

Responses to Inspector's Notes to the Council (9th and 14th July 2015) – Clarification of, and Revisions to, the SADMP Objectives and the Sustainability Appraisal.

1. Introduction

1.1 The Examination into the SADMP adjourned on 7 July and the Inspector outlined a number of issues to which he required responses. In response to the Inspector's notes dated 9 and 14 July, the Council has clarified their approach to the Sustainability Appraisal, and identified how their objectives contribute towards the site selection process. The Council has also revised the Sustainability Appraisal in the light of proposed modifications to the Plan, which are outlined in the Council's Issue Statements and Response Notes.

1.2 This Response Note is divided into two parts. The first is a specific answer to the Inspectors question; and the second includes the summary of revisions to the SA itself.

2. Question 1 - Inspectors Note 2 (14 July)

Preparation of a Note regarding the objectives identified by the Council and how those objectives contributed towards the site selection process. How alternatives were identified and assessed and how compliance with the EIA Regulations has been approached¹.

2.1 Introduction

2.1.1 In this Note we set out how objectives were identified by the BCKLWN, how these informed the Site Sustainability Factors utilised within the SA process, the link between the CS Objectives and the SADMP and how both shaped the SADMP.

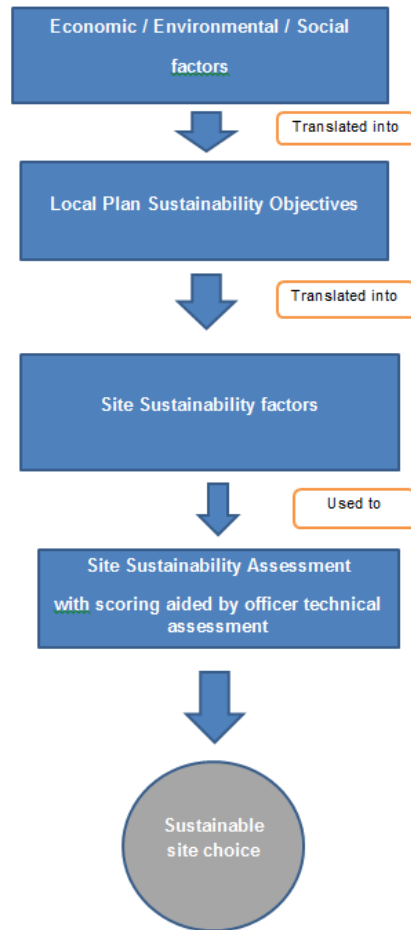
2.2 Core Strategy Objectives

¹ The Inspector clarified that EIA's are not a required component of plan-making and therefore the reference to EIA Regulations in Note 2 (point 1) can be disregarded.

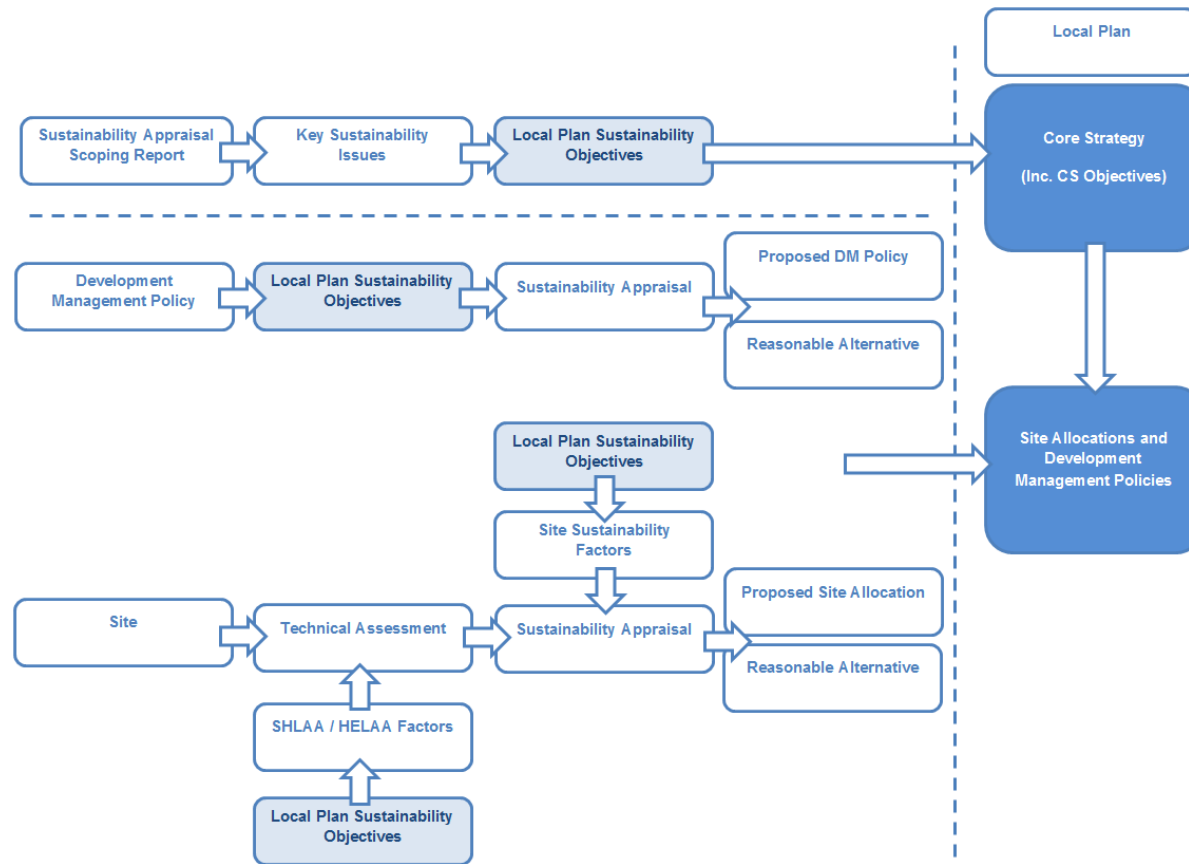
- 2.2.1 The King's Lynn and West Norfolk Core Strategy (CS) was adopted in July 2011. This provides strategic level guidance for growth and addresses significant issues across the Borough in the period to 2026. The CS forms one part of the Local Plan. It is the main document setting out the long term strategy, including the Vision and Objectives for the Borough and the broad policies that will steer and shape new development.
- 2.2.2 The Objectives for the Borough were derived from the identification of Key Sustainability Issues, taken from the Sustainability Scoping Report, 2005. These can be viewed on page 15 of the SA. The Key Sustainability Issues and Local Plan Sustainability Objectives informed The Core Strategy Objectives (pages 10 & 11 of the CS), and these in turn have shaped the SADMP.
- 2.2.3 The SADMP has been prepared to give the spatial detail below the higher level aspirations within the CS, and forms the second part of the Local Plan. It's policies will guide development in the Borough for the period up to 2026. The CS sets out the scale of growth and broad distribution for the Borough and the SADMP will allocate sites to help achieve this.
- 2.2.4 The SADMP, being the second part of the Local Plan, therefore does not have its own separate set of Objectives but appropriately the same Objectives as the CS.

2.3 Sustainability Appraisal Objectives

- 2.3.1 The diagram from Issue 3.2 Appendix 1 provides a flow chart diagram of the sustainability / site choice as a simplified outline. For convenience this is reproduced overleaf:



2.3.2 To illustrate the influence of the Local Plan Sustainability Objectives and CS Objectives within the overall process, the following flow chart diagram is provided:



- 2.3.3 The Local Plan Objectives (can be viewed on page 18 of the SA) feed into the CS and also the SADMP, and so directly influence the policy approach for site selection and development management policy selection. For example, the CS through policy CS02 identifies the Settlement Hierarchy for the Borough, and the SADMP utilises this, as described in the Distribution of Development chapter, D1. This influences the housing numbers sought for allocation in each settlement based upon CS02.
- 2.3.4 Sites submitted were assessed via the technical assessment, if not rejected the site was then assessed via the SA and classified as either a proposed allocation or a reasonable alternative. It is important to note that this process took place at the various stages of Plan preparation (Issues and Options & Preferred Options), in order to maintain a consistent approach. This relates to chapter 6 of the CS 'Policies for Places' and chapters E – G in the SADMP. The approach for both is entirely consistent given that the documents sit together to form the Local Plan.
- 2.3.5 The Local Plan Sustainability Objectives were identified at the start of the Core Strategy preparation process, and so have been used to assess policy options against throughout this plan-making process. In the case of site selection, it was felt that the Objectives were not ideally suited to comparing individual sites (as had been established of CS policies), and so a subsidiary set of 10 Site Sustainability Factors were developed. These can be viewed within the SA as can their relationship to the 20 Local Plan Objectives on page 21 and 23 respectively.
- 2.3.6 These 10 Site Sustainability Factors were used as a way of assessing the sites submitted to the authority for consideration (if they had not been rejected by the technical assessment) and they were used to balance the differing considerations to site selection. The technical assessment factors (pages 7 and 10 of the technical assessment),

were derived from the SHLAA/ HELAA assessment factors (page 31 and 34 of the HELAA) which in turn arose from the Local Plan Sustainability Objectives. The SA process strongly influenced/determined the decision-making process in determining if a site would be proposed for allocation or be classified as a reasonable alternative. So it is clear that there is a direct link/contribution from the Local Plan Sustainability Objectives and the Site Sustainability Factors.

2.3.7 The Council's Issue Statement 1.4 identifies the process of the SA in assessing the sites submitted for consideration, and includes further detail on the site selection process and criteria. The result of the SA was the identification of a proposed site for allocation and a set of reasonable alternatives for each settlement identified for growth. This process included several consultation periods at each stage of the plan, responses were received from landowners, individuals, community groups, Parish Councils, Statutory Consultees, etc. The SADMP process has provided the Council with over 1,300 sites for consideration. The assessment process described above, began at the Issues and Options Stage (2011) through the Preferred Options Stage (2013) and to the Pre-Submission Stage (2015).

2.3.8 The SA that accompanies the SADMP identifies all of the sites and development management policies that are proposed and those that are considered reasonable alternatives. It explains how they were all assessed and provides a commentary/discussion and a conclusion highlighting the reasons for the choices made.

3. Revisions to the Sustainability Appraisal

3.1 The Borough Council is required to provide assessments of the effect of its proposals on the sustainability of the Borough as a whole. This was done in respect of the Pre – Submission version of the Plan presented to the Examination as the 'Sustainability Appraisal Report'. Given that we are proposing to alter some of the policies / allocations in

that version of the Plan we need to update the Sustainability Appraisal Report accordingly.

3.2 The update to the Sustainability Appraisal Report has been given the following document title: '*Proposed Minor Modification to the Sustainability Appraisal Report Incorporating Strategic Environment Assessment for the Site Allocations and Development Management Policies Pre-Submission Document, August 2015*'. This is presented at Appendix 1.

3.3 The proposed minor modifications can be split into two categories, those that impact upon the Development Management Policies, and those that impact upon the Settlement / Site Policies:

- Development Management Policies, proposed modifications:
 - A new policy (DM 2A) for the early review of local plan;
 - An amendment to the Green Infrastructure policy (DM19).
- Settlement / Site Policies, proposed modifications:
 - Updated flood risk information for King's Lynn, Hunstanton and Terrington St. John housing policies;
 - A parcel of land removed from the West Winch Growth Area at the Preferred Options Stage is now proposed for allocation.

3.4 The proposed minor modifications to the Development Management Policies result in an increased overall positive effect when scored against the 20 Local Plan Sustainability indicators. The undertaking of an early review of the Local Plan, DM2A, clearly has a highly positive effect. DM19 was adjudged to have a positive effect previously and the proposed minor modification to this policy result in a higher positive score. Collectively, the positive (243) outweighs the negative (-26)

scores for proposed Development Management Policies including the proposed minor modifications. Therefore, overall the results illustrate a positive sustainability contribution for the Borough.

3.5 The proposed minor modifications to the Site and Settlement Policies result an increase of 4 to the overall positive scores of the Plan when appraised. However, there is an increase of 4 to the negative scores of the Plan. Overall, taking all site and settlement sustainability factors together, the positive scores (411) outweigh the negative (-206). This indicates that sites proposed for allocation to implement the Core Strategy provide gain in sustainability for the Borough.

3.6 We consider that the above approach and detailed changes, within Appendix 1, provide a pragmatic approach and display sufficient flexibility in response to the Inspector's questions.

Proposed Minor Modification to the Sustainability Appraisal Report Incorporating Strategic Environment Assessment for the Site Allocations and Development Management Policies Pre- Submission Document

August 2015

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Introduction

This document illustrates the proposed minor modifications to the Sustainability Appraisal Report Incorporating Strategic Environment Assessment for the Site Allocations and Development Management Policies Pre-Submission Document. It is important to note that this document should be read in conjunction the Sustainability Appraisal Report Incorporating Strategic Environment Assessment for the Site Allocations and Development Management Policies Pre-Submission Document 2015.

The proposed modifications can be split into two categories, those that impact upon Development Management Policies, A, and those that impact upon Site Policies, B.

A. Development Management Policies, proposed modifications:

- a new policy (DM 2A) for the early review of local plan
- an amendment to the Green Infrastructure policy (DM19)

B. Site Policies, proposed modifications:

- Updated flood risk information for King's Lynn, Hunstanton and Terrington St. John housing policies
- A parcel of land removed from the West Winch Growth Area at the Preferred Options Stage is now proposed for allocation

These modifications are presented in the table overleaf. How the modifications would be viewed within the Sustainability Appraisal Report itself, are then presented within the accompanying appendices.

The proposed minor modifications to the Development Management Policies result in an increased overall positive effect when scored against the 20 Local Plan Sustainability indicators. The undertaking of an early review of the Local Plan, DM2A, clearly has a highly positive effect. DM19 was adjudged to have a positive effect and the proposed minor modifications to this policy increase the positive scores. Collectively, the positive (243) outweighs the negative (-26) scores for proposed Development Management policies, including the proposed minor modifications. Therefore, overall the results illustrate a positive sustainability contribution for the Borough

The proposed minor modifications to the Site and Settlement Policies result an increase of 4 to the overall positive scores of the Plan when sustainable appraised. However, they also result in an increase of 4 to the negative scores of the Plan. Overall, taking all sustainability factors together, the positive scores (411) outweigh the negative (-206), indicating that sites proposed for allocation to implement the Core Strategy provide gain in sustainability for the Borough.

Table of Proposed Minor Modifications

SA Page Numbers	Policy	Issue	Proposed Amendment	Justification
A. DM Policies				
46	DM Policy overview	Incorrect indicator is mentioned	Replace with the correct indicator (See Appendix 5)	Ensure the accuracy of the document
New	New Policy DM2A – Early Review of Local Plan	This new policy will need to be presented in the SA with the other DM policies	Update the SA accordingly (See Appendix 1,2,3 &4)	To take account of an additional DM policy
61	DM19	A proposed amendment to this policy will need to be presented within the SA	Update the SA accordingly (See Appendix 1,2 &4)	To take into account the proposed modifications to DM19
B. Site Policies				
208	Hunstanton Housing Sites F2.4 (997)	The commentary of the site correctly identifies the flood risk, but the SA score for 'Flood Risk' is incorrect.	Change the Flood Risk Sustainability Factor score from '+' to '+/x'. (See Appendix 6,7,&8)	Accurately reflect the risk of flooding for site F2.4 in the SA table.
221	King's Lynn Housing Sites: E1.5 E1.6 E1.8 E1.10 E1.11	Risk to flooding not accurately presented within the SA	Change the Flood Risk Sustainability Factor scores as below: <ul style="list-style-type: none"> • E1.5 from '+/x' to 'xx' • E1.6 from 'xx' to '+/x' • E1.8 from 'x' to 'xx' • E1.10 from 'x' to 'xx' • E1.11 from 'x' to '+/x' And amend the site commentary accordingly (See Appendix 6,7&9)	Accurately reflect the risk of flooding for housing sites E1.5, E1.6, E1.8, E1.10 & E1.11 in the SA.

303	Terrington St John: G94.1	The commentary of the site correctly identifies the flood risk, but the SA score for 'Flood Risk' is incorrect.	Change the Flood Risk Sustainability Factor score from 'xx' to 'x'. (See Appendix 6,7 &10)	Accurately reflect the risk of flooding for site G94.1 in the SA table.
380	West Winch Growth Area	Update the SA to include Site 984, 1034 as allocated	Updated SA table and commentary as seen within appendix (See Appendix 6,7 &11)	To reflect the updated allocation

Development Management Policy Changes Appendices

Appendix 1: Amended Table 5.2a - Development Management Policies Options Scoring

Table 5.2a – Development Management Policies Options Scoring (Page 67)

Policy		SA Objective:																				
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	Overall Effect
DM 2A Early Review of Local Plan	Preferred Option																					
	No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral
	PP23 (DM 2A)	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	Positive
DM 19 Green Infrastructure	Preferred Option	++	0	++	+	+	0	0	++	++	0	++	++	0	++	++	++	0	+	0	+	Positive
	Option 1	+	0	x	+	+	0	0	+	x	0	x	~	0	~	x	x	0	x	0	x	Neutral
	PP10	++	0	++	+	+	0	0	++	++	0	++	++	0	++	++	++	0	+	0	+	Positive
	PP10 A (DM19)	++	0	++	++	++	0	0	++	++	0	++	++	0	++	++	++	0	+	0	+	Positive

Commentary

DM2 – Undertaking an early review of the Local Plan will clearly have a positive effect.

DM 19 – This Policy is judged to have a positive effect. The alternative would be no specific policy, relying on the National Planning Policy Framework and general planning principles, which is considered a ‘neutral’ option.

Appendix 2: Amended Table 5.2b - Combined and Aggregated Scores of Proposed (only) Development Management Policies

Table 5.2b - Combined and Aggregated Scores of Proposed (only) Development Management Policies (Page 72)

Policy		SA Objective:																				Overall Effect
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	
DM 1 Presumption in Favour of Sustainable Development	Proposed Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Not significant
DM 2 Development Boundaries	Proposed Policy	+	++	0	0	+/x	+/x	+/x	+	+	0	0	0	0	+/x	+	0	x	0	0	+	Positive
DM 2 A Early Review of Local Plan	Proposed Policy	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	Positive
DM 3 Infill Development in the SVAH's	Proposed Policy	x	xx	0	x	x	0	x	x	x	0	0	0	0	0	xx	0	+/x	++	x	x	Negative
DM 4 Houses in Multiple Occupation	Proposed Policy	0	~	+	0	0	0	+	++	0	~	0	+	+	0	0	+	+	0	++	++	Positive
DM 5 Enlargement of Dwellings in the Countryside	Proposed Policy	0	0	0	0	+	0	++	+	+	0	0	0	0	0	0	0	+/x	0	0	0	Positive

Policy		SA Objective:																				
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	Overall Effect
DM 6 Housing Needs of Rural Workers	Proposed Policy	++	0	+	0	0	0	+	+	++	++	0	+	++	0	0	0	++	0	++	++	Positive
DM 7 Residential Annexes	Proposed Policy	0	0	0	0	0	0	+	++	+	00	0	+	0	0	+	0	0	0	0	0	Positive
DM 8 Delivering Affordable housing on Phased Development	Proposed Policy	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	+	++	0	0	0	Positive
DM 9 Community Facilities	Proposed Policy	0	++	0	0	0	0	+	++	+	0	0	+	+	++	++	+	0	++	+	0	Positive
DM 10 Retail Development Outside Town Centres	Proposed Policy	+	+	0	0	0	0	++	++	++	0	0	0	0	0	++	0	0	+	0	+	Positive
DM 11 Touring and Permanent Holiday Sites	Proposed Policy	+/x	0	0	++	0	++	++	++	0	0	++	++	0	0	+	0	0	0	0	++	Positive
DM 12 Strategic Road Network	Proposed Policy	0	0	0	0	0	0	+	+/x	+/x	0	0	++	0	0	+/x	0	0	0	+	+/x	Positive
DM 13 Disused Railway Trackways	Proposed Policy	0	0	0	0	0	0	0	0	+	0	0	+	0	+	+	0	0	0	+	+/x	Positive

Policy		SA Objective:																				
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	Overall Effect
DM 14 Development Associated with CITB, Bircham Newton & RAF Marham	Proposed Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0	0	0	++	++	Positive
DM15 Environment, Design and Amenity	Proposed Policy	0	0	0	0	0	++	++	++	+	0	0	+	+	+	0	0	+	0	0	0	Positive
DM 16 Provision of Recreation Open Space for Residential Developments	Proposed Policy	0	0	0	0	0	0	0	+	0	0	0	+	0	++	++	0	0	+	0	0	Positive
DM 17 Parking Provision in New Development	Proposed Policy	0	0	0	0	0	0	#	+	0	0	0	0	0	0	+	0	0	0	0	0	Positive
DM 18 Coastal Flood Risk Hazard Zone (South Hunstanton to Dersingham)	Proposed Policy	0	0	0	0	0	0	0	++	0	0	++	++	0	0	0	0	0	0	0	0	Positive
DM 19 Green Infrastructure	Proposed Policy	++	0	++	++	++	0	0	++	++	0	++	++	0	++	++	++	0	+	0	+	Positive
DM20 Renewable Energy	Proposed Policy	0	0	0	+	+	+	++	+	+	0	0	0	0	0	0	0	0	0	0	0	Positive

Policy		SA Objective:																				Overall Effect	
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		
DM 21 Sites in Areas of Flood Risk	Proposed Policy	0	0	0	0	0	0	0	++	0	0	++	+	0	0	0	0	0	0	0	0	+	Positive
DM 22 Protection of Local Open Space	Proposed Policy	+	0	+	+	+	0	+	+	+	0	+	++	0	++	0	+	0	++	0	+	Positive	
TOTAL NUMBER OF PLUS SCORES = 243		+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	Very positive	
TOTAL NUMBER OF MINUS SCORES = 26		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		

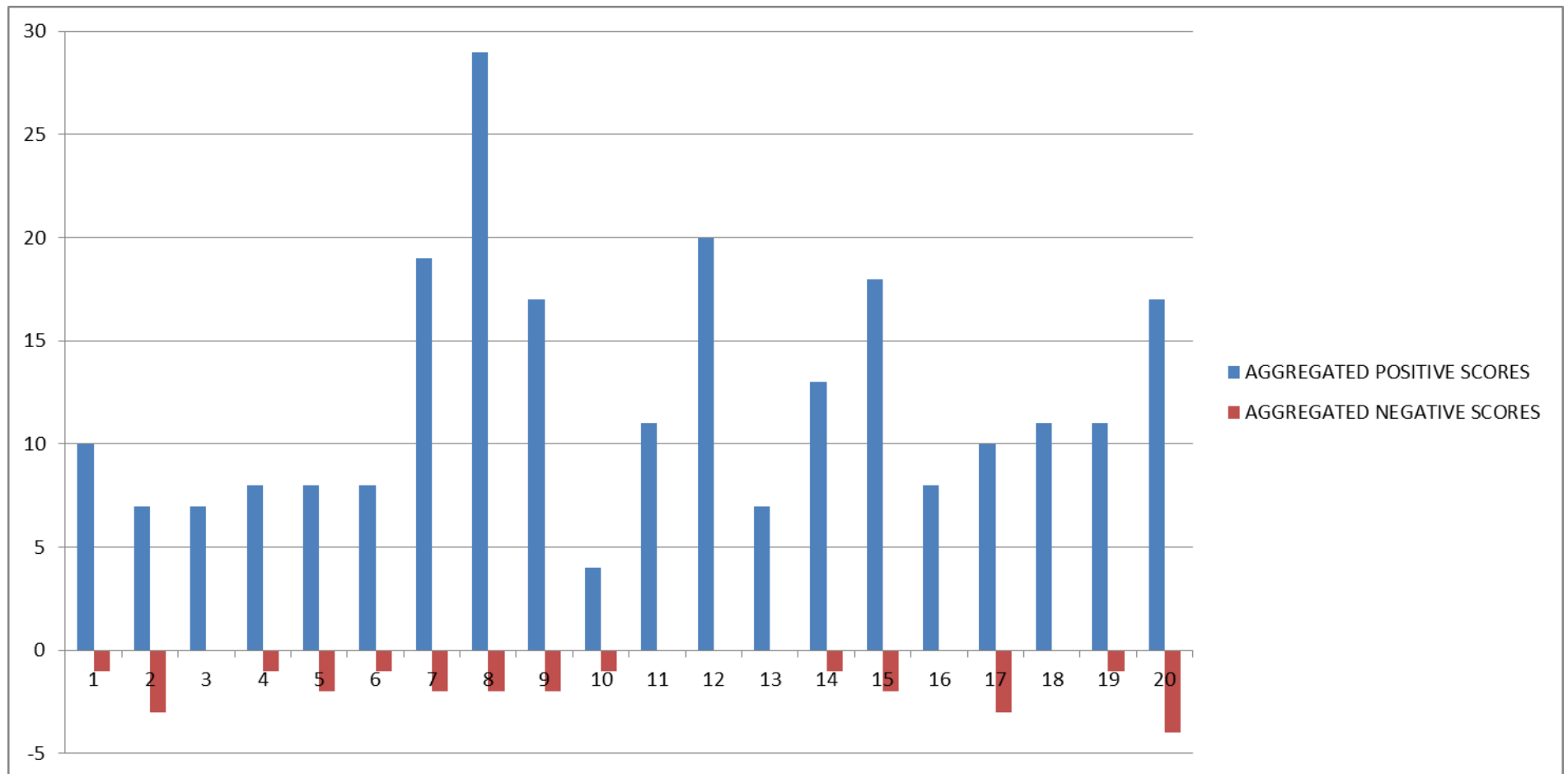
Appendix 3: Update to inset within Table A1 - Relationship of Pre-Submission Polices, Preferred Options Policies and Issues and Options Policies

Table A1: Relationship of Pre-Submission Polices, Preferred Options Policies and Issues and Options Policies (Page 76)

Pre-Submission Document Development Management Policies	Preferred Options Area Wide Policies	Issues and Options Development Management Policies
DM 2 A: Early Review of Local Plan	n/a	n/a

Appendix 4: Replacement Figure 1.3a & Figure 4.1a - Aggregated Scores of Development Management Policies – Bar Chart

Figure 1.3a & Figure 4.1a – Aggregated Scores of Development Management Policies – Bar Chart (Page 7 & 47)



Appendix 5: Replacement: Paragraph 4.1.9

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4.1.9 Particularly high aggregate scores (15 or over) are seen in respect of the following SA Objectives:

- Objective 7 - Maintain and enhance the diversity and distinctiveness of landscape and townscape character;
- Objective 8 - Create places, spaces and buildings that work well, wear well and look good;
- Objective 9 - Reduce emissions of greenhouse gasses and other pollutants (including air, water, soil, noise, vibration and light);
- Objective 12 - Maintain and enhance human health;
- ~~Objective 14 – Improve the quantity and quality of publicly accessible open space; and~~
- Objective 15 – Improve the quality, range and accessibility of services and facilities
- Objective 20 – Improve the efficiency, competitiveness and adaptability of the local economy.

Site Allocations and Settlement Specific Policy Changes Appendices

Appendix 6: Replacement Table 4.1 - Aggregated Scores of Site Allocations and Settlement Specific Policies

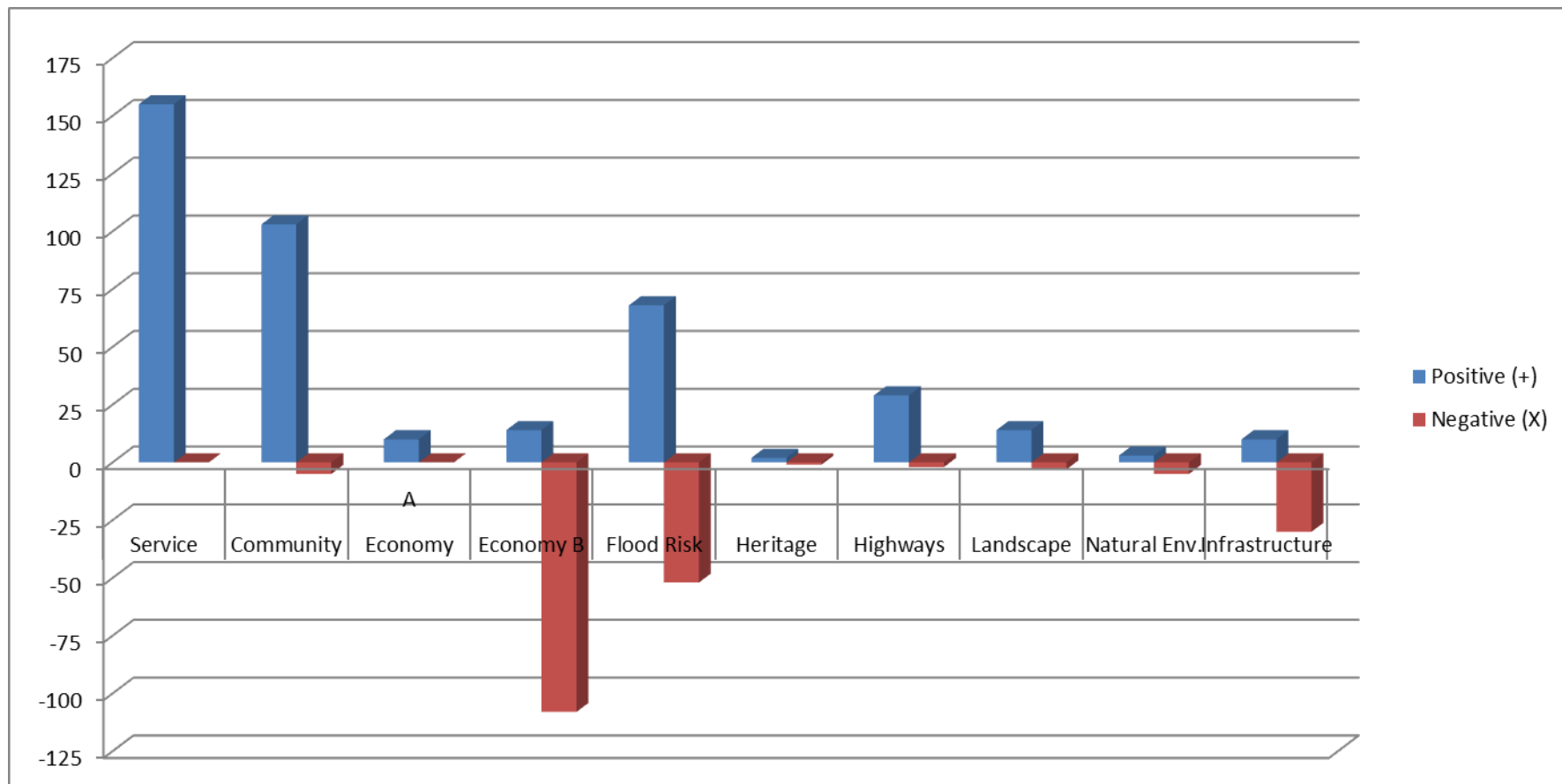
Table 4.1 Aggregated Scores of Site Allocations and Settlement Specific Policies (Page 48)

ALL ALLOCATIONS	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste	TOTALS
Aggregated positive scores (+)	156	103	10	15	68	2	29	15	3	10	411
Aggregated negative scores (X)	0	-6	0	-108	-51	-1	-2	-3	-5	-30	-206

Appendix 7: Replacement Figure 1.3b & Figure 4.1b - Aggregated Scores of Site Allocations and Settlement Specific Policies – Bar Chart

Figure 1.3b - Aggregated Scores of Site Allocations and Settlement Specific Policies – Bar Chart (Page 8)

Figure 4.1b - Aggregated Scores of Site Allocations and Settlement Specific Policies – Bar Chart (Page 49)



Appendix 8: Updated Sustainability Appraisal table for Hunstanton Housing site F2.4 (997)

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Site Ref	Site Sustainability Factor									
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste
F2.4 (997)	+	+	o	xx	+/x	#	#	#	#	x

Appendix 9: Updated King's Lynn Housing Sites - Sustainability Appraisal

Site Ref	Site Sustainability Factor									
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste
E1.4	+	+	O	+	+/x	O	#	#	#	#
E1.5	++	+	O	O	xx	#	#	#	#	?
E1.6	++	+	O	+	+/x	O	#	O	O	#
E1.7	+	+	O	+	+/x	O	#	#	#	?
E1.8	++	+	O	O	xx	#	#	O	O	#
E1.9	+	+	O	+	x	O	#	#	#	#
E1.10	++	+	O	O	xx	#	#	+	O	?
E1.11	++	+	O	+	+/x	#	#	x	+	?

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E1.4 King's Lynn, Marsh Lane - The site scores well in relation to the sustainability indicators 'access to services', 'community and social' and 'food production'. The site is partially constrained by flood risk, with the majority of site being located within Flood Zone 1 and the remaining site area being within Flood Zone 2, hence the '+/x' sustainability score. However, it is considered that measures could be taken to mitigate this risk. In terms of 'highways and transport', 'landscape and amenity', 'natural environment' and 'infrastructure, pollution and waste' it depends on how the scheme is implemented as potential negative impacts could be mitigated through good design.

E1.5 King's Lynn, Boal Quay - The site scores highly in terms of 'access to services' being located centrally within the town and in relation to 'landscape and amenity' as the development will be well screened. The site will have no impact on the economy. The impact of 'heritage', 'highways and transport' and 'natural environment' depends on how the scheme is implemented as potential negative impacts could be mitigated through good design. The site does score poorly in relation to the indicator flood risk, with site located being located within Flood Zone 2, 3 and a portion within the Hazard Zone. Despite the identified flood risk it is considered that appropriate measures could be taken to mitigate this risk.

E1.6 King's Lynn, South of Parkway - The site scores highly in terms of 'access to services' being located centrally within the town. Development of the site will have no impact on 'heritage', 'natural environment' or 'infrastructure, pollution and waste.' The site is partially constrained by flood risk, being located partially within Flood Zone 1 and 2, hence the '+/x' sustainability score. It is considered that this risk could be mitigated through appropriate measures. The impact of 'highways and transport' and 'landscape and amenity' depends on how the scheme is implemented as potential negative impacts could be mitigated through good design.

E1.7 King's Lynn, Land at Lynnsport - The site scores highly in terms of 'access to services', 'community and social' and 'food production.' There is no impact on 'heritage.' Site E1.7 is located within Flood Zones 1, 2 & 3 this is reflected by the positive/negative sustainability score for the 'flood risk' category. However, It is considered that appropriate measures could be taken to mitigate this risk. In terms of 'highways and transport', 'landscape and amenity', 'natural environment' and 'infrastructure, pollution and waste' depends on how the scheme is implemented as potential negative impacts could be mitigated through good design..

E1.8 King's Lynn, South Quay - The site scores highly in terms of 'access to services' being located centrally within the town and in relation to 'landscape and amenity' as the development will be well screened. There is no impact on 'economy'. The impact on 'heritage' and 'highways and transport' depends on how the scheme is implemented as potentially negative impacts could be mitigated through good design. In relation to the indicator 'infrastructure, pollution and waste' the impact is unknown. The site does score poorly in relation to the indicator flood risk, with site located being located within Flood Zone 2, 3 and a portion within the Hazard Zone. Despite the identified flood risk it is considered that appropriate mitigation measures could be taken to mitigate this risk.

E1.9 King's Lynn, Land west of Columbia Way - The site scores fairly well in terms of 'access to services', 'community and social' and 'food production'. There is no impact on 'business' or 'heritage'. In terms of 'highways and transport', 'landscape and amenity', 'natural environment' and 'infrastructure, pollution and waste' it depends on how the scheme is implemented as potential negative impacts could be mitigated through good design. The site scores negatively in relation the 'flood risk' indicator as the site is located partially with Flood Zones 1, 2 & 3. It is considered that through appropriate measures the flood risk could be mitigated.

E1.10 King's Lynn, North of Wisbech Road - The site scores well in terms of the sustainability indicator 'access to services' as it centrally located within the town centre. The site scored positively in terms of 'community and social', 'natural environment' and 'landscape and amenity' as development would be well screened and fit into the surrounding context of the settlement. There will be no impact on the indicator 'economy' and the impact on 'heritage', 'highways and transport' and 'infrastructure, pollution and waste' depend on how the scheme is implemented as potential negative impacts could be mitigated through good design. E1.10 does score poorly in respect of the 'flood risk' category as it is located within areas classed as Flood Zone 2, 3 and the Hazard Zone. Despite the identified flood risk it is considered that appropriate mitigation measures could be taken to mitigate this risk.

E1.11 King's Lynn, Southgates - The site scores well in terms of the sustainability indicator 'access to services' as it centrally located within the town centre. The site scored positively in terms of 'community and social', 'natural environment' and 'landscape and amenity' as development would be well screened and fit into the surrounding context of the settlement. There will be no impact on the indicator 'economy' and the impact on 'heritage', 'highways and transport' and 'infrastructure, pollution and waste' depend on how the scheme is implemented as potential negative impacts could be mitigated through good design. This site scores both positively and negatively with regard to 'flood risk' as the majority of the site it is located within

Flood Zone 1 and a small portion of towards the western boundary is within an area classed as Flood Zone 2. It is considered that this risk could be mitigated through appropriate measures.

Conclusion

All reasonable sites within the King's Lynn urban area have been identified, assessed as being sustainable and taken forward as housing allocations. The overall package scores positively in sustainability terms. The only negative scores are in relation to flood risk. It is considered that appropriate measures could be taken to mitigate this risk.

The Core Strategy sustainability assessment dealt with the principle of concentrating new housing development in King's Lynn. The package of housing sites here takes that approach forward into positive allocations.

Appendix 10: Updated Sustainability Appraisal table for Terrington St. John Housing site G94.1 (Part of 890)

Site Ref	Site Sustainability Factor									
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste
G94.1 (Part of 890)	+	+	o	x	+/x	o	#	o	o	?

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Appendix 11: Updated West Winch Growth Area Sustainability Appraisal

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Site Ref	Site Sustainability Factor									
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste
West Winch Growth Area	++	+	0	X	+	#	+	#	#	#
Sites to the east	++	+	0	X	+	X	?	X	0	#
Sites within North Runcton	+	+	0	X	+	X	X	0	0	#
Sites to the south	+	+	0	X	+/X	X	X	#	0	#
Within West Winch	++	+	0	X	+	X	+	X	X	#

Site 984, 1034	+	+/X	0	+/X	+	0	+	+	#	#
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West Winch Growth Area – This area is considered as a sustainable location for growth, south east of King’s Lynn, as identified in the Core Strategy. The Growth Area performs well in relation to the indicator ‘access to services.’ The impact on ‘landscape and amenity’ depends on how the scheme is implemented as potential negative impacts could be avoided or mitigated through good design. The Growth Area comes close to the listed buildings of Church of St Mary (Grade 2*) and the Windmill (Grade 2) consequently the setting of these have to be treated with great care and potential negative impacts avoided through good design. The site is not constrained by flood risk. The West Winch Growth Area is the chosen allocation as in comparison to other sites considered it will maintain the gap between West Winch and surrounding settlements whilst relating well and enhancing the facilities available for the original settlement. The Growth Area includes the following sites: KWW01, 569, 683, 979, 980, 1047, 1048, 1108, 1240 & 1241 and parts of the following sites: 485, 973, 981, 982, 983, 987, 1034, 1046, 1096, 1220, 1221, 1223, 1224 & 1225

East of the West Winch Growth Area (1095, 1096, 1220, 1224 & 1225) – These sites sit within the gap between the Growth Area and North Runcton, this results in a negative score for the Sustainability Appraisal factor ‘landscape and amenity’ as one of the Plan’s aims is to maintain a gap ensuring that North Runcton remains a distinctive settlement separated from the Growth Area and the associated new link-road. Development of these sites would reduce or remove this gap and therefore impact negatively on the form and character of North Runcton. A further negative is recorded for the factor ‘heritage’ as the sites are within close proximity to three listed buildings in North Runcton; The Church of All Saints (Grade 1), The Old Rectory (Grade 2) and North Runcton Lodge (Grade 2).

Within North Runcton (68, 465, 661, 1189 & 1276) – These sites are located within the settlement of North Runcton, which is designated as a smaller village and hamlet by the Core Strategy and as such does not receive any specific site allocations. In relation to the Growth Area these sites are not only detached, reflected by a negative score in the factor for ‘highways & transport’, but they could also have a negative impact upon the heritage, form and character of North Runcton.

To the South (177, 196, 479, 659 & 1293) – These sites are situated to the south of the Growth Area and as such are detached from it. A negative score for the factor ‘highways and transport’ has been recorded as Norfolk County Council as the Highways Authority comment that these sites are unsuitable due to their remoteness or they would require direct access from/onto the A10. Development of some these sites would result in reducing the gap between the Growth Area and the existing settlement of Setchey, impacting negatively upon the heritage, form and character of Setchey. Setchey is designated as a smaller village and hamlet by the Core Strategy and as such would not receive any specific site allocations. In relation to the Growth Area those sites that are situated within Setchey score negatively in the Sustainability Appraisal factor ‘flood risk’ as they are located within either Flood Zone 2 or 3. Development of Site 1293 would result in the direct loss of employment land; this would result in a negative score in the factor ‘economy A business’ in accordance with policy CS10 of the Core Strategy, and therefore the economic sustainability of a new plan, the Council will seek to retain land or premises currently or last used for employment purposes.

Within West Winch (KWW06, 135, 361, 485, 657, 926, 973, 982, 983, 1045, 1222 & 1273) – These sites are within the existing settlement of West Winch and have been omitted from the Growth Area. In totality negative scores for the factors ‘natural environment’ and ‘landscape and amenity’ are recorded as the majority of these sites would either encroach upon West Winch Common or result in the direct loss of Common Land, therefore not relating to the existing settlement by having a negative impact upon the form, character and setting of West Winch. A number of these sites are detached from the Growth Area and the line of the new link-road, resulting in a poor relationship between the new Growth Area. A number of these sites come close to linking the southern section of King’s Lynn and parts of the Saddlebow Industrial Estate with West Winch; the Growth Area seeks to maintain a gap between West Winch and existing settlements. Note that

KWW06 has already been developed and part of 485 is an existing residential dwelling so has not been included within the Growth Area.

Site 984, 1034 ('Site F') – This site is to the south west of the village centre, immediately adjacent to the existing settlement. In terms of access to services, the site is close to bus stops and an employment area to the south but is further from central village convenience services than some options (e.g. c800m to community centre, c1km to shop, school and church). However, the implementation of proposals for the growth area will increase the service provision in the local area and therefore the site will benefit from its good access links through existing development. The development of this site is expected to include new public open space and allotments, and these are scored as community and social gains additional to the housing provision. While there was opposition to the site's development from nearby residents, it is considered appropriate to score an overall plus in this category. However the site is currently agricultural land and therefore the scores a negative in relation to category 'Economy B Food Production', but also scores a positive because its development would include allotments and hence local food production, resulting in a mixed score. The majority of the site is in SFRA fluvial flood zone 1 (climate change scenario), but a minor portion in the south western part of the site is within zone 2. As this higher flood risk area can accommodate the allotments and/or public open space proposed, rather than housing, an overall positive score is given under this heading. There are no heritage assets such as Listed Buildings within proximity of the site and it is therefore scored as no impact in the 'Heritage' category. The site has adequate road access. Although it suffers from the heavy traffic and congestion on the A10, along with the whole of the settlement and potential development area, this is intended to be addressed through provision of the relief/distributor road element of the strategic growth. It is close to bus stops, and hence is scored positive for 'Highways and Transport'. The site is well related to the existing settlement as the northern and eastern boundary of the site is adjacent to residential development. The western and southern borders open countryside. The impacts on 'landscape and amenity' include a loss of semi-rural outlook to a number of existing properties, but also the gaining of a similar outlook to some of the new properties. The development of the site would have little impact in distant views from the west, but would increase the extent of development close to West Winch Common and the footpath which passes along it. However, the development includes public open space and allotments and this would have landscape and amenity benefits. An overall positive score is considered appropriate. The development of the site could include habitat and biodiversity enhancements as part of the open space, but would result in a loss of some open land, hence a mixed score on Natural Environment. The development of the site would contribute to the area's infrastructure, and therefore a positive under this heading.

Discussion

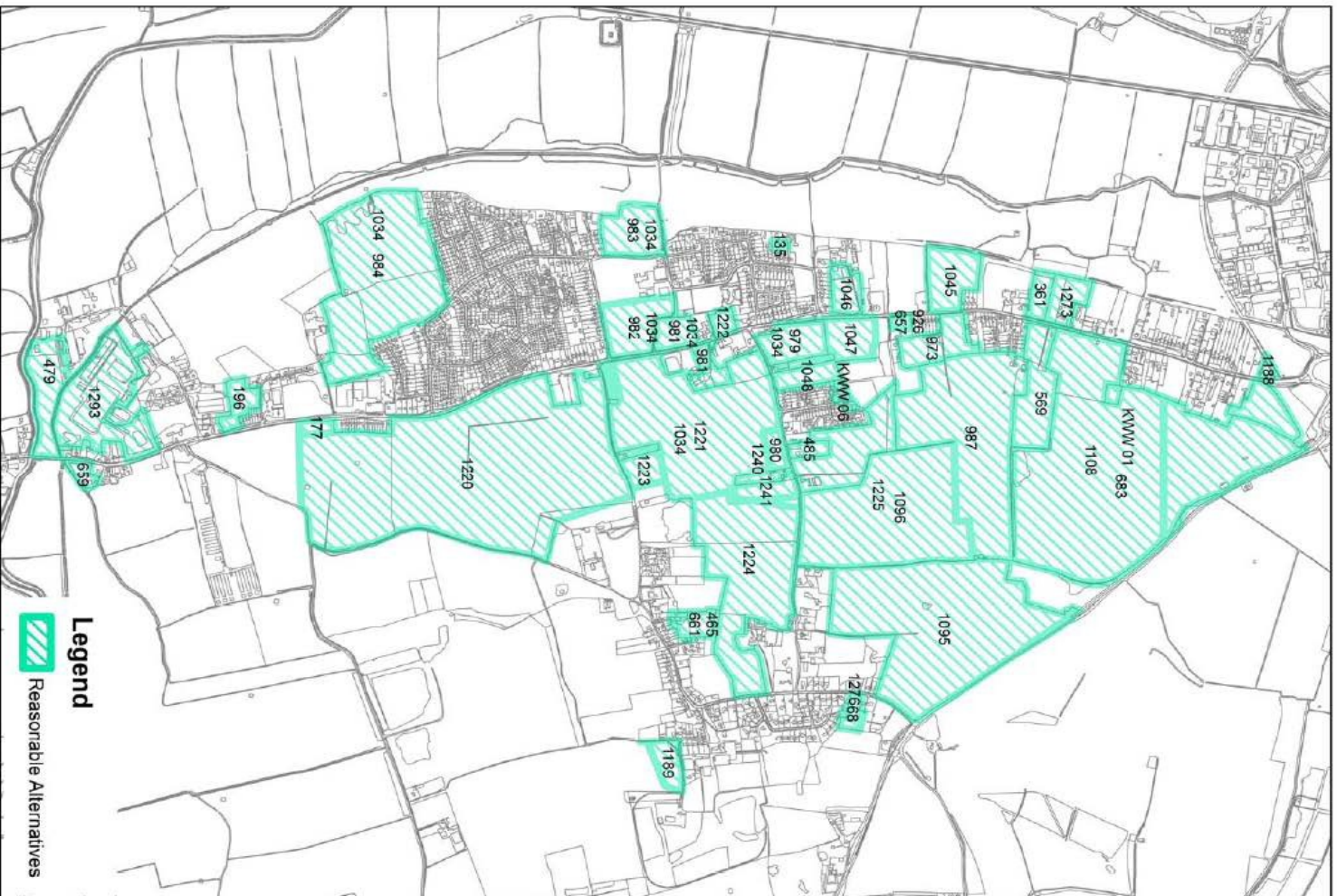
- On balance the Growth Area performs better than other combinations as it isn't constrained by 'flood risk', would have the least impact upon the form and character of existing settlements and any potentially negative impacts associated with 'landscape & amenity' and 'heritage' can be minimised through good design. There would however be a negative score in factor 'economy B food production' with identified productive agricultural land being lost to development, although this is the case with all of the sites proposed, and was factored into the identification of the area by the Core Strategy. The new-link road between the A10 and A47 is planned to provide access and permeability to parts of the Growth Area, some of the submitted sites, due to their geographic location, are detached from this 'fixed line' and/or the Growth Area itself. This connectivity is vital to achieving links and

integration between new residents and business and can contribute to a healthy community. In selecting the extent of the Growth Area, consideration has been given to maintaining a degree of separation between North Runcton and the new neighbourhoods, and to provide a good level of integration with the existing development and facilities in West Winch.

- Sites 998 & 1034 (known as Site F) was included in the Preferred Options but excluded from the submitted Plan. In response to evidence and arguments presented to the Plan Examination it has become appropriate to review the merits and demerits of this site in isolation, rather than in combination with other sites on the west of the settlement, and hence a new separate evaluation of this has been done. Because of the contentious status of this site, and the difficult decisions to be made which will be informed by its SA, this has been done in a little more detail than the earlier work. Broadly speaking this site scores positively on a range of fronts, and while opposed by nearby residents has no major adverse impacts, and its inclusion in the growth area is considered to represent sustainable development.

Conclusion

- As discussed above, The Growth Area, and the inclusion of Site F (Sites 998 & 1034), on balance represents the least constrained combination of sites for development that still provides a degree of separation from North Runcton, when compared to the other reasonable options considered. Therefore this Growth Area, including Site F, is an appropriate allocation for an urban expansion area adjacent to south east King's Lynn.



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