

## **A12-3b – Email exchanges between Holland Lloyd (for Homes England) and Borough Council – 17 September 2021 – 29 March 2022**

### **RE: BCKLWN Local Plan Review - Draft Statement of Common Ground**

Good Morning

Many thanks for getting back to me. We are looking to submit the Local Plan Review today, so I will add your email below to the list of supporting documents.

In the case of Homes England we will submit the Statement of Common Ground as a draft (supported by this email trail), which we can replace by a final/ confirmed Statement (as soon as this is available). This is the approach that we are taking with other bodies; e.g. Historic England.

Meanwhile, many thanks for the update and I look forward to hearing back from you further in due course.

Regards and best wishes

Michael Burton  
Principal Planner  
Planning Policy, Planning and Environment  
Borough Council of King's Lynn and West Norfolk  
Tel: 01553 616573  
[www.west-norfolk.gov.uk](http://www.west-norfolk.gov.uk)

**From:**

**Sent:** 29 March 2022 09:26

**To:**

**Cc:** Planning Policy email <[planning.policy@west-norfolk.gov.uk](mailto:planning.policy@west-norfolk.gov.uk)>

**Subject:** Re: BCKLWN Local Plan Review - Draft Statement of Common Ground

Good morning,

I have spoken with Reece this morning and the SoCG is with Homes England for formal sign-off. I understand this process can take up to a week due to their internal process, but the document should be coming back to you soon.

Apologies for the delay and we will keep you up to date should we not receive the document before next Tuesday.

Kind regards,

Ben

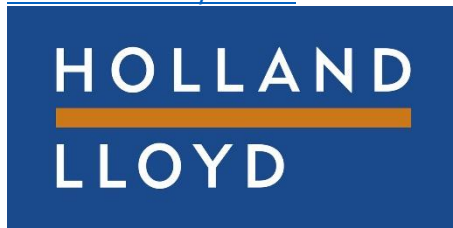
Director

01543 713021

07932 723428

[ben@hollandlloyd.co.uk](mailto:ben@hollandlloyd.co.uk)

[www.hollandlloyd.co.uk](http://www.hollandlloyd.co.uk)



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**From:** Michael Burton <[Michael.Burton@West-Norfolk.gov.uk](mailto:Michael.Burton@West-Norfolk.gov.uk)>

**Date:** Friday, 18 March 2022 at 14:33

**To:** Reece Croghan <[reece.croghan@thomaslister.com](mailto:reece.croghan@thomaslister.com)>

**Cc:** Planning Policy email <[planning.policy@west-norfolk.gov.uk](mailto:planning.policy@west-norfolk.gov.uk)>, Stuart Ashworth <[stuart.ashworth@west-norfolk.gov.uk](mailto:stuart.ashworth@west-norfolk.gov.uk)>, Ben Rayner <[ben@hollandlloyd.co.uk](mailto:ben@hollandlloyd.co.uk)>

**Subject:** FW: BCKLWN Local Plan Review - Draft Statement of Common Ground

Good afternoon

Further to my email below, we are looking to submit the Local Plan Review to the Secretary of State at the end of this month (by **31<sup>st</sup> March 2022**). As part of this process we are seeking to resolve the issue of Statements of Common Ground (SoCG) between statutory Duty to Cooperate consultation bodies (including Homes England) and the Borough Council.

In order to facilitate the submission of the Plan, I ask that you once again review the draft SoCG (attached), regarding the site specific proposal (land at Wisbech Road, South Lynn) that Homes England is promoting (as an interested partner).

Please confirm that you are happy to approve the SoCG or inform me of any changes that you wish to make by Wednesday, **23<sup>rd</sup> March**. I look forward to hearing from you by then, but please do not hesitate to get back to me if you have any further queries.

Regards and best wishes

Principal Planner  
Planning Policy, Planning and Environment  
Borough Council of King's Lynn and West Norfolk  
Tel: 01553 616573

[www.west-norfolk.gov.uk](http://www.west-norfolk.gov.uk)

**From:**

**Sent:** 03 March 2022 10:09

**To:**

**Cc:** Planning Policy email <[planning.policy@west-norfolk.gov.uk](mailto:planning.policy@west-norfolk.gov.uk)>

**Subject:** BCKLWN Local Plan Review - Draft Statement of Common Ground

**Importance:** High

Good Morning

Further to my email below, I spoke with Ben yesterday to discuss the Statement of Common Ground (see email below), between Homes England and the Borough Council. Ben has explained that it is easier to direct my correspondence to you (for Thomas Lister), who are in charge of marketing the land that Homes England are seeking to promote as an additional site allocation in the Local Plan Review (Wisbech Road, South Lynn). Given the tight timeframe that we are working to, it is important that we can reach agreement between Homes England and the Borough Council by **10<sup>th</sup> March** (next week).

Ben has explained that Homes England are keen to see the site specifically allocated for development, which provides additional reassurance to prospective developers. A previous (December 2020) pre-application enquiry that was dealt with by my colleague, Helen Morris, accepted the principle of residential development on the site.

In light of my conversation with Ben yesterday, I have modified the draft Statement of Common Ground (attached; see tracked changes).

I ask that you confirm (on behalf of Homes England) that you are happy to sign up to the modified Statement of Common Ground, by **10<sup>th</sup> March** (next Thursday).

Please do not hesitate to get back to me if you have any further queries.

Regards and best wishes

Principal Planner  
Planning Policy, Planning and Environment  
Borough Council of King's Lynn and West Norfolk  
Tel: 01553 616573  
[www.west-norfolk.gov.uk](http://www.west-norfolk.gov.uk)

**From:**

**Sent:** 16 February 2022 11:44

**To:**

**Cc:** Planning Policy email <[planning.policy@west-norfolk.gov.uk](mailto:planning.policy@west-norfolk.gov.uk)>

**Subject:** RE: Local Plan Review Pre-Submission Consultation (September 2021) Representation  
**Importance:** High

Good Morning

I write with reference to your representations on behalf of Homes England (represented by Holland and Lloyd; covering email below), for the Regulation 19 consultation for the Local Plan Review (August/ September 2021). We are now nearing a position where we will soon be ready to submit the Local Plan to the Secretary of State.

One particular outstanding requirement that has been in place since the 2018 NPPF update is the need to submit one or more statements of common ground (SoCGs); to identify areas of agreement between Duty to Cooperate (DtC) bodies (Town and Country Planning (Local Planning) (England) Regulations 2012, Part 2: <https://www.legislation.gov.uk/ukxi/2012/767/part/2>) and the Borough Council, and how outstanding/ unresolved objections by these organisations are to be dealt with.

Accordingly, we have reviewed Homes England's representation (Schedule of Comments, attached) and prepared a response to this, which we have incorporated into a draft SoCG (attached). Briefly, we have considered and responded to the various issues raised by Homes England, but do not consider that this raises any concerns regarding the overall soundness of the Local Plan Review (Pre-Submission Draft version, as agreed by the Borough Council, 8<sup>th</sup> July 2021). Therefore, we consider that these could be addressed, post submission of the Local Plan Review, by way of:

- Additional Modifications (AMs) – minor amendments (e.g. grammatical and/ or factual corrections) of no material consequence for the direction or soundness of the Plan; or
- Main Modifications (MMs) – proposed changes (e.g. to policy wordings) that represent a material amendment to the direction of the Plan and which will therefore need to be subject to MM consultation in the aftermath of the examination hearings (autumn 2022).

I ask that you review the draft SoCG and let me have any thoughts or comments that you may have in response. Please respond by email and/ or (if you prefer), please let me know if you would like me to set up a meeting later this month to discuss the SoCG further. In any event, please provide feedback by **Tuesday, 1<sup>st</sup> March at the latest**, so that we can finalise the SoCG by **Friday, 4<sup>th</sup> March**.

At this stage we consider that an officer level agreement for the SoCG is appropriate, given that the Homes England (agent: Holland and Lloyd) has not raised any fundamental issues regarding the soundness of the Plan. I look forward to hearing back from you in due course and hope that we can agree the SoCG to allow timely submission of our Local Plan Review. Please do not hesitate to get back to me if you need to discuss this email or the SoCG further.

Regards and best wishes

Principal Planner  
Planning Policy, Planning and Environment  
Borough Council of King's Lynn and West Norfolk  
Tel: 01553 616573  
[www.west-norfolk.gov.uk](http://www.west-norfolk.gov.uk)

**From:**

**Sent:** 17 September 2021 09:20

**To:** Planning Policy email <[planning.policy@west-norfolk.gov.uk](mailto:planning.policy@west-norfolk.gov.uk)>

**Cc:**

**Subject:** Local Plan Review Pre-Submission Consultation (September 2021) Representation

**Importance:** High

Dear Planning Policy,

Please find enclosed a completed 'representation form' and covering letter (both within single document) in response to the Pre-Submission Consultation of the Local Plan Review.

Holland Lloyd is acting as agent on behalf of Homes England and we would welcome updates on the plan to be shared with us (via this email) as the Plan progresses.

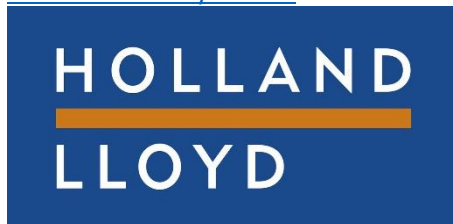
Please may you confirm receipt of this representation.

Kind regards,

Ben

Director

[www.hollandlloyd.co.uk](http://www.hollandlloyd.co.uk)



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