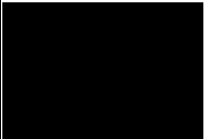


## Appendix A: Table of Historic England’s comments on the Proposed Modifications to the Kings Lynn and West Norfolk Local Plan

Mod. No.	Section	Sound/ Unsound	Comments	Suggested Change
MM49	New Policy – Historic Environment	Unsound	<p>We welcome the proposed changes to policy and supporting text for this policy on the historic Environment to ensure consistency with national policy in the NPPF and legislation.</p> <p>It is not entirely clear from the proposed modification which aspects are policy and supporting text. In our SOCG with the Council we had agreed some supporting text followed by policy wording in a text box and then further supporting text. This differentiation appears to have been lost in the proposed modification. We recommend careful consideration as to which aspects are policy and which are supporting text.</p> <p>We also recommend that you ensure the hyperlinks contained within the SOCG are including in the final wording for the supporting text and policy.</p> <p>The text states that there are 24 entries on the Heritage at Risk Register. There are now 25. Perhaps it would be helpful to amend to read 25 (2023 Heritage at Risk Register) as this number will inevitably change during the plan period.</p>	<p><i>We recommend careful consideration as to which aspects are policy and which are supporting text.</i></p> <p><i>We also recommend that you ensure the hyperlinks contained within the SOCG are included in the final wording for the supporting text and policy.</i></p> <p><i>Amend 24 to 25 (2023 Heritage at Risk Register)</i></p>
MM80	Policy E1.1 – Kings Lynn – Town Centre	Sound	Historic England welcomes the proposed modification to criterion 1f to ensure that policy is consistent with national policy in respect of heritage.	
MM83	Policy E1.3 –	Sound	Historic England welcomes the addition of sub-criterion 1	

Mod. No.	Section	Sound/ Unsound	Comments	Suggested Change
			c in relation to heritage assets, consistent with national policy.	
MM105	Policy E1.11	Unsound	<p>Southgates has been a long-term proposal in Kings Lynn for many years and was included in the Regulation 19 Draft of the Local Plan.</p> <p>We understand from the Council that they decided to delete the Southgates allocation last year due to questions raised regarding the deliverability of the site.</p> <p>However, <a href="#">ED 50b Appendix B – Updated Deliverability and Developability Document</a> states that ‘although delivery timescales are not fixed, the Council’s Property and Projects team have confirmed the site is planned to come forward within the next 5 years’. We also understand that plans for the Southgates project are still progressing.</p> <p>We are therefore surprised that the allocation is proposed for deletion. In our view the site should still be allocated in the Plan, albeit amended to reflect the Council’s latest proposals.</p> <p>If the site is not allocated then any future proposals for redevelopment will be contrary to the development plan.</p> <p>We recommend the Plan is amended to reflect the current proposals for the site.</p>	<p><i>Rather than delete the site, we recommend that the policy is amended to reflect the Council’s current proposals for the site.</i></p>

Mod. No.	Section	Sound/ Unsound	Comments	Suggested Change
MM117	Policy E2.1 West Winch Growth Area Strategic Policy Part B	Sound	Historic England welcomes the proposed modifications to criterion 7 in relation the heritage assessment, mitigation and enhancement. These changes are consistent with national policy and will help secure greater protection for the historic environment through the development of the West Winch Growth Area.	
MM122	Paragraphs 9.3.1.59 and 9.3.1.60 and new para and concept plan.	Sound	Historic England welcomes the proposed modifications to these paragraphs, including the addition of the Heritage Buffer Zone Concept Plan. These changes are consistent with national policy and will help secure greater protection for the historic environment through the development of the West Winch Growth Area.	
MM139	New Policy –  and its supporting text	Unsound	<p>We understand that this was not included as an allocation in the submission plan and therefore we did not comment on the site at the time.</p> <p>Instead it was referenced as a significant commitment for 24ha of employment uses, although it was not clear from the Plan precisely where the site was (para 10.1.3.2).</p> <p>We understand that the permission dates back to the 1990s and remains live by virtue of the initial development phase having been completed.</p> <p>We understand that in response to the MIQs, the Council has now agreed to include the site as an allocation.</p> <p>The site lies directly within a former WWII military airfield that was opened in 1942, and closed 1946. The airfield is a non-designated heritage asset.</p> <p>The site also lies close to a number of designated heritage assets. There is an important scheduled</p>	<p><i>We recommend that reference is made to the heritage assets in the new policy wording to ensure that any future application appropriately considers and responds to the heritage.</i></p> <p><i>We suggest the criterion reads: 'Development should protect and where appropriate enhance the significance of heritage assets including the Old Gatehouse scheduled monument, grade I listed Church and the former WWII airfield through careful layout and design and appropriate landscaping.'</i></p>

Mod. No.	Section	Sound/ Unsound	Comments	Suggested Change
			<p>monument (the old gatehouse at Bexwell Hall and grade II listed barn) situated just to the south side of the A1122 which forms part of medieval complex with the GII* listed church of St Marys as well as a grade II listed Bexwell Hall Farmhouse.</p> <p>We also note the SA assesses the site as having a negative impact on the historic environment although it states that ‘these impacts are not expected to be significant due to the existing employment sites adjacent to the allocation. The existing employment site separates the allocation from the designated heritage assets, therefore screening the view of the new allocation.’ The SA does not mention the non-designated airfield. The SA does not make any recommendations for mitigation.</p> <p>Given the presence of the non-designated airfield as well as the proximity of designated heritage assets, we recommend that reference is made to the heritage assets in the new policy wording to ensure that any future application appropriately considers and responds to the heritage.</p> <p>We suggest the criterion reads:</p> <p><i>‘Development should protect and where appropriate enhance the significance of heritage assets including the Old Gatehouse scheduled monument, grade I listed Church and the former WWII airfield through careful layout and design and appropriate landscaping.’</i></p>	
MM140	New Plan- New Site Downham	Unsound	See comments above in relation to the proposed employment allocation at Bexwell.	

Mod. No.	Section	Sound/ Unsound	Comments	Suggested Change
SA	4.2.2 Page 36	Unsound	<p>We also note the SA assesses the site as having a negative impact on the historic environment although it states that ‘these impacts are not expected to be significant due to the existing employment sites adjacent to the allocation. The existing employment site separates the allocation from the designated heritage assets, therefore screening the view of the new allocation.’</p> <p>The SA does not mention the airfield which we understand is a non-designated heritage asset.</p> <p>The SA does not make any recommendations for mitigation.</p> <p>We recommend that the SA should reference the airfield which we understand is a non-designated heritage asset.</p> <p>We also recommend that the Sa should make reference to mitigation. This might include careful design and layout and landscaping.</p>	<p><i>We recommend that the SA should reference the airfield which we understand is a non-designated heritage asset.</i></p> <p><i>We also recommend that the Sa should make reference to mitigation. This might include careful design and layout and landscaping.</i></p>
AM12	2.2.3	Comment	Delete ‘ancient’. The current preferred NPPF terminology is Scheduled Monuments as not all scheduled monuments are ancient.	<i>Delete ‘ancient’.</i>
AM40	5.7.4 – 5.7.8	Unsound	The HAZ is not an on-going initiative. Suggest alternative wording to more accurately reflect current status.	<i>Suggest alternative wording re HAZ to more accurately reflect current status.</i>