conservation area from Walcup's Lane and is within the setting of the Grade II listed Abbey Farm and other historic buildings. The allocation would immediately adjoin the conservation area and result in modern residential development encroaching onto the historic core of the village. At present, Walcup's Lane forms a clear boundary between the modern and historic parts of the village, and this distinction would be lost. Impacts on the significance of the listed Abbey Farm would be similar and are also relevant.</p>		<i>No further action</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
			<p>In terms of archaeological impacts, the site is located within the grounds of the Augustinian priory. The full extent and significance of the priory has yet to be established, but evidence suggests that the priory extended west along Walcup's Lane, meaning any development in this location could impact on remains of considerable archaeological interest. The site needs to be justified in terms of its archaeological impact, and there may be archaeological remains that would need preserving in-situ depending on their significance. This could affect the deliverability of this site.</p> <p>We still consider that development in this part of Great Massingham is likely to have considerable negative impacts on the village's historic environment, particularly its conservation area and archaeology.</p> <p>We do however welcome the references in the supporting text and policy to heritage including the Conservation Area, listed building and priory.</p> <p>We note that the site was allocated in the previous plan and now benefits from outline planning permission.</p>		



Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
343	Policy GM1 Great Massingham Lane east of Castle Acre Road	Object	Whilst there are no designated heritage assets within the site, the site lies immediately to the south east of the Great Massingham Conservation Area. Any development has the potential to impact upon the setting of the Conservation Area. We welcome the reference to the Conservation Area in the policy but suggest the wording be amended to more closely reflect the legislation.	Amend wording to read, Development should preserve or where opportunities arise enhance the Conservation Area and its setting.	Remove from LPr
347	Policy G41.1 Gayton – Land north of Back Street	-	No comments		<i>No comment.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
348	Policy G41.2 Grimston and Pott Row – Land adjacent Stave Farm, west of Ashwicken Road	-	No comments		<i>No comment.</i>
354	Policy G47.1 Heacham – Land off Cheney Hill	-	No comments		<i>No comment.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
356	Policy G47.2 Heacham – Land to the south of St Mary's Close	Object	<p>As preciously advised, the site adjoins Heacham Conservation Area to the east and appears to contribute positively to its significance and setting. Given its sensitive location (also close to the AONB) and relatively small number of dwellings compared to the overall requirement for Heacham (6 out of 66 dwellings), it may be preferable to increase the provision at Site G47.1 (where there are no designated heritage asset issues). Notwithstanding the above, we welcome the reference to the conservation area within the policy.</p> <p>We note that the site was allocated in the previous plan and now benefits from outline planning permission.</p>		<i>No further action</i>
363	Policy G57.1 Marshland St James Land adjacent of Marshland Saint James Primary School	-	No comments		<i>No comment.</i>
364	Policy G57.2	-	No comments		<i>No comment.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
	Marshland St James Land adjacent 145 Smeeth Road				
366	Policy MSJ1 Marshland St James Land south of School Road	-	No comments		<i>No comment.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
371	Policy G59.1 Methwold – Land at Crown Street	Object	<p>As stated previously, this site is situated in a very sensitive location within Methwold Conservation Area near to the Grade I listed Church of St George and Grade I listed Old Vicarage. Development would infill open space between the church and historic properties further west along Crown Street. There are prominent views of the church looking north-east along Crown Street from these historic buildings (e.g. 26 Crown Street), with the site situated to the left of this view. Views from the church and churchyard itself look towards the site and out to countryside. Paragraph G59.1 acknowledges the outstanding quality of the streetscape within the village, which includes this location. We are therefore very concerned that development of this site would intrude into such views and streetscape and harm the significance and setting of the church, conservation area and other heritage assets.</p> <p>Notwithstanding the reference to the conservation area and listed buildings in the policy, (the policy wording only refers to the setting of the conservation area, when the site is actually within the conservation area), we continue to have considerable concerns about this site.</p>		<i>No further action.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
			However, we note that the site was allocated in the previous plan and now benefits from full planning permission.		

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
372	Policy G59.2 Methwold – Land at Herbert Drive	-	No comments		<i>No comment.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
374	Policy G59.3 Methwold – Land at Hythe Road	-	No comments		<i>No comment.</i>
375	Policy G59.4 Methwold – Land off Globe Street/St George's Court	Object	<p>This site is located within Methwold Conservation Area and adjoins a medieval earthwork site of potentially considerable archaeological interest. It is therefore a sensitive location with the potential to have a notable impact on the significance of the conservation area and undesignated archaeology through the loss of open space. However, it does not have the issues that G59.1 has in terms of impact on listed buildings and one of the main routes through the conservation area, and some development could be deliverable.</p> <p>We note the requirement for a heritage statement and archaeological assessment which is helpful.</p> <p>However, we note that the site was allocated in the previous plan and now benefits from full planning permission.</p>		<i>No further action.</i>
379	Policy G60.1 Middleton Land south of Walter Howes Crescent	-	No comments		<i>No comment.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
380	Policy MID1 Middleton Land west of School Road	-	No comments		<i>No comment.</i>
383	Policy G83.1 Snettisham Land south of Common Road and behind Teal Close	-	No comments		<i>No comment.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
387	Policy G85.1 Southery Land off Lions Close	-	No comments		<i>No comment.</i>
388	Policy SOU1 Southery – Land to north of Lions Close	-	No comments		<i>No comment.</i>
392	Policy G88.1 Stoke Ferry – Land South of Lark Road/Wretton Road	-	No comments		<i>No comment.</i>
393	Policy G88.2 Stoke Ferry – Land at Bradfield Place	-	No comments		<i>No comment.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
395	Policy G88.3 Stoke Ferry – Land at Indigo Road/Lynn Road	Object	This site immediately adjoins Stoke Ferry Conservation Area. While we have no objection to its redevelopment, it will need to be handled sensitively to avoid harming the significance of the conservation area and other heritage assets. The policy makes reference to the conservation area, which is welcomed. We note that the site was allocated in the previous plan and now benefits from full planning permission.		<i>No further action.</i>
397	Policy STF1 Stoke Ferry Land to west of Fairfield Road	-	No comments		<i>No comment</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
401	Policy G93.1 Terrington St Clement – Land at Church Bank, Chapel Road	-	No comments		<i>No comment</i>
402	Policy G93.2 Terrington St Clement – Land Adjacent King William Close	Object	Given this site's location, we welcome the recognition given to the conservation area and listed buildings in the draft policy and supporting text. It is not clear which listed building is being referred to in the policy; this would benefit from clarification.	Identify which listed building in the policy and supporting text.	<i>This change has been made.</i>



Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
			We note that the site was allocated in the previous plan and now benefits from full planning permission.		
404	Policy G93.3 Terrington St Clement – Land West of Benn’s Lane	Object	Whilst there are no designated heritage assets within the site, the Terrington St Clement Conservation Area including grade I listed Church and Tower are located to the south west of the site. Any development has the potential to affect the setting of the Conservation area and listed buildings. Reference should be made to the need to conserve and where appropriate enhance heritage assets and their settings in both the policy and the supporting text.	Amend policy to state that Development should conserve and where appropriate enhance the Conservation Area and grade I listed Church and Tower and their settings.	<i>Change has been made.</i>
406	Policy TSC1 Terrington St Clement Land south of Northgate Way and west of Benn’s Lane Policy	Object	Whilst there are no designated heritage assets within the site, the Terrington St Clement Conservation Area including grade I listed Church and Tower are located to the south of the site and the grade II listed Tower House to the north of the site. Any development has the potential to affect the setting of the Conservation area and listed buildings. Reference should be made to the need to conserve and where appropriate enhance heritage assets and their settings in both the policy and the supporting text.	Amend policy to state that Development should conserve and where appropriate enhance the Conservation Area and grade I listed Church and Tower, grade II listed Tower House and their settings.	<i>Change has been made.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
412	Policy G94.1 Terrington St	-	No comments		<i>No comment</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
	John, St John's Highway and Tilney St Lawrence – Land east of School Road				
413	Policy G94.2 Terrington St John, St John's Highway and Tilney St Lawrence – Land north of St John's Road	-	No comments		<i>No comment</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
417	Policy TSL1 Tilney St Lawrence Land adjacent to Tilney St Lawrence Primary School, west of School Road	-	No comments		<i>No comment</i>
418	Policy TSL2 Tilney St Lawrence Land to the west of School Road	-	No comments		<i>No comment</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
423	Policy G104.1 Upwell – Land north west of Townley Close	Object	We continue to have concerns regarding the allocation of this site in terms of its historic environment impacts. It adjoins Upwell Conservation Area and is a short distance to the south of the Grade II* listed Welle Manor Hall (only referred to as Grade II in paragraph G104.10). There is also the Grade II listed war memorial immediately to the south-west on the other side of New Road. The site forms part of the gateway into the conservation area along New Road and the	Amend reference to Welle Manor to grade II* in paragraph 12.21.1.5	<i>Made the suggested change to the supporting text.</i>  <i>Upwell Neighbourhood Plan is currently at the decision stage.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
			<p>approach to Welle Manor Hall. The policy refers to the conservation area which is welcomed.</p> <p>We note that the site was allocated in the previous plan and now benefits from full planning permission.</p>		
424	Policy G104.2 Upwell – Land south/east of Townley Close	-	No comments		<i>Noted</i>
425	Policy G104.3 Upwell – Land at Low Side	Object	<p>Whilst there are no designated heritage assets within the site boundary, the Upwell Conservation Area lies to the west of the site. This is a sensitive site on the edge of Upwell Conservation Area. There is currently no development on the east side of Low Side, with open views to countryside from the conservation area and historic buildings. Even just five dwellings in this location could harm the significance and setting of the conservation area. Whilst we welcome reference to the conservation area in the policy and</p>	<p>The policy would be improved by using the words preserve and enhance the conservation area and its setting.</p> <p>Given the sensitivity of the site and the fact that no permission has yet been granted for this site, we suggest that the opportunity should be taken for the site to be deleted and the dwelling provision</p>	<p><b>It has been found sound at the Local Plan examination and adopted. It is owned by the Upwell PC and through their neighbourhood plan they have sought to extend this significantly. The Upwell NP has been through the examination process and this. Once the Upwell Neighbourhood Plan has</b></p>

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			<p>the supporting text, it would be better to allocate an alternative site/s, as there are less sensitive locations in Upwell and Outwell.</p> <p>Based on the above concerns, we feel that the Plan is unsound as the site is not justified in terms of heritage impacts and reasonable alternative sites, nor effective or deliverable against considerable heritage constraints and not consistent with national policy. It would cause harm to the significance of several heritage assets and not comply with the NPPF including paragraphs 8c (protecting and enhancing the historic environment as part of the environmental objective of the planning system), 185 (Local Plans setting out a positive strategy for the historic environment) and 32 (avoid adverse impacts on the environment).</p> <p>Whilst we appreciate that this site has been previously allocated, the opportunity should be taken for the site to be deleted and the dwelling provision relocated elsewhere in Upwell and Outwell where there are fewer heritage issues</p>	<p>relocated elsewhere in Upwell and Outwell where there are fewer heritage issues.</p>	<p><b>been agreed that it can progress to the referendum</b></p>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
426	Policy G104.4 Upwell – Land off St Peter's Road	Object	This site is located partly within Upwell Conservation Area, with the majority of it lying beyond the conservation boundary to the south. We have previously raised concerns regarding the impact of development on the significance of the conservation area and indeed continue to have concerns. However, we note that the site now benefits from full planning permission. We welcome the reference to the Conservation Area in the policy		<b>No further action- large majority of this site has been built out.</b>
428	Policy G104.5 Outwell – Land at Wisbech Road	-	No comments		<i>No comment</i>
432	Policy G104.6 Outwell – Land Surrounding Isle Bridge	-	No comments		<i>No comment</i>
436	Policy G109.1 Walpole St Peter – Land south of Walnut Road	Object	Whilst there are no designated heritage assets on this site, a grade II listed building lies to the north of the site. Any development of the site has the potential to affect the setting of this listed building. Therefore reference should be made in the policy and the supporting text to the need to preserve the setting of this listed building.	Reference should be made in the policy and the supporting text to the need to preserve the setting of the listed building.	<i>Noted- This has been done.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
437	Policy G109.2 Walpole St Peter – Land south of Church Road	-	No comments		<i>No comment</i>
438	Policy WSA1 Walpole St Andrew Land south of Wisbech Road	Object	Whilst there are no designated heritage assets on this site, a grade II listed building lies to the west of the site. Any development of the site has the potential to affect the setting of this listed building. Therefore reference should be made in the policy and the supporting text to the need to preserve the setting of this listed building.	Reference should be made in the policy and the supporting text to the need to preserve the setting of the listed building.	<i>This policy has been taken out of the LPR</i>
443	Policy WEW1 West Walton Land north of School Road	-	No comments		<i>No comment</i>
445	Policy LP37 Rural Areas	Support	We welcome criterion 11 of this policy.		<i>Welcome the support</i>
455	Policy G28.1 Denver – Land South of Sluice Road	Support	Whilst there are no designated heritage assets within this site, a grade II listed Manor Farmhouse lies directly adjacent to the site. Development of the site therefore has the potential to impact the setting of this listed building. We note that reference is made to the listed building within the policy which is welcomed.		<i>No comment</i>

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459	Policy G33.1 East Winch – Land South of Gayton Road	-	No comments		<i>No comment</i>
462	Policy G36.1 Fincham – Land East of Marham Road	Comment	The Fincham Conservation Area lies to the south of the site but is separated by some buildings. We note that this site benefits from outline planning permission for 5 dwellings.		<i>No comment</i>

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467	Policy G421 Great Bircham and Bircham Tofts – Land Adjacent to 16 Lynn Road	-	No comments		<i>No comment</i>
470	Policy G45.1 Harpley – Land at Nethergate Street/School Lane	Support	We welcome the requirement for an archaeological field evaluation.		<i>Noted.</i>
473	Policy G48.1 Hilgay – Land south of Foresters Avenue	Support	We welcome the requirement for an archaeological desk based assessment.		<i>Noted</i>



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476	Policy G49.1 Hillington – Land to the South of Pasture Close	Support	We note that it is proposed to de-allocate this site from the Local Plan. Given the potential archaeological constraints together with the potential impact on the setting of Up Hall, Historic England would welcome the de-allocation of the site.		<i>Noted</i>
480	Policy G52.1 Ingoldisthorpe – Land opposite 143161 Lynn Road	-	No comments		<i>No comment</i>
485	Policy G72.1 Runcton Holme – Land at School Road	-	No comments		<i>No comment</i>

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489	Policy G78.1 Sedgeford – Land off Jarvie Close	-	No comments		<i>No comment</i>
493	Policy G81.1 Shouldham – Land South of No 1 New Road	-	No comments		<i>No comment</i>

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494	Policy G81.2 Shoudham – Land accessed from Rye’s Close	-	No comments		<i>No comment</i>
499	Policy G91.1 Syderstone – Land West of No 26 The Street	-	No comments		<i>No comment</i>
502	Policy G92.1 Ten Mile Bank – Land off Church Road	-	No comments		<i>No comment</i>
508	Policy G96.1 Three Holes – Land adjacent to ‘The Bungalow’ Main Road	-	No comments		<i>No comment</i>
512	Policy G97.1 Tilney All Saints – Land between School Road and Lynn Road	-	No comments		<i>No comment</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
518	Policy G106.1 Walpole Highway – Land East of Hall Road	-	No comments		<i>No comment</i>
522	Policy G120.1 Walton Highway – Land adjacent to Common Road	-	No comments		<i>No comment</i>
523	Policy G120.2 Walton Highway – Land North of School Road	-	No comments		<i>No comment</i>
527	Policy G113.1 Welney – Former Three Tuns/Village Hall	-	No comments		<i>No comment</i>
528	Policy G113.2 Welney – Land off Main Street	Object	The site adjoins the Grade II* listed Church of St Mary the Virgin, the only designated heritage asset within the village. We are concerned that development on a site as large as this could have a negative effect on the significance of the church through change within its setting. There is currently little development between the church and New Road to the north, which provides the church with an open setting and allows it to be viewed	Delete site.  If maintaining allocation, change conserve to preserve.	<i>Noted/ We will make changes to 'preserve'.</i>  <i>No further action.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
			<p>as one travels through the village (bearing in mind it is not a particularly big or tall church). Views of the church from the countryside to the west are also important. There has been unsympathetic cul-de-sac development to the south of the church on Taymor Place, and we would wish to avoid further harm.</p> <p>It may be possible to accommodate limited development fronting Main Street, but we would resist development that extends behind Main Street in a cul-de-sac form.</p> <p>As currently drafted, the plan is unsound in terms of its effectiveness, deliverability and consistency with national policy. The Planning Practice Guidance states “where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the ‘what, where, when and how’ questions)” (PPG Reference ID: 12-010-20140306 (last revised 06/03/2014). Paragraph 16d of the NPPF also states that only policies that provide a clear indication of how a decision maker should react to a</p>		

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			<p>development proposal should be included in the plan. Protecting and enhancing the historic environment is a strand of the environmental objective of the planning system (Paragraph 8c) and Local Plans should set out a positive strategy in this respect (Paragraph 185).</p> <p>Notwithstanding our continued concerns regarding this site, we welcome the reference in the policy to the church although the policy would be further improved by the use of preserve in line with the legislation for listed buildings.</p> <p>We note that the site was allocated in the previous plan and indeed benefits from full planning permission.</p>		

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532	Policy G114.1 Wereham – Land to the rear of 'Natanya' Hollies Farm, Flegg Green	-	No comments		<i>No comment</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
537	Policy G123.1 Wiggenhall St Germans – Land North of Mill Road	-	No comments		<i>No comment</i>
540	Policy G124.1 Wiggenhall St Mary Magdalen – Land on Mill Road	-	No comments		<i>No comment</i>
	Glossary	Object	Add scheduled monument, We would refer to Registered Parks and Gardens (NPPF term) and of course, we are now known as Historic England rather than English Heritage	Add scheduled monument, Refer to Registered Parks and Gardens and change English Heritage to Historic England.	<i>Noted/ Will make the changes of adding the definitions. The NPPF Term referred to for Registered Parks and Gardens falls under 'designated heritage asset' in the NPPF 2019 – this has been referred to in the updated glossary.</i>  <i>Scheduled monument has been added and defined from the HE Website</i>  <i>The correct reference has been updated from English Heritage to Historic England</i>

