

**Borough of King's Lynn & West Norfolk
Site Specific Allocations and Policies
Issues and Options Consultation Document**

Preliminary Sustainability Appraisal

Non-Technical Summary

September 2011

1. Introduction

- 1.1 This report is a non-technical summary of the findings of an early stage Sustainability Appraisal (SA) of the Site Specific Allocations and Policies Issues and Options Document. Its purpose is to report the findings of the SA in a way that can be easily understood and without the use of jargon or technical language.

2. Relationship between the Site Specific Allocations and Policies Development Plan Document and the Core Strategy

- 2.1 The Site Specific Allocations and Policies (SSA&P) Development Plan Document (DPD) is one of the documents that will make up the King's Lynn & West Norfolk Local Development Framework (LDF). The SSA&P, in its final form, will set out the main proposals for where development should occur and key areas that should be protected from development. It does this by 'allocating' specific sites on a map and by putting forward some place specific policies as well as more general development management policies.
- 2.2 The Core Strategy (the principle DPD), which was adopted in July 2011, has already established the 'big' issues such as the hierarchical approach to development by settlement type (the settlement types being: 'sub-regional centre' (King's Lynn), 'main towns' (Downham Market, Hunstanton and Wisbech fringe), 'settlements adjacent to King's Lynn and the main towns', 'Key Rural Service Centres', 'rural villages' and 'smaller villages and hamlets'), and the overall amount of housing needed in the borough.
- 2.3 The table below shows the number of new housing allocations required per settlement type as laid out in Policies CS01 and CS09 of the Core Strategy.

Settlement Type	Number
King's Lynn (including adjacent settlements: Sth. Wootton, Nth. Wootton, South East Lynn (West Winch and North Runcton area) and North East Lynn (adjacent to Knights Hill))	5,070
Other main towns:	
Downham	390
Hunstanton	220
Wisbech fringe	550
Key Rural Service Centres	660
Rural villages	215
TOTAL	7,105

- 2.4 Key roles of the SSA&P will be to decide upon the best means of distributing housing between the settlement types and the best (most sustainable) locations within each settlement for development.
- 2.5 The SSA&P DPD is required to comply with the Core Strategy (of which the hierarchical approach outlined at policy CS02 has a particularly important bearing). It must also take into account the government's statements on planning policies and the Regional Spatial Strategy (RSS).

3. Strategic Environmental Assessment (SEA) / Sustainability Appraisal (SA)

- 3.1 The planning system requires plans to go through a European process called Strategic Environmental Assessment (SEA) and a national process called Sustainability Appraisal (SA). SEA and SA are processes by which the environmental, social and economic effects of a strategic action (a plan or a programme) are considered during its preparation. There is a large amount of overlap between the SEA and SA processes and they have therefore been combined into one SA process for the assessment of the SSA&P. The aim of these processes is to identify the likely effects of a plan or programme in advance so that adverse effects can be minimised and beneficial effects can be maximised. The findings of SA should be reflected in the adopted plan / document to help ensure that it maximises its contribution to future sustainability.
- 3.2 A Scoping Report for the SA of the King's Lynn & West Norfolk Borough Local Development Framework (LDF) was produced in November 2005. The Scoping Report identified sustainability issues affecting the Borough and laid out a set of sustainability objectives that all subsequent LDF Development Plan Documents (and as such the SSA&P) are to be assessed against. Twenty sustainability appraisal objectives were identified; a number of which specifically relate to the SEA objectives. The full list of objectives can be found at the back of this document.
- 3.3 The Scoping Report uses an approach that addresses the requirements of the SEA and SA simultaneously, by giving full consideration to environmental issues whilst also addressing the spectrum of socio-economic concerns. In terms of the specific requirements of the Directive, the Scoping Report and the relevant Final Appraisal Report will together meet the need for an 'Environmental Report' setting out the likely significant effects on the environment of implementing the proposals (and the reasonable alternatives that have been considered).

4 Background

- 4.1 A call for sites consultation was carried out in May and June 2009. All sites put forward were assessed to see if they were available, deliverable and developable in terms of housing development as part of the Strategic Housing Land Availability Assessment (SHLAA) which was published by the Borough Council earlier in 2011. Some sites were acceptable in principle, others partially acceptable and some rejected. Sites in the first two categories were considered

to be appropriate to put forward as possible options for housing development (in certain localities) as part of the SSA&P DPD. In addition there will be the opportunity for further information on the rejected sites to be put forward in an attempt to overcome the constraints that initially placed them in the 'rejected' category.

- 4.2 As outlined at 2.1, the SSA&P DPD relates to all future development in the borough up to 2026 not only housing, and suggests sites for different land uses (e.g. employment) along with specific and more general policies to help guide development to the right location.

5 Moving Forward

- 5.1 The table below shows the proposed timetable for the production of the Site Specific Allocations and Policies DPD.

Key Milestones	Timescale
Consultation on Site Specific Allocations and Policies Document	23 Sept. - 18 Nov. 2011
Consultation on Preferred Options	Spring 2012
Final draft consultation on Preferred Options	Autumn 2012
Submission and Examination	Winter 2012 / 2013

- 5.2 The table above shows a number of steps on route to the adoption of the final document. The SA process and planning legislation focuses on the assessment of the policies, site assessments and site allocations proposed by the SSA&P DPD, and the 4 step process shown above will allow for the evolution of the most sustainable plan by enabling an SA commentary at each stage.

6. Assessment of Sites / Policies

- 6.1 The SEA Directive requires the assessment to identify, describe and evaluate *'the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives'*. The environmental report should also include information on *'the likely evolution [of the current state of the environment] without implementation of the plan'*.
- 6.2 LDFs should be guided by sustainable development principles and be in general conformity with national and regional policy objectives. This limits the range of policy options that are available. Therefore, whilst various options have been considered through evidence gathering and consultation, only options that were realistic, appropriate and in accordance with national and regional policy, as well as the Core Strategy, were considered and appraised.

- 6.3 In order to meet the objectives of the SEA Directive for most policies proposed there are two options and these are generally the policy as written and no policy; in some instances there are four options (when this occurs they are generally the policy as written, no policy, and two additional policy alternatives). In most instances however there are three policy options: the policy as written, no policy, and one additional policy alternative.

7. Summary of the Sustainability Appraisal Outcomes

- 7.1 The SA has concluded that a range of sustainable outcomes could occur from different policy options: positive, mixed, negligible and negative. The SA generally concludes that the policy options as written are the most sustainable and are likely to have the most beneficial effects across the range of economic, social, and environmental issues.

8 Likely Significant Effects

- 8.1 Three areas have been highlighted as having likely significant effects, and these fall into the categories of: King's Lynn, flooding and cumulative impacts. Other significant effects have been categorised under the three main sustainability headings of environment, social, and economic.

8.2 King's Lynn

- 8.2.1 In the King's Lynn area one of the most significant effects is likely to occur from King's Lynn Town Centre Expansion which would see an increase in easily accessible services and facilities, including community facilities, whilst discouraging out of town shopping centres. Furthermore the increase in floorspace would be primarily through the redevelopment and improvements of existing buildings and land as thus not only improving the visual amenity of the built environment, but also limiting the impacts on greenfield land and water systems. The Town Centre Expansion, coupled with specific economic policy and general town centre and retail policies will make for a strong policy approach that has the potential to significantly improve the sustainability of King's Lynn's leisure and retail offer.

8.3 Flooding

- 8.3.1 In hazard zones of coastal flood risk areas policy DM8 is likely to have a significant effect on the amount of people and possessions at risk associated with flooding by strictly controlling development in such locations. At the present time such control is down to national policy and a protocol, whose lack of proper adoption, puts its strength into question.

8.4 Environmental

- 8.6.1 The SA has shown that the majority of the as written policies would have a sustainable environmental impact by largely requiring development on previously developed land (the exception to this being the King's Lynn Economy policy

which acknowledges that some development on previously undeveloped land may occur). In all instances biodiversity and geodiversity have been considered and the green infrastructure policies not only protect, but are likely to improve habitat creation.

8.5 Social

8.5.1 The SA has shown that the majority of as written policies would have a positive impact on achieving a more equitable distribution of prosperity and fairer access to services by providing some development, infrastructure and service improvements to areas that contain pockets of deprivation (e.g. South Lynn); and by increasing the number of homes (including affordable housing) and jobs in the borough.

8.5.2 The SA has shown that the majority of as written policies would have a positive impact on health by providing and/or enhancing the factors that contribute to health and wellbeing; these factors (or determinants of health) include: access to housing, employment and services, and provision of / enhancement to open spaces / green infrastructure.

8.6 Economic

8.6.1 The SA has shown that the majority of as written policies would have a positive impact on economic growth and diversity, employment and investment. In particular: in the sustainable approach to economic growth by guiding the direction of the economic expansions to ensure jobs are close to the main populace; ensuring green infrastructure is incorporated into new developments thus increasing their visual appeal; ensuring, wherever possible, development takes place on / in previously developed land or buildings; ensuring the town centres are protected from out-of-town developments; and encouraging investment to improve shop frontages.

8.7 Cumulative Impacts

8.7.1 All of these outcomes will have a positive impact on the perception of the borough and will ensure that residents and people who work and visit the area enjoy what it has to offer.

8.7.2 There are potential adverse impacts that are likely to result from an increase in population and economic activity; these include: consumption of resources and production of waste; impact on the landscape; impact on historic, biodiversity and geodiversity sites; and loss of land.

8.9 Summary

8.9.1 The above shows that the as written policies could result in a number of significant sustainable effects as well as some less welcome effects that will always go hand-in-hand with development. However, the SA has also shown that the draft policies within the SSA&P will lessen these impacts, and these effects are explored more fully in the Sustainability Appraisal.

9. What would the situation be without the DPD?

- 9.1 This section aims to show what the situation would be without the as written policies i.e. development would purely be reliant on national and regional policies where they exist or no policy at all where they don't.
- 9.2 It is difficult to accurately forecast the 'future situation' without the DPD. However the Core Strategy has established the number and general location of the identified housing need and therefore housing development is still likely to progress without the DPD.
- 9.3 National, regional and other local policies would still protect the countryside from some inappropriate housing development and areas at risk of flooding would be warranted some protection by this raft of policy. However, with the imminent revocation of Regional Spatial Strategies and the consultation on the Draft National Planning Policy Framework (DNPPF), which is likely to result in national guidance being simplified, local policies are becoming ever more important.
- 9.4 The adoption of the Core Strategy and its hierarchical approach to development will ensure that the areas of the borough identified as the least sustainable (smaller villages and hamlets) will remain largely free from additional development. However the DPD will establish the settlement boundaries and within those boundaries establish the most sustainable locations for development. As such without this DPD it would be harder to direct development to the most sustainable locations within the areas identified for development (i.e. town centres and their surrounding fringes and Key Rural Service Centres).
- 9.5 Employment uses have been identified in the Core Strategy and as such these allocations could still go ahead without the DPD. Furthermore the general location for urban expansion has been identified in the key diagrams for each town. However the detailed town centre expansion policies coupled with retail frontage policies that would be established by the DPD would be missing and therefore protection of the existing town centres from out of town development would be diluted.
- 9.6 The Core Strategy, combined with the Green Infrastructure Plan, alongside national and regional policies are likely to ensure some protection of geodiversity, biodiversity and the historic environment. However this comes with the same caveat with regard to national and regional policy as stated at 9.2, and the same protection and direction is not available without the DPD.
- 9.7 With regard to the removal of agricultural occupancy conditions, without the DPD this element would be purely reliant on national policy of which there is a current lack of any detail. This, coupled with the likely simplification of national policy by virtue of the DNPPF, could well lead to a flow of countryside dwellings (that are currently protected by agricultural occupancy restrictions) onto the open market. These dwellings would be far from services and facilities and would remove from the housing stock those houses required for agricultural workers. As such new dwellings in the countryside could be approved to make up for this loss. Such a scenario has a cyclical potential that is clearly unsustainable.

10 Conclusion

- 10.1 It is clear when comparing sections 8 and 9 that the as written policies will enable for much more sustainable development within the borough than without them. However, what is not shown above, but is considered in detail in the full SA, is the alternative options approach. At para 7.1 it is explained that the majority of policies have a number of alternative approaches - the number of permutations available from these options is too great to detail in this summary document. Therefore only the overall broad approaches are outlined.

11. Next Steps

- 11.1 Informed by consultation, the initial SA and supporting evidence, the Borough Council will provide a preferred list of sites / policies for consultation. This document will set out those sites / policies that the Borough Council recommends are taken forward into the final DPD.
- 11.2 The preferred sites / policies document will also be subject to SA and public consultation.
- 11.3 The final Site Specific Allocations and Policies DPD is hoped to be adopted early in 2013, subject to the Examination process.

Sustainability Appraisal Objectives

Land and water resources	<ul style="list-style-type: none"> • Minimise the irreversible loss of undeveloped land and productive agricultural holdings • Minimise waste and reduce the use of non-renewable energy sources. • Limit water consumption to levels supportable by natural processes and storage system
Biodiversity and geo	<ul style="list-style-type: none"> • Avoid damage to designated sites and protected species • Maintain and enhance the range and viability of characteristic habitats and species
Landscape, townscape	<ul style="list-style-type: none"> • Avoid damage to protected sites and historic buildings and archaeology • Maintain and enhance the diversity and distinctiveness of landscape and townscape character • Create places, spaces and buildings that work well, wear well and look good
Climate change and pollution	<ul style="list-style-type: none"> • Reduce emissions of greenhouse gasses and other pollutants (including air, water, soil, noise, vibration and light) • Minimise waste production and support the recycling of waste products • Limit or reduce vulnerability to the effects of climate change (including flooding)
Healthy communities	<ul style="list-style-type: none"> • Maintain and enhance human health • Reduce and prevent crime, and reduce the fear of crime • Improve the quantity and quality of publicly accessible open space
Inclusive communities	<ul style="list-style-type: none"> • Improve the quality, range and accessibility of services and facilities (e.g. health, transport, education, training, leisure opportunities) • Redress inequalities related to age, gender, disability, race, faith, location and income • Ensure all groups have access to decent, appropriate and affordable housing • Encourage and enable the active involvement of local people in community activities
Economic activity	<ul style="list-style-type: none"> • Help people gain access to satisfying work appropriate to their skills, potential and place of residence • Improve the efficiency, competitiveness and adaptability of the local economy