



Historic England

FAO: Local Plan evidence base consultation
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Our ref: PL00511471

18 October 2023

Dear Ms May

Kings Lynn Local Plan Additional Evidence Consultation October 2023

Thank you for consulting Historic England on the Kings Lynn Local Plan Additional Evidence. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully considered at all stages and levels of the local planning process. Therefore, we welcome the opportunity to comment on the consultation material.

We have now had the opportunity to review the documents and can provide the following substantive comments on documents F47, F51 and F51k.

F47 Topic Paper Spatial Strategy and Settlement Hierarchy

We still have some concern about lack of some brownfield sites being allocated in Kings Lynn while large greenfield site allocated at West Winch.

F51 Topic Paper West Winch April 2023

LVIA

The West Winch topic paper summarises the evidence and proposed modifications in relation to landscape at paragraphs 48 – 60. The LVIA itself is ED F51e Appendix 5. We broadly welcome the preparation of this additional evidence to support and justify the allocation.



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Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.





Landscape Character

We note that the LVIA concludes that the anticipated overall effects on local landscape would be slight to moderate adverse (para 5.11). In terms of cumulative effects, the assessment states that this would be the same level but felt over a wider area (para 5.13.)

Visual Effects

Visual effects are identified as ranging from slight to high adverse.

No assessment has been made of the potential visual effects from key heritage assets in this appraisal. We consider this to be an important omission from the appraisal.

Heritage Impact Assessment

The West Winch topic paper summarises the evidence and proposed modifications in relation to heritage at paragraphs 61 – 74. This includes a summary of the Heritage Impact Assessment (HIA).

Summary position

Historic England welcomed the preparation of the HIA in 2022. However, in our Statement of Common Ground, our hearing statement and our oral evidence at the EiP we stated that it is Historic England's view that the HIA is insufficient and the policy wording not detailed enough to provide sufficient protection for the historic environment. It is therefore disappointing that there has been no further HIA work and no additional proposals for the policy in relation to heritage since the adjournment of the hearings in January.

We set out in more detail our concerns and recommendations below.

Historic England's position and recommendations

Historic England has advised that a Heritage Impact Assessment (HIA) should be prepared for this site over several years.

Whilst we welcome the preparation of an HIA just in advance of the hearings, it is Historic England's view that the assessment was insufficient in some areas.

The HIA identifies harm to heritage assets. In particular for the land around the church, this included a high level of harm.

The HIA does not provide appropriate/sufficient recommendations with sufficient detail for mitigation and enhancement.

Historic England's Advice Note Site Allocations in Local Plans (referenced in Planning Practice Guidance Paragraph: 045 Reference ID: 61-045-20190315 Revision date: 15 03 2019) makes it clear that assessment should consider maximising enhancements and avoiding harm through (amongst other things) identifying design requirements including open space, landscaping, protection of key views, design, layout etc.





The advice note also states that allocation policy 'should be detailed enough to provide information on what is expected...Mitigation and enhancement measures identified as part of the site selection process and evidence gathering are best set out within the policy to ensure that these are implemented'.

Therefore, it is Historic England's view that the HIA is insufficient and the policy wording not detailed enough to provide sufficient protection for the historic environment.

We consider that the policy is **not justified** by an appropriate, sufficient proportionate evidence base, and the wording is **not effective** in securing sufficient protection for the historic environment and so is **not consistent with the NPPF**.

We understand that there has been no additional evidence work, such as refinement of recommendations in the HIA or revised policy wording in relation to heritage since the hearings

Whilst we acknowledge that the proposed main modifications set out in our SOCG with the Council represent an improvement on the previous wording for the policy in relation to heritage, they do not fully address our concerns as expressed at the Examination in Public.

At EiP Historic England highlighted our concerns in relation to the HIA and also set out our suggestions in relation to appropriate heritage mitigation that should be included in the policy.

In particular we explored the need for there to be an area protected from development around the church and the moated site and that this should be identified in the Local Plan

At EiP we also recommended the following heritage mitigation measures, in part based on some of the recommendations in the HIA at paragraphs 4.15,4.16 and 4.18 of the HIA but also based on site visits, and our own professional judgement.

Heritage buffer around the church and moated site (leaving the field to the east of the church, south west of church and east and south of the moat open and in pasture or informal open space). Strengthen landscaping along the eastern field boundary.

Maintaining key views of the church and mill from the site

Careful lower density design and planting in the area around the mill

Careful siting and buffering of new development around the Old Dairy Farmhouse.

Heritage interpretation

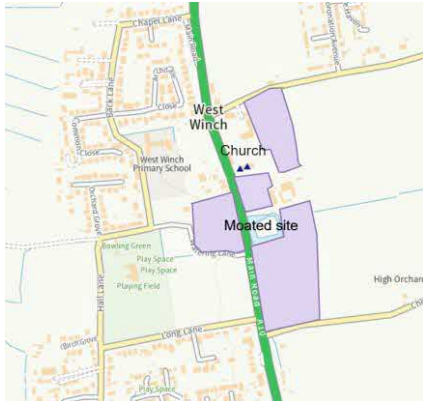
Conserve and enhance Green Dyke





We maintain our position and continue to advise that these requirements should be included in the policy wording for the site at criterion 7.

For clarity, the diagram below sets out the heritage buffer that we are recommending around the church and moated site.



The HIA also identified the moated site at Fincham's Manor to the south of the church to be of potentially schedulable quality and so should be treated as such. Therefore, we recommended to the Council that they put this site forward for assessment for scheduling. However, to date Historic England has not received an application. We continue to advise that this is undertaken to clarify the status of the moated site ahead of more detailed masterplanning and development.

F51k Appendix 11 Policy E2.1 with Proposed Main Modifications

As highlighted above in more detail, whilst we acknowledge that the proposed main modifications set out in our SOCG with the Council and in this document at criterion 7 on page 5 represent an improvement on the previous wording for the policy in relation to heritage, they do not fully address our concerns as expressed at the Examination in Public.

We advise that heritage mitigation and enhancement measures should be included in the policy wording for the reasons set out above.

We have set out our recommendations for mitigation and enhancement above and continue to advise that these should be included in criterion 7. Inclusion of the diagram showing the heritage buffer in the Local Plan would also be beneficial.





Closing comments

In preparation of the Local Plan, we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups.

We should like to stress that this response 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.

If you have any questions with regards to the comments made then please do get back to me. In the meantime, we look forward to continuing to work with you and your colleagues.

Yours sincerely

Debbie Mack
Historic Environment Planning Adviser

