



Michael Burton
Kings Lynn and West Norfolk BC

Our ref:
PL43063

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20 July 2022

Dear Michael

**Kings Lynn and West Norfolk Local Plan Review – Sustainability Appraisal
Addendum Consultation July 2022**

Thank you for consulting Historic England on the Sustainability Appraisal Addendum. We recommend that you review our advice entitled Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment: <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/> which sets out how such documents should be produced in terms of heritage issues. We hope this provides useful information on areas such as relevant plans, baseline information, issues, objectives and indicators.

We have reviewed the Sustainability Appraisal Addendum and Non-Technical Summary July 2022.

We understand that most of the changes have been made in response changes made in relation to Natural England's comments and SOCG.

Main Report

Page 10 (Main Report) We note that the Addendum state that no changes have been made to the Historic Environment Policy. Whilst no changes have been made as yet, we understand that KLWN are working on a substantially revised policy for the Historic Environment with ourselves. We trust that this will be assessed in a further update of the Sustainability Appraisal to accompany the Schedule of Main Modifications in due course.

Page 25, Para 5.3 and Figure 5

Cumulative effects Para 5.3 would appear to aggregate the scores to give a cumulative impact. However, positive and negative scores for different sites do not





cancel each other out. Therefore, we would suggest avoiding this approach of summing the impacts.

Non-Technical Summary

P14 (NTS) para 3.5 Table Again, we would question the approach in the table. Aggregating the assessments in this way is not particularly helpful. Positive impacts for one site do not cancel out negative impacts elsewhere. We suggest you avoid this aggregated approach.

Conclusion

We would encourage you to work with local conservation officers, archaeology officers and local heritage community groups in the preparation of the Sustainability Appraisal. Our advice note provides more guidance to developing a robust sustainability appraisal framework.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

We hope that the above comments of assistance. Please let me know if you have any queries. We look forward to further engagement on the Local Plan review.

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