

## **A12-5b: Email exchanges between Norfolk County Council and BCKLWN, 17 September 2021 – 18 March 2022**

### **RE: Local Plan Reg 19 Consultation - Borough Council response to Norfolk County Council representation (draft Statement of Common Ground)**

FAO Highway Authority/ Lead Local Flood Authority

Good afternoon

I write with reference to our earlier email exchanges and discussions regarding the draft Statement of Common Ground (SoCG) for our Local Plan Review. Firstly, I wish to thank you both for all of your help and support in getting the Statement of Common Ground ready. I have now incorporated all of your comments/ feedback into a final draft “clean copy” version (attached).

As the lead officers for each, I ask that you each sign the document (an electronic signature is fine for these purposes). I would emphasise that an **officer** level signature is ok. Please note that we are looking to submit the Local Plan Review to the Secretary of State at the end of this month.

The SoCG is intended to provide a framework to allow us to submit the Local Plan Review by the end of this month and allow for detailed discussion regarding the detailed content (over the summer months, between submission and the examination hearings which are anticipated to take place during autumn 2022). So, in no way is this the “final word”; instead, it is a means to allow us to progress the Local Plan.

However, please let me know by Wednesday next week (**23<sup>rd</sup> March**) if there are any issues around you signing the document (e.g. if you require a signature from a more senior officer). Similarly, please let me know if you have any further queries.

Otherwise, I look forward to hearing from you soon and in working with you both in future as we agree any detailed changes to the Local Plan Review following submission.

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:** 15 March 2022 10:30

**To:**

**Cc:**

**Subject:** RE: Local Plan Reg 19 Consultation - Borough Council response to Norfolk County Council representation (draft Statement of Common Ground)

Hi Michael,

Apologies, I had intended to contact you earlier.

Please find attached for your consideration, the SoCG with some suggested edits to the Terrington Site.

Kind regards,

**Engineer Major and Estate Development**

Community and Environmental Services

Tel: 01603 223272

County Hall, Martineau Lane, Norwich, NR1 2SG



Norfolk County Council



**From:**

**Sent:** 03 March 2022 15:55

**To:**

**Cc:**

**Subject:** RE: Local Plan Reg 19 Consultation - Borough Council response to Norfolk County Council representation (draft Statement of Common Ground)

Michael

Thanks for your email.

Dave – I appreciate you've been in Examination hearings this week – but could you take a look at the email below and attached (Michael assume this is the most up to date SoCG?) – and feed-back any comments to Michael and CC me.

Thanks

Stephen

**From:**

**Sent:** 03 March 2022 15:09

**To:**

**Cc:**

**Subject:** FW: Local Plan Reg 19 Consultation - Borough Council response to Norfolk County Council representation (draft Statement of Common Ground)

**Importance:** High

**WARNING:** External email, think before you click!.

Hello

As discussed during the NSPG meeting, I am re-sending the draft SoCG between NCC (Highway Authority/ Lead Local Flood Authority). For her part, Sarah has confirmed that she is happy with the updated document. However, it would be helpful if we receive similar feedback from you (on behalf of the Highway Authority) regarding the site allocations at Marham and Terrington St Clement.

Briefly, we are asking whether you are happy to confirm that we can agree additional criteria re means of access (pedestrian/ vehicular) for the sites.

Please confirm that you are ok with this. Many thanks.

Regards and best wishes

Principal Planner

Planning Policy, Planning and Environment

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**From:**

**Sent:** 02 March 2022 14:52

**To:**

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

**Subject:** RE: Local Plan Reg 19 Consultation - Borough Council response to Norfolk County Council representation (draft Statement of Common Ground)

**Importance:** High

Hello

Thank you for meeting me this morning. It was a useful discussion and has allowed me to amend and refine the draft Statement of Common Ground (SoCG) between the County Council (Highway Authority/ Lead Local Flood Authority) and the Borough Council. I have now considered your comments and prepared a revised version of the SoCG document, which I hope addresses your concerns.

Please let me know if you need to discuss this further. Otherwise I look forward to hearing back from you with any further thoughts, comments or changes to the document, by 10<sup>th</sup> March (as agreed).

Thank you again for your helpful comments.

Regards and best wishes

Principal Planner

Planning Policy, Planning and Environment

Borough Council of King's Lynn and West Norfolk

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**From:**

**Sent:** 22 February 2022 12:16

**To:**

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

**Subject:** RE: Local Plan Reg 19 Consultation - Borough Council response to Norfolk County Council representation (draft Statement of Common Ground)

Hello

Thank you for getting back to me so promptly about this. 10<sup>th</sup> March would be ok for us to receive the finalised version of the SoCG. However, in order to save time, would you like me to set up an MS Teams meeting (1/2 – 1 hour max) that would

allow us to go through the SoCG and give you (as a key partner) the reassurance that you need for this?

Are you available some time next week for this purpose? Please let me know your availability so we can set this up.

I look forward to hearing back from you about this.

Thanks again.

Regards and best wishes

Principal Planner

Planning Policy, Planning and Environment

Borough Council of King's Lynn and West Norfolk

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**From:**

**Sent:** 22 February 2022 11:35

**To:**

**Subject:** RE: Local Plan Reg 19 Consultation - Borough Council response to Norfolk County Council representation (draft Statement of Common Ground)

Hello

Can I get a response to you by 10<sup>th</sup> March at the latest? If I can do it sooner I will try.

Thank you

Kind regards

**Strategic Flood Risk Planning Officer**

Community and Environmental Services

Tel: 0344 800 8020

The LLFA Teams are working remotely in response to COVID-19 health advice. The teams will be available by email and Teams. If you wish to speak to one of us, please email us at the addresses shown below and we will endeavour to contact you.

Email: [llfa@norfolk.gov.uk](mailto:llfa@norfolk.gov.uk) for any pre-planning or statutory consultee enquiries

Email: [water.management@norfolk.gov.uk](mailto:water.management@norfolk.gov.uk) for any reports of flooding, watercourse regulation or general enquiries

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Disclaimer

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

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**From:**

**Sent:** Tuesday, February 22, 2022 8:45 AM

**To:**

**Cc:**

**Subject:** RE: Local Plan Reg 19 Consultation - Borough Council response to Norfolk County Council representation (draft Statement of Common Ground)

Thanks

Just on a point of detail – I've had a look through the draft SoCG, and note that the concerns expressed by both the (1) Highway Authority; and (2) the LLFA – you (KLWN BC) propose to deal with through:

- (a) Additional Modifications (AMs); OR
- (b) Main Modifications (MM).

Do you propose that the AMs as well as the MMs will be subject to consultation after the Examination Hearings?

(NB I note the MMs will be subject to consultation after the Examination Hearing).

Thanks

**From:**

**Sent:** 21 February 2022 13:54

**To:**

**Cc:**

**Subject:** RE: Local Plan Reg 19 Consultation - Borough Council response to Norfolk County Council representation (draft Statement of Common Ground)

**WARNING:** External email, think before you click!.

Thanks

That is absolutely fine. Please let me know if you would like me to set up a meeting to finalise the Statement of Common Ground (say, w/c 7<sup>th</sup> March)? Otherwise, we would be perfectly happy with a review of the document, incorporating any comments/ tracked changes that you would like to see made.

Thanks again for getting back to me so promptly.

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:** 21 February 2022 12:28

**To:**

**Subject:** RE: Local Plan Reg 19 Consultation - Borough Council response to Norfolk County Council representation (draft Statement of Common Ground)

Michael

Having just spoken with the LLFA they will need an Extension of Time until the end of next week (4/3/22); given their current ongoing work on other major projects; and their involvement/work in responding to the recent storms impacting on Norfolk.

Thanks

Stephen

**From:**

**Sent:** 21 February 2022 11:12

**To:**

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

**Subject:** RE: Local Plan Reg 19 Consultation - Borough Council response to Norfolk County Council representation (draft Statement of Common Ground)

**WARNING:** External email, think before you click!.

Thanks Stephen

Apologies for the short notice on this occasion. The matter of Statements of Common Ground (SoCGs) was raised by our Programme Officer as a key point that needed addressing prior to submission of the Plan. The Environment Agency submitted a strong objection to the continued allocation of the former Del Monte Factory site (Bankside, West Lynn), but we have systematically produced similar SoCGs for other statutory Duty to Cooperate consultation bodies who submitted representations at the Regulation 19 consultation stage.

As stated, we anticipate resolution of matters raised in the County Council's representation through Main Modifications, post-submission. However, we ideally need your confirmation (through the SoCG) that you (at an officer level) are happy to endorse this approach.

I look forward to hearing back from Dave and Sarah further and hope we can resolve this in a timely manner.

Regards and best wishes

Principal Planner

Planning Policy, Planning and Environment

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**From:**

**Sent:** 21 February 2022 10:57

**To:**

**Subject:** RE: Local Plan Reg 19 Consultation - Borough Council response to Norfolk County Council representation (draft Statement of Common Ground)

Thanks

I've asked Dave (Highways) and Sarah (LLFA) to get back to you direct and cc me in on any response given the very short notice/deadline below.

Kind regards

Stephen



**Principal Planner**

**Community and Environmental Services**

**Telephone: 01603 222752**

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**From:**

**Sent:** 16 February 2022 09:43

**To:**

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

**Subject:** Local Plan Reg 19 Consultation - Borough Council response to Norfolk County Council representation (draft Statement of Common Ground)

**Importance:** High

**WARNING:** External email, think before you click!.

Good Morning

I write with reference to your representations on behalf of Norfolk County Council (Highway Authority and Lead Local Flood Authority; 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 Norfolk County Council's representations (Schedule of Comments, attached) and prepared a response to these, which we have incorporated into a draft SoCG (attached). Briefly, we have considered and responded to the various issues raised in the County Council's representations, but do not consider these raise 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 County Council (Highway Authority and/ or Lead Local Flood Authority) 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

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**From:**

**Sent:** 17 September 2021 07:49

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

**Cc:**

**Subject:** Norfolk County Council - Response to Local Plan Reg 19 Consultation

FAO Local Plan Team

Please find attached Norfolk County Council's response to the above Local Plan Consultation.

The following documents are attached:

- (a) Schedule of Comments;
- (b) Appendix – Councillor Kemp's Detailed Comments;
- (c) Representation Form – Policy LP05 (Planning Obligations);

- (d) Representation Form - Policy MAR1 (Marham);
- (e) Representation Form – Policy TSC1 (Terrington St Clements);
- (f) Representation Form – Policy G93-3 (Terrington St Clements);
- (g) Representation Form – Development Boundaries;
- (h) Representation Form – Policies LP06; LP09; and LP17;

If you have any queries with the comments submitted please contact either myself; or the named contact included in the attached Schedule of Comments.

The County Council may make further comments before the end of the consultation period.

Please could you acknowledge receipt of this email.

Kind regards

Stephen

**Principal Planner**

**Community and Environmental Services**

**Telephone: 01603 222752**

The Strategic Planning Team is working remotely in response to COVID-19 health advice. The team will be available by phone, email and Teams.

Please leave a voicemail if we are unable to answer your call and a member of the team will get back to you.

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