

**King's Lynn and West Norfolk  
Local Development Framework**

**Core Strategy  
Sustainability Appraisal**

**Prepared for  
King's Lynn and West Norfolk  
Borough Council  
by  
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# **I. INTRODUCTION**

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## **INTRODUCTION TO THE KING'S LYNN AND WEST NORFOLK LOCAL DEVELOPMENT FRAMEWORK**

- I.1. King's Lynn and West Norfolk Borough Council is replacing its Local Plan with a new type of plan, the Local Development Framework, which is being prepared under the Planning and Compulsory Purchase Act<sup>1</sup>. The LDF will be made up of Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs), in line with the Government's new format for development plans. The LDF will guide new development and the use of land in the Borough up to 2021.

## **INTRODUCTION TO THE KING'S LYNN AND WEST NORFOLK CORE STRATEGY**

- I.2. The Core Strategy is the key Development Plan Document in the LDF. It will provide the spatial vision, objectives, policies and a monitoring and implementation framework for the Borough of King's Lynn and West Norfolk. The Core Strategy will help to determine the broad location of housing and other strategic development needs such as employment, retail, leisure, community, essential public services and transport development. It will set out the LDF's role in delivering the Council's vision for the Borough, objectives for the development and improvement of the physical environment and a strategy for delivering these objectives. The Core Strategy Preferred Options Paper was produced by the Borough Council of King's Lynn and West Norfolk in June 2006.
- I.3. The Core Strategy Preferred Options Paper contains:
- The issues, needs, natural resources and constraints facing the Borough;
  - A summary of the requirements of the Regional Spatial Strategy (RSS) for the East of England;
  - The relationship of the Core Strategy with Development Plan Documents (DPDs) or saved policies;
  - The Spatial Objectives for the Borough;
  - Visions for:
    - King's Lynn;
    - Downham Market;
    - Hunstanton; and

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<sup>1</sup> Planning and Compulsory Purchase Act 2004 (Commencement No. 3) Order 2004

- Rural Areas;
- Policies on:
  - Achieving Sustainable Development;
  - Housing;
  - Economic Regeneration;
  - Transport and Travel;
  - Sports, Recreation and Open Space;
  - Environmental Protection;
  - Coastal Planning;
  - Countryside and Landscape Protection;
  - Biodiversity;
  - Conservation of the Built Environment;
  - General Considerations.

## OBJECTIVES AND STRUCTURE OF THE SUSTAINABILITY APPRAISAL REPORT

- I.4. The DPDs and SPDs that make up the LDF must, under the Planning and Compulsory Purchase Act (2004)<sup>2</sup>, undergo a Sustainability Appraisal (SA) as part of the process of ensuring that they will contribute to sustainable development. The SA conducted must also meet the requirements for Strategic Environmental Assessment (SEA) in accordance with European Directive 2001/42/EC (the SEA Directive)<sup>3</sup>. The SA will play an important part in demonstrating whether the Core Strategy is sound by ensuring that it reflects sustainability objectives. The results of the SA will contribute to a reasoned justification of policies<sup>4</sup>.
- I.5. This report constitutes the SA Report of the King's Lynn and West Norfolk Local Development Framework Core Strategy. The report is broken down into seven sections:
- **Section 2** sets out the methodology used to carry out this SA. It outlines the tasks undertaken, when and by whom these tasks were carried out. The outline for consultation on the SA is set out, and the difficulties encountered in collecting information and carrying out the appraisal is discussed.
  - **Section 3** discusses the sustainability baseline and context of King's Lynn and West Norfolk. The relevant plans and programmes that were reviewed as part

<sup>2</sup> Planning and Compulsory Purchase Act 2004 (Commencement No. 3) Order 2004

<sup>3</sup> The SEA Directive: European Directive 2001/42/EC (EC, 2001)

<sup>4</sup> Planning Policy Statement 12: Local Development Frameworks. *Office of the Deputy Prime Minister*. 2004.

of the SA are listed, and the baseline information collected to carry out this appraisal is summarised. The key sustainability issues facing King's Lynn and West Norfolk are identified, along with their likely evolution without the implementation of the plan, and the potential influence of the plan. Finally, the SA Framework used to appraise the Core Strategy is set out.

- **Section 4** appraises the objectives of the Core Strategy against the SA Framework Objectives, and the synergies and potential conflicts are summarised. The main strategic options considered are outlined, and the preferred options identified.
- **Section 5** appraises the policies that make up the Core Strategy itself. The effects of the Core Strategy Preferred Options are predicted and evaluated, and recommendations are made for ways of mitigating adverse effects and maximising beneficial effects.
- **Section 6** proposes measures for monitoring the significant effects of implementing the Core Strategy.
- **Section 7** summarises the effects of the Core Strategy, and draws conclusions from these effects.

## COMPLIANCE WITH THE SEA DIRECTIVE

- 1.6. This SA report takes into account the requirements of the SEA Directive and follows the advice of the ODPM SA Guidance<sup>5</sup> (2005). **Table 1.1** sets out the requirements of the SEA Directive, and identifies which section of this Report addresses each of these requirements.

**Table 1.1 The requirements of the SEA Directive and where these have been addressed in the SA Report**

Requirements	Where covered in SA Report
<b>Preparation of an environmental report</b> in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I):	Throughout
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	1.2 – 1.3 3.1
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	3.3 – 3.25
c) The environmental characteristics of areas likely to be significantly affected	3.3 – 3.25 and Table 3.2
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	3.3 – 3.25 and Table 3.2
e) The environmental protection objectives, established at international, Community or	Appendices 2 and

<sup>5</sup> Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents. *Office of the Deputy Prime Minister*. 2005.

Requirements	Where covered in SA Report
national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	4
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects <b>should</b> include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Sections 4 and 5
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Recommendations in Sections 4 and 5
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	4.34 – 4.45 and 5.1 – 5.2; 3.21 – 3.22
i) a description of measures envisaged concerning monitoring in accordance with Art. 10;	6.5 – 6.11
j) a non-technical summary of the information provided under the above headings	Non-Technical Summary



## 2. METHODOLOGY

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### SA STAGES AND TASKS

- 2.1. The ODPM's SA Guidance explains the main stages of the SA process and how these should be carried out as part of the plan-making process. **Table 2.1** sets out the SA Stages and Tasks that should be incorporated within the process of DPD preparation.

**Table 2.1 Corresponding stages in plan-making and SA (based on SA Guidance, ODPM 2005<sup>6</sup>)**

<b>DPD Stage 1: Pre-production – Evidence Gathering</b>
<b>SA stages and tasks</b>
<b>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</b> <ul style="list-style-type: none"><li>• <b>A1:</b> Identifying other relevant policies, plans and programmes, and sustainability objectives</li><li>• <b>A2:</b> Collecting baseline information</li><li>• <b>A3:</b> Identifying sustainability issues and problems</li><li>• <b>A4:</b> Developing the SA framework</li><li>• <b>A5:</b> Consulting on the scope of the SA</li></ul>
<b>DPD Stage 2: Production</b>
<b>SA stages and tasks</b>
<b>Stage B: Developing and refining options and assessing effects</b> <ul style="list-style-type: none"><li>• <b>B1:</b> Testing the DPD objectives against the SA Framework</li><li>• <b>B2:</b> Developing the DPD options</li><li>• <b>B3:</b> Predicting the effects of the DPD</li><li>• <b>B4:</b> Evaluating the effects of the DPD</li><li>• <b>B5:</b> Considering ways of mitigating adverse effects and maximising beneficial ones</li><li>• <b>B6:</b> Proposing measures to monitor the significant effects of implementing the DPDs</li></ul>
<b>Stage C: Preparing the Sustainability Appraisal Report</b>

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<sup>6</sup> Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents. *Office of the Deputy Prime Minister*. 2005.

<ul style="list-style-type: none"> <li>• <b>C1:</b> Preparing the SA Report</li> </ul>
<b>Stage D: Consulting on the preferred options of the DPD and SA Report</b> <ul style="list-style-type: none"> <li>• <b>D1:</b> Public participation on the preferred options of the DPD and the SA Report</li> <li>• <b>D2(i):</b> Appraising significant changes</li> </ul>
<b>DPD Stage 3: Examination</b>
<b>SA stages and tasks</b>
<ul style="list-style-type: none"> <li>• <b>D2(ii):</b> Appraising significant changes resulting from representations</li> </ul>
<b>DPD Stage 4: Adoption and monitoring</b>
<b>SA stages and tasks</b>
<ul style="list-style-type: none"> <li>• <b>D3:</b> Making decisions and providing information</li> </ul>
<b>Stage E: Monitoring the significant effects of implementing the DPD</b> <ul style="list-style-type: none"> <li>• <b>E1:</b> Finalising aims and methods for monitoring</li> <li>• <b>E2:</b> Responding to adverse effects</li> </ul>

## **STAGE A – SETTING THE CONTEXT AND OBJECTIVES, ESTABLISHING THE BASELINE AND DECIDING ON THE SCOPE**

- 2.2. The Borough Council of King's Lynn and West Norfolk undertook the pre-production evidence gathering for the production of the Core Strategy and the SA. This involved identifying and reviewing other relevant plans and programmes and sustainability objectives, and collecting large amounts of baseline information, identifying sustainability issues and problems and developing the SA Framework. This went towards the production of an SA Scoping Report, which was completed and consulted on in June 2005. Consultees' comments on the Scoping Report are set out in **Appendix I**. These comments were addressed by Land Use Consultants in reviewing and updating the Scoping Report in February 2006, and are reflected in this SA Report (primarily in **Appendices 2 and 3**). The actions which arose from each of the Consultees' comments are set out in **Appendix I**.

## **STAGE B – DEVELOPING AND REFINING OPTIONS AND ASSESSING EFFECTS**

- 2.3. The Core Strategy's options for policies and an Issues and Options Report were developed by the Borough Council. An SA of this Report was prepared by the Council in June 2005, and based on this, preferred options were identified.

- 2.4. Land Use Consultants were appointed by the Borough Council of King's Lynn and West Norfolk in January 2006 to carry out the Sustainability Appraisal of the Core Strategy of the LDF. The effects of the Core Strategy were assessed as part of the SA by Land Use Consultants through April to June 2006. The Core Strategy Objectives were assessed for their compatibility with the SA Objectives (see Section 4) and the effects of the Core Strategy's policy Preferred Options were predicted and evaluated (see Section 5).

## **STAGE C – PREPARING THE SUSTAINABILITY APPRAISAL REPORT**

- 2.5. This SA Report has been produced for the Borough Council of King's Lynn and West Norfolk by Land Use Consultants. It brings together all the work undertaken on the SA and sets out what the effects of implementing the Core Strategy Preferred Options are anticipated to be, together with recommendations for improvement to minimise any adverse effects (i.e. mitigation) and maximise positive effects arising. The SA Report incorporates the requirements for an Environmental Report under the SEA Directive.

## **STAGE D – CONSULTING ON THE PREFERRED OPTIONS AND THE SA REPORT**

- 2.6. The SA Report is being consulted on alongside the Preferred Options Report. Comments on the SA Report should be submitted to the Borough Council between **9<sup>th</sup> October 2006** and **20<sup>th</sup> November 2006**. Comments should be sent to:

Development Services  
Borough Council of King's Lynn & West Norfolk  
King's Court  
Chapel Street  
King's Lynn  
Norfolk  
PE30 1EX

Tel: 01553 616200

Email: [ldf@west-norfolk.gov.uk](mailto:ldf@west-norfolk.gov.uk)

## **STAGE E – MONITORING THE IMPLEMENTATION OF THE PLAN**

- 2.7. The significant effects of the plan must be monitored to identify unforeseen adverse effects and enable appropriate remedial action to be taken. Suggestions for monitoring are made as part of the SA Report (see Section 6).

### 3. SUSTAINABILITY BASELINE AND CONTEXT

#### REVIEW OF RELEVANT PLANS AND PROGRAMMES

- 3.1. In line with the SEA Directive's requirement to provide information on the plan's or programme's "*relationship with other relevant plans and programmes*"<sup>7</sup>, relevant plans and programmes were identified and reviewed during the preparation of the Scoping Report, and have been taken into account in this SA Report. The plans were reviewed for their links to the King's Lynn and West Norfolk LDF Core Strategy, and the "*environmental protection objectives established at international, [European] Community or national level, which are relevant to the plan... and the way those objectives and any environmental considerations have been taken into account during its preparation*"<sup>8</sup> which they identify<sup>9</sup>. This represents Task A1 in the ODPM's SA Guidance<sup>10</sup>, "*Identifying other relevant policies, plans, programmes and sustainability objectives*". The plans and programmes which were considered relevant are listed in **Table 3.1** below.

**Table 3.1 Relevant plans and programmes**

Plans and programmes reviewed
<b>International</b>
Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979)
Bonn Convention on the Conservation of Migratory Species of Wild Animals (1979)
EC Council Directive 79/409/EEC, on the Conservation of Wild Birds (1979)
EC Council Directive 85/337/EEC & 97/11/EC on the Assessment of the Effects of certain Public and Private Projects on the Environment (1985)
EC Council Directive 92/43/EEC, on the Conservation of Natural Habitats and of Wild Fauna and Flora (1992)
EC Council Directive 99/31/EC, on the landfill of waste (1999)
EC Council Directive 2000/60/EC, Water Framework Directive (2000)
Kyoto Protocol (1992)
Ramsar Convention on Wetlands of International Importance especially as Waterfowl Habitat (1971)
The Johannesburg Declaration on Sustainable Development (2002)
<b>National</b>
A Better Quality of Life: A Strategy for Sustainable Development for the UK (DETR, 1999)
Energy White Paper: Our Energy Future: Creating a Low Carbon Economy (DTI, 2003)

<sup>7</sup> The SEA Directive: European Directive 2001/42/EC (EC, 2001) (Directive Annex I a, e)

<sup>8</sup> The SEA Directive: European Directive 2001/42/EC (EC, 2001) (Directive Annex I a, e)

<sup>9</sup> The review of plans and programmes also included policy statements

<sup>10</sup> Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents. *Office of the Deputy Prime Minister*. 2005.

Home Office Targets: Delivery Report, (HO, 2003)
Planning Policy Statement 1: Delivering Sustainable Development (ODPM, 2005)
Planning Policy Guidance Note 3: Housing (ODPM, 2000)
Planning Policy Guidance Note 4: Industrial and Commercial Development and Small Firms (ODPM, 1992)
Planning Policy Statement 6: Planning for Town Centres (ODPM, 2005)
Planning Policy Statement 7: Sustainable Development in Rural Areas (ODPM, 2004)
Planning Policy Guidance Note 8: Telecommunications (ODPM, 2001)
Planning Policy Statement 9: Biodiversity and Geological Conservation (ODPM, 2005)
Planning Policy Statement 10: Planning for Sustainable Waste Management (ODPM, 2005)
Planning Policy Statement 12: Local Development Frameworks (ODPM, 2004)
Planning Policy Guidance Note 13: Transport (DETR, 2001)
Planning Policy Guidance Note 14: Development on Unstable Land (ODPM, 1990)
Planning Policy Guidance Note 15: Planning and the Historic Environment (DoE, 1994)
Planning Policy Guidance Note 16: Archaeology and planning (DoE, 1993)
Planning Policy Guidance Note 17: Planning for Open Space, Sport and Recreation (ODPM, 2002)
Planning Policy Statement 22: Renewable Energy (ODPM, 2004)
Planning Policy Statement 23: Planning and pollution control (ODPM, 2004)
Planning Policy Guidance Note 24: Planning and Noise (ODPM, 1994)
Planning Policy Guidance Note 25: Development and Flood Risk (ODPM, 2001)
Planning and Compulsory Purchase Act 2004
Planning (Listed Buildings and Conservation Areas) Act 1990
Rural White Paper: Our Countryside: The Future – A Fair Deal for Rural England (DETR, 2000)
Saving Lives: Our Healthier Nation White Paper (DoH, 1999)
Strategy for Sustainable Farming and Food (DEFRA, 2002)
Transport Ten Year Plan (Department of Transport, 2000)
The Air Quality Strategy for England, Scotland, Wales and Northern Ireland: Addendum (DEFRA, 2003)
UK Waste Strategy (DEFRA, 2000)
Working with the Grain of Nature: A Biodiversity Strategy for England (DEFRA, 2002)
<b>Regional</b>
A Shared Vision, The Regional Economic Strategy for the East of England (EEDA, 2004)

A Sustainable Development Framework for the East of England (EERA, 2001)
Culture: A Catalyst for Change. A Strategy for Cultural Development for the East of England (Living East, 1999)
Draft Regional Spatial Strategy for the East of England (RSS 14)(EERA, 2004)
East of England Regional Waste Management Strategy (East of England Regional Waste Technical Advisory Body, 2002)
EEDA Corporate Plan 2003-2006
Framework for Regional Employment and Skills Action (FRESA) (EEDA, 2003)
Living with Climate Change in the East of England (East of England Sustainable Development Roundtable, 2003)
Our Environment, Our Future (Regional Environment Strategy) (EERA, 2003)
Regional Economic Strategy (EEDA, 2001)
Regional Housing Strategy 2003-2006 (Regional Housing Forum, 2003)
Regional Planning Guidance for East Anglia (Go-East, 2000)
Regional Social Strategy (EERA, 2003)
Sustainable Communities in the East of England (ODPM, 2003)
Sustainable Tourism Strategy for the East of England – Draft (East of England Tourist Board, 2003)
Towards Sustainable Construction, A Strategy for the East of England (EP, CE, GO-East, PECT, 2003)
Towns and Cities Strategy and Action Plan (EEDA, 2003)
Water Resources for the Future: A Strategy for Anglian Region (Environment Agency, 2001)
Woodland for life: The Regional Woodland Strategy for the East of England (EERA & the Forestry Commission, 2003)
<b>County</b>
Biodiversity Supplementary Planning Guidance for Norfolk (NCC, 2004)
Countryside Management Plans
Norfolk Biodiversity Action Plans (NCC, 2004)
Norfolk Local Transport Plan 2001-2006 (NCC, 2004)
Norfolk Minerals Local Plan (NCC, 1996)
Norfolk Ambition – The Community Strategy for Norfolk 2003-2023 (NCC, 2003)
Norfolk Cultural Strategy – A Cultural Strategy for Norfolk 2002-2005 (NCC, 2002)
Norfolk Residential Design Guide (NCC, 1998)
Norfolk Structure Plan 1999 (NCC, 1999)

Norfolk Waste Local Plan 2000 (NCC, 2000)
Shaping the Future – Towards a Strategy for Social Cohesion in Norfolk (NCC, 2000)
Health Improvement and Modernisation Plan 2002 – 2005 (HIMP Partners 2001)
Health Improvement Plan
Norfolk Accident Reduction Strategy
Norfolk Coast Area of Outstanding Natural Beauty: Management Plan 2004-2009 (Norfolk Coast Partnership 2004)
Norfolk Minerals Local Plan (2004, final publication pending)
Norfolk Sports Development Strategy 2002-2007
Norfolk State of the Environment Report (2003)
Norfolk Waste Management Strategy
Shaping the Future: Towards a Strategy for Social Cohesion in Norfolk (2000)
<b>District</b>
Landscape Assessment, Evaluation and Guidance 2003 (LUC, 2003)
Community Strategy
Housing Strategy
A Strategy for Economic Regeneration in King's Lynn and West Norfolk (2003)
Tourism Strategy
Corporate Strategy 2003-2007
Health Improvement Plan
West Norfolk Partnership Strategic Framework (2005)
Action Plans for Air Quality Management Areas, 2005

- 3.2. It should be noted that due to the large amount of material, not all plans and programmed were reviewed in detail. Rather, the focus was on those plans which were considered the most relevant to setting the context for the development of the King's Lynn and West Norfolk Core Strategy. It was assumed that regional level plans were reviewed in the preparation and SA of the Regional Spatial Strategy, and therefore the majority of these have not been reviewed in this SA; the review instead focuses on district level plans. **Appendix 2** contains the review of those plans which were examined in detail.

## SUMMARY OF BASELINE INFORMATION

- 3.3. The SEA Directive requires the Environmental Report to provide information on “*relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme*” and “*the environmental characteristics*

of the areas likely to be significantly affected”<sup>11</sup>. The collation and reporting of this information represents Task A2 of the ODPM’s SA Guidance: Collecting baseline information.

- 3.4. Baseline information has been collected on the Borough of King’s Lynn and West Norfolk; it provides the basis for predicting and monitoring the effects of the Core Strategy, and is used to identify sustainability issues, and alternative ways of dealing with them<sup>12</sup>. Below is a summary of the baseline information collected for the production of the Scoping Report, the detail of which is presented in **Appendix 3**.

### **King’s Lynn and West Norfolk**

- 3.5. The Borough of King’s Lynn and West Norfolk covers approximately 550 square miles, and stretches from the North Sea coast and The Wash in the north, to the boundary of Wisbech in the west and Breckland Forest in the south. **Figure 3.1** shows the location of the Borough. King’s Lynn acts as both market town and regional centre, with the market town of Downham Market and the coastal market town of Hunstanton the other smaller centres.

### **Land, soil and water resources**

- 3.6. The topography of the Borough reflects the underlying geology; a low, flat, peaty landscape overlying fen deposit, and gently undulating hills over chalk uplands. This means that at no point does the topography of the Borough exceed 100m above sea level. Beyond the main settlements, the Borough is essentially rural in nature, with a large proportion of high grade agricultural land. Agricultural land classifications across the Borough are shown in **Figure 3.2**.
- 3.7. The rivers of West Norfolk are a significant feature with King’s Lynn being located at the mouth of the River Great Ouse. 90% of the rivers in the Borough are of good chemical quality, and 99% of good biological quality. Although water resource availability is not a specific issue for the Borough, the use of underground water reserves is an increasing problem across the East of England, due to rising water demand and abstraction, and the Environment Agency are encouraging a 10-25% reduction in water use in the East of England to address this<sup>13</sup>.

### **Biodiversity, flora and fauna**

- 3.8. The Borough is renowned for its important and valuable biodiversity resource. A variety of habitats have been identified as nationally important ecological areas, including salt marsh and coastal margins, estuaries, woodland, rivers, commons, breck and heathland. There are numerous internationally designated sites, including several Ramsar sites, designated as wetlands of international importance, including part of the North Norfolk Coast, The Wash and Roydon Common. The Wash is also a Special Protection Area (SPA), and both The Wash and Roydon Common and Dersingham Bog are Special Areas of Conservation (SAC). There are also six National Nature

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<sup>11</sup> The SEA Directive: European Directive 2001/42/EC (EC, 2001) (Annex I (b), (c))

<sup>12</sup> Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents. *Office of the Deputy Prime Minister*. 2005.

<sup>13</sup> Adam Ireland, Planning Liaison Officer, Environment Agency. *Pers. Comm.* 27.06.06.



Reserves (NNRs): The Wash, Holkham, Scolt Head Island, Holme Dunes, Dersingham Bog and Roydon Common and 37 Sites of Special Scientific Interest (SSSIs) in the Borough. Sites designated for their biodiversity value across the Borough are shown in **Figure 3.3**.

### **Cultural heritage and landscape**

- 3.9. West Norfolk includes part of the Norfolk Coast Area of Outstanding Natural Beauty, as well as part of the North Norfolk Heritage Coast. A landscape characterisation study identified 14 landscape types in the Borough, although the character is predominantly coastal and in-land marshes and wooded, open or settled farmland<sup>14</sup>. According to the Countryside Quality Counts classification, which describes changes in landscape quality, the Borough is split between three Landscape Character Areas: The Fens, North West Norfolk and the North Norfolk Coast. Over the period 1990-1998, The Fens and the North Norfolk Coast were subjected to limited or small scale change consistent with landscape character; and North West Norfolk was subjected to some changes inconsistent with landscape character.
- 3.10. The townscape of King's Lynn town varies from the red-brick historic core and terraced housing, to large detached housing, industrial units in industrial estates and low density, poor quality housing. The importance of the built heritage of the Borough, especially the historic core of King's Lynn, can be measured in the 42 Conservation Areas, some 1,900 listed buildings and 110 ancient monuments.

### **Climate change and air pollution**

- 3.11. King's Lynn and West Norfolk currently contributes more than the national average per capita of carbon dioxide emissions (CO<sub>2</sub>) that are giving rise to climate change. In 2003, the Borough emitted a total of 1756kt CO<sub>2</sub>, of which 472kt was domestic (compared to a National average of 385kt per district), 461kt was due to road travel, and 618kt industrial. This equates to emissions of 12.7kt CO<sub>2</sub> per capita, compared to a national average of 10.6kt CO<sub>2</sub> per capita<sup>15</sup>.
- 3.12. Climatic changes will be likely to have a variety of effects on West Norfolk. A different climate will affect farming practices, choices of crops and livestock, and may lead to arched soils which could increase erosion. Climate change may also lead to higher risks of drought, and increased water demand, which will put further pressure on water resources in the Borough.
- 3.13. Climate change is likely to increase the risk of flooding. There are considerable areas within King's Lynn and West Norfolk that are subject to fluvial flooding, as well as coastal areas at risk of tidal inundation. Rising sea levels, which are predicted to be over 6mm per year, may mean that in some coastal locations land will be lost. The Strategic Flood Risk Assessment for the Borough<sup>16</sup> identified three tidal flood risk sources (the North Sea, the Wash and the Great Ouse estuary) and seven fluvial flood risk sources (the Great Ouse, the Ely-Ouse system, the Great Ouse Relief and Cut Off Channels, the River Nar, the Middle Level arterial drainage system, the River

<sup>14</sup> Wind Turbine Development: Landscape Assessment, Evaluation and Guidance. *Land Use Consultants*. 2005.

<sup>15</sup> Experimental Statistics on Carbon Dioxide Emissions at Local Authority and Regional Level. *Defra*. 2005.

<sup>16</sup> Strategic Flood Risk Assessment for King's Lynn and West Norfolk. *Bullen Consultants*. 2005.

Gaywood and the River Nene). The assessment shows that, even with current flood defences in place, much of King's Lynn town and most of the coastal areas in the Borough (generally up to approximately 1km from the sea) are at high risk of tidal flooding. This is shown in **Figure 3.4**.

- 3.14. An air quality assessment in 2003 concluded that air quality objectives for Nitrogen dioxide and PM<sub>10</sub> were unlikely to be met. There are two Air Quality Management Areas (AQMA's) in the Borough, both in King's Lynn - South Quay was designated for fugitive PM<sub>10</sub> from port activities and Railway Road for excessive levels of annual mean NO<sub>2</sub>.

### **Healthy communities**

- 3.15. In 2001, 65% of the population of King's Lynn and West Norfolk reported their health as good, which is lower than the national, regional and county averages. Additionally, the proportion of people with a long-term limiting illness (20.5%) is higher than the national, regional and county averages. The highest life expectancy in the Borough is 84.7 years for males in Springwood ward and 88.1 years for females in Burnham ward, and the lowest 74.6 for males Fairstead ward and 78.6 years for females in North Lynn ward.

### **Inclusive communities**

- 3.16. The population of King's Lynn and West Norfolk of 137,900 in 2003 is expected to rise to 156,900 by 2026; an increase of 14.5%, which is higher than the average for Norfolk of 10.9%. In mid 2003, the population of the Borough was 137,900, of whom 5 per cent were children under five and 25 per cent were of retirement age (65 and over for males or 60 and over for females). The equivalent figures for England and Wales overall were 6 per cent under five and 19 per cent of retirement age. The overwhelming majority of the population of King's Lynn and West Norfolk (98.6%) are ethnically white, which is higher than the national average of 90.9%.
- 3.17. 10.7% of all housing built in the Borough in 2004/05 fell under the definition of 'affordable', compared to a National average of 24%; the proportion of affordable housing built has decreased over recent years. The 2002 Housing Needs Survey estimated an increase of 790 households per year in the Borough, and that of these approximately 400 households will be in housing need. House prices in King's Lynn and West Norfolk have increased by almost 200% since 1995, and by 100% since 2001. King's Lynn has the second highest proportion of second homes in the East of England (4%), and in the Area of Outstanding Natural Beauty this rises to 15%. Housing in King's Lynn and West Norfolk is skewed towards large detached and semi-detached properties, particularly in the AONB<sup>17</sup>.
- 3.18. King's Lynn and West Norfolk is an area of relatively high deprivation; three of the eight wards in King's Lynn town, North Lynn, Fairstead and Gaywood Chase, are in the most deprived 10% in England. 19.1% of all dependent children in the Borough live in lone parent families (ranked 16<sup>th</sup> highest out of 48 nationally). The proportion

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<sup>17</sup> Norfolk Coast Area of Outstanding Natural Beauty: The Housing Market and Affordable Housing. *Three Dragons*, Jane Smith, B. Line Housing information, Dr Andrew Golland. 2005.

of the working population with low literacy, and the proportion of the population with no qualifications are also higher than at regional and county level, and are particularly high in King's Lynn. **Figure 3.5** shows indices of multiple deprivation across the Borough.

- 3.19. Crime levels are significantly below the average for England and Wales, with highest crime rates being for theft from a motor vehicle and violence against the person.

### **Economic activity**

- 3.20. 4.7% of people of working age in the Borough were unemployed in 2003-04. A large proportion of people in King's Lynn and West Norfolk are employed in low skilled occupations; 14.9% are employed in elementary occupations and 14.1% are employed as process plant and machine operatives, compared with the national rates of 11.8% and 7.7% respectively. The low-skills base of the Borough is reflected in relatively low earnings, with full-time workers in King's Lynn earning an average of £408.80 per week, compared with £508.80 in the Eastern region as a whole. Employment and income deprivation in the Borough are shown in **Figure 3.6 and 3.7**.

## **LIMITATIONS AND ASSUMPTIONS OF BASELINE INFORMATION**

- 3.21. The main difficulty encountered with the baseline information when attempting to carry out the appraisal of the plan was the fact that there were some gaps and areas to be strengthened exist in baseline data. Whilst additional studies and plans reviewed and responses to the Scoping Report have helped to improve the baseline information, some data is still lacking.
- 3.22. The gaps in the baseline information collected are set out in the detailed analysis in **Appendix 3**. The most significant gaps in the baseline information are:
- Numbers and locations of waste management and recycling facilities in the Borough;
  - Condition of SSSIs (this is to be pursued with English Nature);
  - Numbers, locations and condition of designated sites other than SSSIs;
  - Viable levels of these characteristic habitats and species, and current levels in relation to these;
  - Description of townscape character outside King's Lynn town;
  - Levels of use of public transport and alternative modes of transport for industrial/freight transport;
  - Information on renewable energy generated and used in the Borough;
  - Energy efficiency of developments within the Borough;
  - Air, soil, noise, light and vibration pollution sources and trends;

- Information on the causes and fear of crime within the Borough;
- Type, quantity and accessibility of services and facilities within the Borough;
- Amount of inward investment into the Borough.

## KEY SUSTAINABILITY ISSUES

- 3.23. The SEA Directive requires the provision of information on “*any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC*”<sup>18</sup>. The identification of these issues represents Task A3 in the ODPM’s SA Guidance: Identifying sustainability issues and problems. The baseline information above and in **Appendix 3** have been used to identify the key sustainability issues facing King’s Lynn and West Norfolk. These issues are set out in **Table 3.2**, below.
- 3.24. The Directive also requires information on “*the environmental characteristics of the areas likely to be significantly affected*”<sup>19</sup>. The areas most likely to experience change are identified in the LDF Core Strategy as King’s Lynn, Downham Market, Hunstanton and the Rural Areas of the Borough. The key sustainability issues for the Borough have been broken down according to the areas likely to be affected by the issue, which provides a characterisation of each of the areas. This information is set out in **Table 3.2**, below.
- 3.25. **Table 3.2** also identifies the “*relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme*”<sup>20</sup>, as required by the SEA Directive, as well as the role that the Core Strategy could play in affecting the issue.

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<sup>18</sup> The SEA Directive: European Directive 2001/42/EC (EC, 2001) (Directive Annex I d)

<sup>19</sup> The SEA Directive: European Directive 2001/42/EC (EC, 2001) (Directive Annex I c)

<sup>20</sup> The SEA Directive: European Directive 2001/42/EC (EC, 2001) (Directive Annex I b)

**Table 3.2 Key sustainability issues affecting King's Lynn and West Norfolk, their likely evolution without the implementation of the Core Strategy, and the potential influence of the Core Strategy**

Sustainability Problem/ Issue	Likely evolution without the implementation of the plan	Potential influence of the Core Strategy	Areas affected					SA Objective which addresses this issue
			Borough	King's Lynn	Downham Market	Hunstanton	Rural Areas	
Much of the Borough is low-lying, meaning that it may be at risk of flooding. Coastal locations are particularly at risk.	Policies in the existing Local Plan aim to maintain flood defences, and restrict development in the flood plain. However, the Borough will remain low-lying, and climate changes are likely to lead to an increase in water levels and therefore flood risk.	The Core Strategy could play a role in maintaining and extending flood defences and restricting development in the floodplain, however, other organisations such as the Environment Agency are likely to have a significant influence.	✓	✓		✓	✓	4.3
There is a potential lack of water resources due to over abstraction, and climate change leading to decreased water availability.	Potential lack of water resources would be likely to increase due to increased housing development in the Borough leading to increased demand, as there are no specific policies in the existing Local Plan to reduce water abstraction.	The Core Strategy could help to reduce water demand (e.g. through encouraging water efficiency in developments) but other plans, such as the Anglian Water Water Resource Plan, are likely to have a larger effect on water resources.	✓					1.3
The Borough is renowned for its wildlife and natural resources, which should be protected from any negative impacts of development.	Protection of wildlife and natural resources would be likely to continue despite increased development pressure as there are specific policies in the existing Local Plan to protect habitats and landscapes.	The Core Strategy can have some impact on protecting the wildlife and natural resources of the Borough, by locating development away from sensitive areas. However, farming practices and other land use activities are likely to have a larger effect on the wildlife and natural resources of the Borough.	✓				✓	2.1, 2.2
The Borough has a large number of designated sites protecting habitats and species.	The protection of designated habitats and species would be continued under Policies 4/1, 4/5 and 4/6 of the existing Local Plan.	The Core Strategy is likely to continue to play a major role in directing development away from designated sites. Under the Habitats Directive, there should be no adverse impacts on Natura 2000 sites arising as a result of the Core Strategy.	✓					2.2
The Borough contains	The Norfolk Coast AONB would	The Core Strategy should play a major role in	✓			✓	✓	3.1

Sustainability Problem/ Issue	Likely evolution without the implementation of the plan	Potential influence of the Core Strategy	Areas affected					SA Objective which addresses this issue
			Borough	King's Lynn	Downham Market	Hunstanton	Rural Areas	
part of the Norfolk Coast Area of Outstanding Natural Beauty, which will require protection.	continue to be protected under policy 4/5 of the existing Local Plan, which would limit development in the coastal areas of the Borough.	protecting the AONB from development.						
Greenhouse gas emissions from the Borough are contributing to climate change, and are higher than the national average.	Climate change is a global issue, and is likely to continue with or without the implementation of the plan. The Borough's contribution to greenhouse gas emissions is likely to increase.	The Core Strategy can play a role in reducing climate change by reducing the Borough's emissions of greenhouse gases through a variety of measures including reducing the need to travel and encouraging travel by modes of transport other than the car and by encouraging energy efficiency in built development plus the promotion of renewable sources of energy.	✓					4.1
Air Quality targets are unlikely to be met for nitrogen dioxide and PM <sub>10</sub> .	Air quality would be likely to continue to be low, as there are no policies in the Local Plan to improve it, and increased development would be likely to further decrease air quality.	The Core Strategy could play a role in improving air quality through, for example, locating development to reduce travel, but other plans, including the local transport plan, are likely to have more of an effect.	✓	✓				4.1
There are higher proportions of people living with limiting long term illnesses in the Borough than the national, regional or county averages.	High levels would be likely to continue in the absence of any specific policies in the existing local plan to address this issue.	The Core Strategy can support the provision of health facilities and services, and healthy lifestyles (e.g. by providing areas of greenspace, and making walking and cycling attractive transport options) but health-specific plans, such as the Health Improvement Plan are likely to have a larger effect.	✓					5.1
The difference in life expectancy between the best and worst wards in	Likely to continue in the absence of any specific policies in the existing local plan to address this issue.	The Core Strategy could influence this issue by providing more equal health care facilities, but health-specific plans, such as the Health	✓					5.1

Sustainability Problem/ Issue	Likely evolution without the implementation of the plan	Potential influence of the Core Strategy	Areas affected					SA Objective which addresses this issue
			Borough	King's Lynn	Downham Market	Hunstanton	Rural Areas	
the Borough is over 10 years, representing significant health inequalities.		Improvement Plan are likely to have a larger effect.						
The Borough has been identified as an area of high deprivation; three of the eight wards in King's Lynn are in the most deprived 10% in England.	Deprivation would be likely to decrease as the existing Local Plan aims to provide for the development needs of the local economy and community.	The Core Strategy could contribute to decreasing deprivation, but external factors, as well as other social and economic plans for the Borough, will also play a large role.	✓	✓				6.2
There is a low proportion of affordable housing developed in the Borough.	The existing Local Plan aims for the inclusion of 30% affordable housing within developments. The data on the development of affordable housing shows that this target was not met in 2004/05, and that affordable housing development levels were decreasing up to this point. Therefore it can be assumed that the target would be unlikely to be met, and that the provision of affordable housing would remain low.	The Core Strategy will play an important role in allocating land for affordable housing developments, and ensuring that targets set in the Regional Spatial Strategy are met.	✓					6.3
There is a high level of employment in agriculture and manufacturing in the Borough, compared with other districts in Norfolk, and Britain in	The focus on agricultural employment would be likely to decrease due to the existing Local Plan's policy to provide employment land in the urban areas of King's Lynn and Downham Market.	The Core Strategy could have some effect on the levels of employment in different sectors, but other influences such as the external economy are likely to have more of an impact.	✓				✓	7.1

Sustainability Problem/ Issue	Likely evolution without the implementation of the plan	Potential influence of the Core Strategy	Areas affected					SA Objective which addresses this issue
			Borough	King's Lynn	Downham Market	Hunstanton	Rural Areas	
general, reflecting the focus on low-skilled employment sectors.								
Average earnings in the Borough are lower than both the national and regional averages.	Average earnings in the Borough would be likely to increase under the Local Plan's policies to develop the Borough's economy.	The Core Strategy could help to develop the Borough's economy to influence earnings, but the external economy is likely to have more of an impact.	✓					7.2
King's Lynn is under performing in terms of services, the economy, housing and tourism given its role as a significant centre.	Underperformance of service provision would be likely to continue, as the existing Local Plan does not include any policies to increase service availability in King's Lynn.	The Core Strategy would be likely to play an important role in increasing service provision and developing the economy and tourism, and it will have a key influence in determining housing provision.		✓				6.1, 7.2, 6.3
Some areas of King's Lynn town centre appear uncared for and unsafe.	Areas of King's Lynn town would be likely to improve under policies for regeneration in the existing local plan.	The Core Strategy would play a key role in improving the layout, design and appearance of the town centre.		✓				3.3
An increase in residential development in Downham Market has led to the town outgrowing its compact market town characteristics and facilities.	The increase in residential development would increase under various policies in the existing Local Plan. The existing Local Plan would continue to see Downham Market as a compact market town, and the mis-match in scale between the size of the town and its facilities would be likely to continue.	The Core Strategy could play a large role in increasing the provision of facilities and services in Downham Market for the growing population to reduce the mis-match between the size of the town and its level of service provision.			✓			6.1
Downham Market has suffered from a number of years of under-investment, and is in need of improvement of	Investment in Downham Market would be likely to increase under various policies in the existing Local Plan. However, in the absence of specific policies on improving the visual amenity	The Core Strategy could play a significant role in increasing investment in Downham Market. It will have a key influence on the improvement of the visual amenity of the town, and could help to regenerate the			✓			6.1, 3.3



Sustainability Problem/ Issue	Likely evolution without the implementation of the plan	Potential influence of the Core Strategy	Areas affected					SA Objective which addresses this issue
			Borough	King's Lynn	Downham Market	Hunstanton	Rural Areas	
its visual amenity and regeneration of the economy.	and economic regeneration of the Town, these would be unlikely to improve.	economy, though external factors will also play a large role.						
Hunstanton, and other coastal locations, have significant retired populations, which creates an imbalance in the age structure.	The imbalance of population is likely to continue, in the absence of policies in the existing Local Plan to address this.	The Core Strategy is unlikely to have a large effect on the population structure of Hunstanton, but could play a role in making the town more attractive for young people. The LDF could also play a role in responding to the problems of an ageing population, for example the demands on health services, but other plans, including the Health Improvement Plan, are likely to have a larger effect.				✓		6.2
The seasonal nature of visitors to Hunstanton and other coastal locations lead to variations in population and demands on local services.	Likely to continue due to policies in the existing Local Plan to reinforce Hunstanton's role as a tourist destination.	The Core Strategy can play some role in encouraging year-round tourists and other industries, but would be unlikely to be able to influence the seasonal variations in population due to tourism.				✓		6.1
The role of Hunstanton and other coastal locations as seaside resorts means there is large seasonal variation in employment opportunities and income in the town.	Likely to continue due to policies in the existing Local Plan to reinforce Hunstanton's role as a tourist destination.	The Core Strategy can play some role in reducing variability in employment and income by encouraging year-round tourists and other industries.				✓		7.1
The isolated rural nature of parts of the	Likely to continue due to policies to protect the rural nature of the	The Core Strategy can play a significant role in affecting the accessibility of services and	✓				✓	6.1

Sustainability Problem/ Issue	Likely evolution without the implementation of the plan	Potential influence of the Core Strategy	Areas affected					SA Objective which addresses this issue
			Borough	King's Lynn	Downham Market	Hunstanton	Rural Areas	
Borough leads to inaccessibility of essential services and facilities.	countryside, although policies do allow for development of essential community facilities.	facilities in the rural areas of the Borough, but viability could also have a major influence.						
Increasing rural populations are increasing demand for housing and service provision in the countryside.	Likely to continue to increase, due to continuing attractiveness of rural lifestyles.	The Core Strategy is unlikely to be able to influence the demand for rural lifestyles, but could play a large role in responding to the increased demand for housing and service provision.					✓	6.1

## SUSTAINABILITY APPRAISAL FRAMEWORK

- 3.26. The SA Framework is the methodological yardstick by which a plan's potential economic, social and environmental effects may be assessed. The SA Framework consists of sustainability objectives, which may, where appropriate, be expressed in the form of targets. The SA Framework was developed by the Borough Council of King's Lynn and West Norfolk, based on the environmental, social and economic objectives of relevance to the Local Development Framework identified in the plan and programme review<sup>21</sup>. The development of the SA Objectives, from the relevant plans, programmes and policy objectives reviewed, is set out in **Appendix 4**.
- 3.27. The SA Objectives which make up the SA Framework, as revised to take into account consultees' comments on the Scoping Report, are set out in **Table 3.3** below.

**Table 3.3 The SA Framework**

Topic	Objective
1. Land and water Resources	1.1 Minimise the irreversible loss of undeveloped land and productive agricultural holdings
	1.2 Minimise waste and reduce the use of non-renewable energy resources
	1.3 Limit water consumption to levels supportable by natural processes and storage
2. Biodiversity	2.1 Avoid damage to designated and undesignated sites and protected species
	2.2 Maintain and enhance the range and viability of characteristic habitats and species
3. Landscape, townscape and archaeology	3.1 Avoid damage to protected sites and historic buildings
	3.2 Maintain and enhance the diversity and distinctiveness of landscape and townscape character
	3.3 Create places, spaces and buildings that work well, wear well and look good
4. Climate change and pollution	4.1 Reduce emissions of greenhouse gases and other pollutants (including water, air, soil, noise, vibration and light)
	4.2 Minimise waste production and support the recycling of waste products
	4.3 Limit or reduce vulnerability to the effects of climate change (including flooding)

<sup>21</sup> King's Lynn and West Norfolk Local Development Framework Sustainability Appraisal Scoping Report. Borough Council of King's Lynn and West Norfolk, 2005.

Topic	Objective
5. Healthy communities	5.1 Maintain and enhance human health
	5.2 Reduce and prevent crime, and reduce the fear of crime
	5.3 Improve the quantity and quality of publicly accessible open space and improve access to the wider countryside
6. Inclusive communities	6.1 Improve the quality, range and accessibility of services and facilities (e.g. health, transport, education, training, leisure opportunities)
	6.2 Redress inequalities related to age, gender, disability, race, faith, location and income
	6.3 Ensure all groups have access to decent, appropriate and affordable housing
	6.4 Encourage and enable the active involvement of local people in community activities
7. Economic activity	7.1 Help people gain access to satisfying work appropriate to their skills, potential and place of residence
	7.2 Improve the efficiency, competitiveness and adaptability of the local economy

## **INFLUENCE OF THE SA ON THE CORE STRATEGY PREFERRED OPTIONS**

- 3.28. The SA of the Core Strategy Preferred Options is an iterative process. Early work undertaken on the SA by the Borough Council helped to inform the overall spatial strategy that should provide the framework for the Core Strategy Policy Preferred Options.
- 3.29. Since this was undertaken, Land Use Consultants have been working closely with Council officers as the Preferred Options were being prepared. This included early sight of the Preferred Options Topic Papers (now chapters of the Core Strategy). These early drafts were appraised and a number of recommendations for improvement made. The recommendations included an overall commentary, a series of 'tracked changes' of suggested rewording of text, and specific aspects where it was felt that improvements could be made (including the need to consider alternatives to the Preferred Options).
- 3.30. Following submission of the draft Core Strategy Preferred Options Paper to the Members of the Borough Council of King's Lynn and West Norfolk in August 2006, changes have been made to the several policies in the Preferred Options. In general, these were minor amendments which did not affect the sustainability performance of the Core Strategy. However, some changes made had major effects on the substance of the policy. In some cases, the previous Preferred Option has been identified as a Rejected Option, and the reasons for its rejection have been discussed in the

Preferred Options paper. However, in some cases the change has been made without explicitly setting out the reasons for rejecting the previous Preferred Option. In all cases where the changes proposed by the Council Members had substantial effects on the policy, the Previous Preferred Option has been identified in the SA of the Options, and appraised for its sustainability implications alongside the other options considered, set out in Appendices 5 and 6.

- 3.31. In preparing the final draft of the Core Strategy Preferred Options, some of the recommendations have been taken on board. Where this is the case, a record has been made in Appendices 5 and 6 of the SA Report (with the exception of where recommendations were in the form of 'tracked changes').
- 3.32. Not all recommendations have been reflected in the Core Strategy Preferred Options, and these are listed in the main body of the SA Report, as well as in Appendices 5 and 6. Council officers are considering these outstanding recommendations, and will respond to them when also responding to consultation comments on the Preferred Options, between the Preferred Options stage and the submission stage of the Core Strategy. A record will be made of how they are to be dealt with at the time of submission of the draft Core Strategy to the Secretary of State.

## 4. PLAN OBJECTIVES, ISSUES AND OPTIONS

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### TESTING PLAN OBJECTIVES AGAINST SA OBJECTIVES

- 4.1. The Objectives of the Core Strategy were developed to create a vision for the Borough until 2021. The King's Lynn Objectives were developed from the Llewellyn Davies Yeang Urban Renaissance Strategy, and the Downham Market and Hunstanton Objectives are the product of public consultation exercises carried out in November 2005 and January 2006 respectively.
- 4.2. Each of the Core Strategy Objectives was tested against the objectives in the SA Framework (see **Table 3.3** above). This was to check that the objectives of the Core Strategy are in accordance with sustainability principles. The full appraisal of the compatibility of the plan objectives with the SA Objectives is set out in **Appendix 5**, and the findings are summarised below.
- 4.3. In appraising the objectives a number of assumptions have been made about how the objectives may be implemented through policy. For this reason, the appraisal of objectives should be treated only as a broad appraisal of areas of compatibility or conflict. Recommendations for improving the consistency between the Plan Objectives and the SA Objectives are also made. The appraisal process helps to highlight potential inconsistencies and synergies between the objectives which need to be recognised in the preparation of the Core Strategy. In many cases, however, apparent inconsistencies between the objectives would be relieved through the implementation of Objectives or Policies from other parts of the Core Strategy. In these cases, it has been assumed that these Objectives or Policies will be implemented effectively, and it was therefore not considered necessary to recommend changes to the Objectives to address these tensions.

### Spatial Objectives

- 4.4. The Spatial Objectives of the King's Lynn and West Norfolk Core Strategy are:
  1. Maintain, protect and enhance the special qualities of the Borough that contribute towards our distinctiveness and quality of life, especially our coast, countryside, landscape, habitats, historical and architectural heritage;
  2. Enable new development that respects the distinctiveness of our area while maximising the potential of our towns;
  3. Provide adequate and appropriate opportunities for housing, jobs, shopping, leisure and tourism activities and to create a thriving and sustainable economy that generates wealth;
  4. Develop King's Lynn as a sub-regional centre – a major centre for housing, commercial, employment and leisure activities serving West Norfolk and surrounding areas;
  5. Promote sustainable development, using sustainable construction methods, making more use of previously developed land and using land more efficiently in locations with good services;

6. Help to develop sustainable and cohesive local communities.

### **Synergies**

- 4.5. The focus of several of the Spatial Objectives on locating development in and around King's Lynn and other service centres and maximising the use of previously developed land are compatible with SA Objective 1.1, to minimise the loss of undeveloped land. Locating most development around towns and service centres is also compatible with SA Objective 2.1 to avoid designated sites, as there are none near to the main towns in the Borough. Additionally, focussing development on King's Lynn, to develop it as a sub-regional centre, is compatible with SA Objective 7.2 to improve the local economy.
- 4.6. Strategic Objective 2 aims to protect the special qualities of the Borough, which is compatible with SA Objectives 2.1, to avoid damage to designated sites and protected species, and 3.1, to avoid damage to designated sites and historic buildings, and 3.2, to maintain landscape and townscape character.
- 4.7. Strategic Objective 3 and 6 are compatible with several SA Objectives as they aim to improve the local economy and strengthen social cohesion and the provision of services and facilities. These are directly compatible with SA Objectives to improve human health, reduce crime, improve the quality and accessibility of services and facilities. Strategic Objective 3 also aims to improve greenspace provision, and increase job opportunities, which are compatible with SA Objectives 5.3 and 7.1.

### **Inconsistencies**

- 4.8. Spatial Objective 3 aims to increase the amount of jobs and homes in the Borough, which is potentially inconsistent with the SA Objectives to minimise waste production, energy and water use.
- 4.9. The aims of the Spatial Objectives to focus development on King's Lynn could potentially be in conflict with SA Objectives 3.1, to avoid damage to historic buildings, given the high cultural value of King's Lynn town centre, and 4.3, to reduce vulnerability to climate change, as much of King's Lynn is a high flood risk zone.
- 4.10. Restricting development in sensitive areas and trying to protect the special qualities of the Borough may lead to a pattern of development that is not the most efficient in terms of reducing the need to travel, improving the accessibility of services and ensuring that all groups across the Borough have access to housing. The Spatial Objectives that support these aims may therefore conflict with SA Objectives 4.1, 6.1 and 6.3.

### **Recommendations**

- The Spatial Objectives should clarify what is meant by the 'distinctiveness' of the Borough; specifically whether this includes the distinctive high natural resource value;
- Spatial Objective 4 could be reworded to further emphasise the provision of sustainable transport;

- The focus of development on King's Lynn, given its high risk of tidal flooding should be evaluated against the sustainability advantages and disadvantages of guiding development to areas less at risk of flooding.;
- The Spatial Objectives could be made more compatible with the SA Objectives by making some reference to encouraging the involvement of people in local community and planning activities.

### **Previous appraisal of the emerging Core Strategy Objectives**

4.11. The emerging Strategic Objectives of the Core Strategy were tested for compatibility with the emerging SA Objectives by the Borough Council as part of the Sustainability Appraisal of the Issues and Options Paper carried out in June 2005. The SA Objectives and the Core Strategy Objectives are slightly different to those in this SA Report, and therefore required reappraisal, as set out below. However, when comparing the results of the appraisal carried out by the Council with the results of the compatibility appraisal carried out in this SA, a number of differences can be noted, including:

- The appraisal of the Strategic Objectives of the Core Strategy carried out in this SA notes that locating development to protect the special qualities of the Borough may not lead to the most efficient patterns of development, and may lead to increases in the need to travel, and therefore increases in emissions of greenhouse gases. The Borough Council's appraisal of the emerging Core Strategy Objectives did not note this.
- The Borough Council's appraisal of the Core Strategy Objectives noted that development, even that which '*respects the distinctiveness of the Borough*', could have negative effects on biodiversity, whereas the appraisal of the Core Strategy Objectives in this SA states that it is not clear what respecting the distinctiveness of the Borough means, and that therefore its compatibility with the protection of biodiversity value is uncertain. It is recommended that this is clarified.
- The Borough Council's appraisal concludes that requiring development to '*respect the distinctiveness of the Borough*' would limit the amount of development in rural areas, and may therefore cause conflict with the SA Objectives which aim to provide services and develop the economy in rural areas. The appraisal in this SA Report indicates that it is unclear whether respecting the distinctiveness of the Borough would definitely lead to the restriction of development in rural areas.
- The appraisal carried out as part of this SA Report recognises that providing opportunities for housing, jobs, shopping, leisure and tourism are likely to lead to increases in waste production, energy, and water use, which the Council's appraisal did not recognise.
- The appraisal in this SA Report acknowledges several of the sustainability benefits of focussing development on King's Lynn, for example on minimising the loss of greenfield land by guiding development away from rural areas, and on protecting designated sites, none of which are located in King's Lynn town.



## **Spatial Strategy for King's Lynn**

- 4.12. The objectives of the Spatial Strategy for King's Lynn in the Core Strategy are set out under the following headings:

1. Built environment;
2. Transport and movement;
3. Economy;
4. Social inclusion;
5. Viability;
6. Sustainability.

### **Synergies**

- 4.13. The King's Lynn Objectives aim to develop King's Lynn in a sustainable manner, by developing brownfield over greenfield land, encouraging recycling, and increasing greenspace provision, which are compatible with SA Objectives 1.1, to minimise the loss of greenfield land, 1.2 and 4.2 to minimise waste production and 2.2 and 5.3 to increase the viability of habitats and species and the provision of open space.
- 4.14. Several of the King's Lynn Objectives aim to diversify the economy and increase employment opportunities, which are directly compatible with SA Objectives 7.1 and 7.2, to increase access to work and improve the local economy.

### **Inconsistencies**

- 4.15. The King's Lynn Objectives aim to provide for significant growth in the town, but do not mention attempting to reduce water use, which could raise a tension with SA Objective 1.3 to limit water consumption. Additionally, as much of King's Lynn is in a high flood risk zone, the Objectives' aim for large amounts of development to take place within the town could potentially be in conflict with SA Objective 4.3, to limit vulnerability to climate change and flooding.

### **Recommendations**

- 4.16. The King's Lynn Objectives could be made more compatible with the SA Objectives by:
- Referring to the minimising the use of non-renewable energy resources, such as vehicle fuel and Combined Heat and Power (CHP). King's Lynn is the only centre in the borough of a suitable size to be able to make a significant switch from the private car to non-car modes of travel, and offers advantages for the production and use of some renewable energy sources;
  - Referring to protecting and designated sites close to King's Lynn, e.g. Roydon Common, Dersingham Bogs and The Wash;
  - Including other measures to improve health, including the provision of affordable, decent housing and increasing access to health services;

- The King's Lynn Objectives could be improved by making specific reference to improving access by non-car modes to health, transport, education, training, leisure and employment opportunities and services in the town;
- Aiming to address inequalities related to age, gender, disability, race, faith, location and income;
- Setting out levels of affordable housing provision;
- The Economy Objective (King's Lynn Objective 3) could include more reference to the inherent attributes of King's Lynn; there is currently little that reflects the attributes of King's Lynn specifically, except the mention of tourism.

### **A Spatial Strategy for Downham Market**

4.17. The objectives of the Spatial Strategy for Downham Market in the Core Strategy are set out under the following headings:

1. Regeneration;
2. Sustainability;
3. Improving choice;
4. Improving image;
5. Tackling social deprivation.

### **Synergies**

- 4.18. The Downham Market Objectives aim to limit extensions to the town, and to protect its natural environment, and promote good and innovative design in development, which are directly compatible with SA Objectives 1.1, to minimise the loss of undeveloped land, 2.2, to protect and enhance habitats and species, and 3.3, to create places, spaces and buildings that work well, wear well and look good.
- 4.19. The Downham Market Objectives aim to increase access to services, including health facilities, and to meet housing need in the town, which are compatible with SA Objectives to improve the quality, range and accessibility of services and facilities, and ensure all groups have access to housing. Additionally, Downham Market Objective 1 aims to provide land for the needs of business, which is compatible with SA Objectives 7.1 and 7.2, to help people gain access to work, and to improve the economy respectively.

### **Inconsistencies**

- 4.20. Few unmitigated inconsistencies with the SA Objectives were identified in the Downham Market Objectives. The built development referred to in several of the Downham Market Objectives could potentially impact on the townscape, cultural heritage and historic buildings in the town and thereby potentially conflict with SA Objectives 3.1 and 3.2, although the Downham Market Objectives do also aim to protect the historic environment of the town, which should resolve any possible tensions.

### **Recommendations**

- 4.21. The Downham Market Objectives could be made more compatible with the SA Objectives by:
- Making specific reference to enhancing as well as protecting the natural environment and biodiversity in the town;
  - Making more reference to encouraging high quality design such as the use of local materials;
  - Making clearer how adapting to climate change and flood risk will be achieved;
  - Referring to other means of improving health, such as improving air quality, encouraging walking and cycling, and increasing access to greenspace;
  - Including reference to 'designing-out' crime;
  - Including a specific reference to increasing access to greenspace and the countryside;
  - Making reference to involving local people in community activities;
  - Making more explicit reference to increasing satisfying work opportunities for residents, appropriate to their skills, potential and place of residence;
  - Making more explicit reference to increasing the efficiency, competitiveness and adaptability of the local economy.

### **A Spatial Strategy for Hunstanton**

- 4.22. The objectives of the Spatial Strategy for Hunstanton in the Core Strategy are set out under the following headings:
1. The environment;
  2. Accessibility;
  3. The economy;
  4. Our community.

### **Synergies**

- 4.23. Hunstanton Objective 1 aims to protect the natural and historic environment of the town, which is directly compatible with SA Objectives 2.1, 2.2, 3.1 and 3.2 which aim to reduce damage to designated sites, habitats and species and historic assets. The Hunstanton Objectives also aim to protect open space, which is compatible with the SA Objectives to protect habitats and species, and improve human health.
- 4.24. The Hunstanton Objectives support the growth of services and infrastructure in the town, which is compatible with SA Objective 6.1 to increase the quality and accessibility of services. Additionally, the Hunstanton Objectives aim to promote new investment and establish year round employment, which is important in Hunstanton which is traditionally a coastal tourist town, and is compatible with SA

Objectives 7.1 and 7.2, which aim to provide access to jobs and improve the local economy.

### ***Inconsistencies***

- 4.25. Few unaddressed tensions with the SA Objectives were identified between the Hunstanton Objectives and the SA Objectives. However, Hunstanton Objective 2 aims to increase access to the Norfolk Coast AONB, which could potentially be in conflict with SA Objective 2.1, to avoid damage to designated biodiversity sites that are associated with the AONB. The Hunstanton Objectives also aim to improve road access to the town, which could potentially increase road traffic, and therefore conflict with SA Objective 4.1, to reduce emissions of greenhouse gases and other pollutants.

### ***Recommendations***

- 4.26. The Hunstanton Objectives could be made more compatible with the SA Objectives by:
- Removing the intention to improve the A149, or clarifying whether this would lead to increases in road capacity and hence traffic;
  - Hunstanton's coastal location means its environs particularly at risk from tidal flooding, although there are flood defences around the town (and the town itself is on higher ground), and coastal erosion. The Hunstanton Objectives could be made more compatible with the SA Objectives by acknowledging the risks of climate change, flooding and erosion, including references to strategies for dealing with these risks;
  - Making more reference to redressing inequalities, particularly in relation to age due to the large retired population in Hunstanton;
  - Explaining more fully what a controlled and clear approach to development in Hunstanton would involve.

### ***Spatial Strategy for the Rural Areas***

- 4.27. The Objectives for the Spatial Strategy for the Rural Areas are set out under the following headings:
1. Housing;
  2. Employment;
  3. Sustainability;
  4. Environmental enhancement;
  5. Improving choice.

### ***Synergies***

- 4.28. Rural Areas Objective 4 aims to protect best and most versatile (BMV) agricultural land, natural and historic environment and wildlife in the Borough, which are

compatible with SA Objectives 1.1, 2.1, 2.2, 3.1 and 3.2 to protect undeveloped land, designated sites, habitats and species and historic assets.

- 4.29. By aiming to provide development in sustainable locations, and to provide local services and facilities in the key centres, the Rural Areas Objectives should reduce the need (if not the desire) to travel, and are therefore compatible with the SA Objectives to reduce emissions of greenhouse gases and other pollutants, and therefore protecting human health, and increasing access to services and facilities.
- 4.30. Aiming to retain employment in rural areas, and encourage growth in the rural economy are consistent with SA Objectives 7.1 and 7.2 to provide access to jobs and improve the local economy.

### ***Inconsistencies***

- 4.31. Rural Areas Objectives 1, 2, 3 and 5 aim to provide development in the Borough's rural areas for housing, employment, renewable energy schemes and services, which could potentially raise a tension with SA Objectives 1.1, to minimise the loss of undeveloped land, 2.1, to limit damage to designated sites and protected species, 2.2, to protect and enhance habitats and species, and 3.2, to protect landscape character.
- 4.32. Rural Area Objective 4's aim to protect the environment in rural areas of the Borough could potentially conflict with SA Objectives 6.3, 7.1 and 7.2 which aim to provide housing and jobs and improve the economy in rural areas.

### ***Recommendations***

- 4.33. The Rural Areas Objectives could be made more compatible with the SA Objectives by:
- Referring specifically to locating development away from designated sites as there are many in the rural areas of the Borough;
  - Referring to protecting landscapes, particularly the Norfolk Coast AONB;
  - Making more reference to encouraging high quality design;
  - Acknowledging the risks of climate change and flooding, especially in the coastal rural areas of the Borough, including references to strategies for dealing with these risks;
  - Considering supporting employment in activities that are directly linked to sustainable land management in rural and coastal locations, including agriculture and enhancement of landscapes and biodiversity;
  - Deleting the reference to renewable energy schemes being located where they could be 'economically viable'.

## **MAIN STRATEGIC OPTIONS CONSIDERED**

- 4.34. The Borough Council produced an Issues and Options Paper in June 2005. This outlined the main issues facing the Borough, as identified through public consultation.

From these issues, three options for the development of the Borough, and particularly housing allocation, were put forward:

- Option 1 - Concentrated strategy: A concentrated development strategy, where King's Lynn would be developed as a sub-regional centre;
- Option 2 - Town growth strategy: King's Lynn, Downham Market and Hunstanton would be areas for major growth;
- Option 3 - Geographic spread: Development would be more evenly distributed across the Borough;
- Option 4 - Do Nothing: Do not allow economic or social development in the Borough. This was not considered as a viable option in the Issues and Options Paper, but was evaluated as a plausible alternative to be appraised

## **APPRAISAL OF OPTIONS**

### **Strategic development options**

- 4.35. The Borough Council carried out an SA in broad terms of the effects of the main strategic options in conjunction with production of the Issues and Options Paper, produced in June 2005. The key findings of this SA, as presented in the Issues and Options Paper are set out below.

#### **Option 1: Concentrated Strategy**

- 4.36. *"This option would be paramount in developing King's Lynn as a sub-regional centre focussing a large amount of its housing development within the settlement of King's Lynn, placing a much larger emphasis on more sustainable forms of construction development and travel, improving the quality of life. This option could be particularly innovative about renewable energy, water and other natural resources as well as the large emphasis on inward investment into economic development. The general location of housing would prove useful to enable more sustainable patterns of movement around the town and contribute to more sustainable means of transport, contributing to a reduction in pollution. The option is in line with National Government Policy, the Regional Spatial Strategy and the Corporate Policy of King's Lynn and West Norfolk. Whilst the major developments are designed under this strategy to be located within King's Lynn, any further concentration around the periphery through greenfield allocations, could question both the sustainability of these locations in terms of transport links and accessibility to the town centre, and the degrading of the landscape of the surrounding countryside, as well as the loss of any habitats of flora and fauna deemed to be of local importance. Any development provided in the other towns of Downham Market and Hunstanton needs to take account of the character of these settlements to preserve their character and distinctiveness. An issue of concern connected to this option is that a large area of King's Lynn is exposed to flood risk, this could have implications for the allocation of housing development. However, this impact could be mitigated by appropriate prevention measures incorporated into any design. In addition the restrictive nature of housing development in the villages purely to sustain local services and facilities and provide affordable housing, whilst enhancing and preserving the special quality and character of these villages, may well lead to problems of social exclusion and the loss of local employment sites by not allowing appropriate development in these locations to take place, to enable some sustained economic stimulus to continue".*

### **Option 2: Town Growth Strategy**

- 4.37. *“This option, whilst concentrating most of its development within the three major towns of King’s Lynn, Downham Market and Hunstanton, where access to services and facilities is available by a variety of transport modes, may have considerable cumulative environmental impacts. While developing large greenfield allocations may be more acceptable once all brownfield capacity has been exhausted, the problem remains that development on such greenfield sites on the periphery of these settlements would have implications for the degradation of landscape quality as well as ecological impacts from the loss of any flora and fauna. Hunstanton clearly does not have sufficient infrastructure to take a major allocation of development. To continue its promotion as a tourist resort brings economic advantages. However, to expand housing development onto greenfield areas around Hunstanton would have severe impacts upon the quality of the coastal zone, particularly as some of this area is contained within the Norfolk Coast Area of Outstanding Natural Beauty. Providing greenfield housing allocations around King’s Lynn and Downham Market whilst still potentially having similar impacts on the landscape quality, as well as flora and fauna, as a focus of development, should be encouraged in terms of sustainability. This is because both towns are located on the main railway network, encouraging sustainable travel and at the same time attracting in-migration of new residents to the Borough, providing for the commuter lifestyle which in itself may generate economic growth”.*

### **Option 3: Geographic Spread**

- 4.38. *“This option would appear to be the most unsustainable; primarily as it involves large development proposals for the rural areas. This in essence would be detrimental to the special qualities and landscape setting of these villages. In many cases they may have insufficient infrastructure, services and facilities to sustain large scale development. As a consequence the need to travel would increase. This would increase associated air pollution, traffic generation and a general declines in perceived quality of life in those areas. This would result in a number of these villages becoming almost dormant settlements, losing their sense of community”.*
- 4.39. *“In addition, such an approach of geographical spread of development across the Borough would limit the development of King’s Lynn as a sub-regional centre as defined in the emerging Regional Spatial Strategy for the East of England. This could have significant impacts on the economic stability of this sub-region and the amount of investment attracted as a result”.*

### **Option 4: Do Nothing**

- 4.40. *“Whilst this may give rise to the most sustainable option environmentally, economically and socially the ‘Do Nothing’ option will lead to the stagnation of the area, particularly in terms of economic growth. Investor confidence in the area would dwindle and the Borough would enter a spiral of economic and social decline. This would have significant impacts environmentally, particularly with regard to the number of derelict sites and building potentially spoiling the character and landscape of the area”.*
- 4.41. *“In reality ‘Do Nothing’ really is not a valid option, as the Borough Council is required under the Planning and Compulsory Purchase Act 2004 to produce a Local Development Framework for the Borough of King’s Lynn and West Norfolk. Part of this process includes the allocation of land for housing, and through the Regional Spatial Strategy for the East of England, King’s Lynn and West Norfolk has to provide 11,000 dwellings over the next 20*

years. As a consequence, change is inevitable and cannot be resisted, the objective is to ensure that any new development considers the effects upon environmental, social and economic parameters, and mitigates wherever possible against any adverse impacts”.

- 4.42. *“The Issues and Options Paper rejects the ‘Do-Nothing’ option as the Regional Spatial Strategy requires the Borough to provide 11,000 dwellings over the next 20 years, and therefore development must take place. The Borough’s SA concludes that a concentrated strategy of development, with growth focussed on King’s Lynn, is the most sustainable”.*
- 4.43. The work undertaken by Land Use Consultants on the SA of the Preferred Options Core Strategy broadly supports this conclusion.

### **Policy options**

- 4.44. The remainder of the development of the Preferred Options, particularly the housing distribution options, were prepared on this basis, with changes made to the general options outlined above following consideration of the Core Strategy Preferred Options Paper by the Members of the Borough Council of King’s Lynn and West Norfolk. The most significant changes made were the exclusion of Hunstanton and the larger villages in the Borough from the key settlements to experience housing growth; a change in the threshold for affordable housing outside King’s Lynn and Downham Market to 10 dwellings from 3 dwellings; changing the focus of policies on housing in the AONB to limiting second home ownership rather than just affordable housing and the introduction of a specific policy on Second Home Ownership; the omission of Burnham Market and Terrington St. Clement from the list of key centres; and the omission of ‘reducing the need to travel’ from the sub-heading of Chapter 9, further weakening emphasis on sustainable modes of transport.
- 4.45. Throughout the Preferred Options Paper, the Rejected Options considered alongside the Preferred Option are set out. In many cases, the Preferred Option was considered to be in line with Government Guidance, and therefore there were no other reasonable options, in which case no alternatives were considered. However, in many cases, the alternative options which were considered and rejected are set out, with a brief explanation of the reasons for their rejection.
- 4.46. Where the Rejected Options were considered to have been genuine and reasonable alternatives, these were appraised alongside the Preferred Option for their sustainability implications, and a brief comparison was made between the options. However, where the Rejected Options set out were not considered to be reasonable alternatives, for example where it was contrary to Government guidance, the alternative option was not appraised. This is explained alongside the appraisal of the Preferred Option in Appendix 6.



## 5. PLAN POLICIES

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### IDENTIFYING PREFERRED OPTIONS

- 5.1. The SEA Directive requires the Environmental Report to provide “*an outline of the reasons for selecting the alternatives dealt with*” (Annex I (h))<sup>22</sup>. Although this does not explicitly require the consideration of different options, Articles 5.1 and 9.1(b) of the SEA Directive do require that reasonable alternatives are considered. The ODPM’s SA Guidance outlines methods for appraising large numbers of options during the preparation of a plan. It states that the development and appraisal of options should be an iterative process, with options being revised to take account of appraisal findings.
- 5.2. For most topic areas, the Borough Council has developed a Preferred Option which is in line with Government guidance and no alternatives were considered. In some cases, however, alternative options have been presented. These are labelled ‘Rejected Options’, and the reasons for their rejection are outlined. Where these alternative options were considered reasonable, genuine alternatives, they have been appraised along with the Preferred Option against the SA Criteria. However, in some cases it was considered that the options set out were not realistic alternatives; these have not been appraised. Where a rejected option refers to only one aspect of an option, it has been assumed, for the purposes of the appraisal, that in all other respects it is identical to the Preferred Option.

### APPRAISAL OF PREFERRED OPTIONS

- 5.3. The SEA Directive requires that in the Environmental Report “*the likely significant effects on the environment of implementing the plan or programme ... and reasonable alternatives ... are [to be] identified, described and evaluated*” (Article 5.1). The Environmental Report should include information that may “*reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme [and] its stage in the decision-making process*” (Article 5.2). This combines Tasks B3 and B4 of the ODPM’s SA Guidance, both predicting and evaluating the effects of the policies in the Core Strategy.
- 5.4. In assessing plans, SA inevitably relies on an element of subjective judgement. In predicting and assessing the sustainability effects of the King’s Lynn and West Norfolk Preferred Options Topic Papers (which comprises the Core Strategy Chapters), the analysis of the characteristics of King’s Lynn and West Norfolk, the baseline situation, plus professional experience were all referred to. The appraisal of the effects of the Core Strategy attempted to distinguish between “*significant*” and “*non-significant*” effects.
- 5.5. Annex II of the SEA Directive sets out criteria for determining the likely significance of effects. These criteria relate to:
- The characteristics of the plan or programme;

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<sup>22</sup> The SEA Directive: European Directive 2001/42/EC (EC, 2001)

- The characteristics of the effects and of the area likely to be affected.
- 5.6. The likely effects of the policies in the Core Strategy have been predicted and evaluated. As recommended in the ODPM's SA Guidance, the probability, duration, frequency and reversibility of the effects have been considered along with the magnitude and spatial extent of the effects (but only where those judgments can reasonably be made on the basis of the evidence available). Additionally, the value and vulnerability of certain areas have been considered where relevant.
- 5.7. This has required a series of judgments to be made. The appraisal has attempted to differentiate between significant effects and other more minor effects through the use of symbols (see **Table 5.1**). The dividing line in making such a decision is often quite small. Effects have been labeled "significant" where it has been judged that the effect of the preferred options on the SA objective will be of such magnitude that it will have a noticeable and measurable effect, when compared with other factors that may influence the achievement of that objective. This judgment has been made taking into account the sustainability issues and characteristics of King's Lynn and West Norfolk.

**Table 5.1: Key to Symbols used in the Appraisal**

Symbol	Meaning
++	Significant positive effect
+	Positive effect
0	Negligible effect
-	Negative effect
--	Significant negative effect
-/+	Dependent on implementation – could be a positive or negative effect
?	Uncertain
*	Evaluation of effect is dependent upon other aspects of the draft Plan.

- 5.8. It should be noted that only **significant** effects (whether positive or negative) are reported below, together with recommendations. The appraisal identified a number of other less significant effects that should also be addressed, wherever possible, in order to improve the sustainability performance of the Core Strategy Preferred Options. In addition, the nature and significance of an effect of an individual policy Preferred Option depends upon how it is implemented in conjunction with other policy Preferred Options in the Core Strategy. The SA has generally assumed that the policy safeguards within the Core Strategy will be applied to ensure that development proposals coming forward under one policy will not be permitted if they contradict policies elsewhere in the Core Strategy. In many cases, apparent negative effects of policies would be mitigated through the implementation of Objectives or Policies from other parts of the Core Strategy. In these cases, it has been assumed that these Objectives or Policies will be implemented effectively, and it was therefore not considered necessary to recommend changes to policies which are addressed elsewhere in the Core Strategy.
- 5.9. The full appraisal, including all appraisal matrices, of all the Topic Papers (i.e. chapters) making up the Core Strategy is in **Appendix 6**.

## **Achieving Sustainable Development**

### ***Significant positive effects***

- 5.10. Preferred Option 1 on Tackling Climate Change is likely to have significant positive effects on minimising waste and reducing the use of non-renewable energy resources; reducing vulnerability to the effects of climate change; and reducing emissions of greenhouse gases and other pollutants.
- 5.11. Preferred Option 2 on Renewable Energy Development is likely to have significant positive effects on reducing emissions of greenhouse gases and other pollutants; reducing the use of non-renewable resources.
- 5.12. Preferred Option 3 on Energy and Water Efficiency is likely to have significant positive effects on reducing the use of non-renewable resources, and reducing emissions of greenhouse gases and other pollutants.
- 5.13. Preferred Option 4 on the Location of Development is likely to have significant positive effects on minimising the loss of undeveloped land and reducing emissions of greenhouse gases and other pollutants.
- 5.14. Preferred Option 5 on Establishing Key Service Centres is likely to have significant positive effects on improving the quality, range and accessibility of services.

### ***Significant negative effects***

- 5.15. The Achieving Sustainable Development Preferred Option on Location of Development could potentially have significant negative effects on minimising vulnerability to climate change and flood risk by focussing development in King's Lynn, much of which is in Flood Risk Zone 3.

### ***Recommendations***

- 5.16. A number of recommendations were made to improve the sustainability performance of the Achieving Sustainable Development Preferred Options, which are summarised below:
  - It is unclear why the lower limit of 500m<sup>2</sup> and 1 residential unit has been set. Explanation into the rationale for including this lower limit should be included in the document. It is important that the social, economic and environmental effects of the LDF are all considered. Setting such targets may place limits on development and it is important that this Preferred Option is supported by research;
  - The effects of climate change will lead to hotter drier summers and droughts are likely to become much more frequent; this is a potential future sustainability issue facing King's Lynn and West Norfolk, and therefore it is important that development incorporates water efficiency measures to avoid water shortages in the longer term. This would also be likely to limit the amount of waste water produced, and therefore reduce pressures on drainage systems. This issue needs to be addressed in detail, and a specific Preferred Option addressing it would be helpful;

- Clear guidance regarding the type of renewable technology required should be set out and the need to safeguard protected sites and historic buildings from adverse impacts should be made explicit;
- Previous drafts of the Preferred Option have *required* rather than *encouraged* the incorporation of on-site renewable energy, which would have had more positive effects on reducing the use of non-renewable resources. It is recommended that the Preferred Option reverts to requiring the incorporation of on-site renewable energy resources. Previous drafts of the Preferred Option have also *required* rather than *encouraged* land use patterns which reduce the need to travel by car, which would have had more positive effects on improving access to services and facilities. It is recommended that the Preferred Option reverts to requiring land use patterns which reduce the need to travel by car;
- Previous drafts of the Preferred Option have also required the achievement of EcoHomes and BREEAM 'Excellent' rather than 'Good' standards, which would have had more positive effects on reducing the use of non-renewable resources. It is recommended that the Preferred Option refers to encouraging 'Excellent' standards ('*require*' would have an even more positive statement, but it is questionable whether the council has the power to do this when established national standards exist);
- If the Preferred Option is to require that BREEAM or EcoHomes 'Good' or 'Excellent' be achieved (which is strongly supported in sustainability terms), it should go further and specify that buildings should perform to an 'Good' or 'Excellent' standard specifically in the energy, water, transport and pollution sections of the assessment';
- Although the promotion of recycling is outlined in the Strategic Objectives, it would be useful to highlight this in the Tackling Climate Change Preferred Option';
- The Preferred Options do not deal clearly with adaptation and so could be strengthened. It is important that developers are given sufficient guidelines on ways in which to adapt to climate change. It is recommended that an SPD is produced alongside the Core Strategy which contains guidance on adapting to climate change;
- It is important that in addition to new development, existing development that is at risk of the effects of climate change should be addressed;
- Previous drafts of the Preferred Option required mitigation or compensation of unavoidable impacts, which would have had more positive effects on maintaining nature conservation interests. It is recommended that the Preferred Option revert to requiring mitigation or compensation of unavoidable impacts;
- Further research needs to be undertaken and made available alongside the Core Strategy into the implications on costs of requiring all development over 1 residential unit to incorporate renewable energy equipment;
- Further detail is required on the effects of climate change on the Borough's economy, and guidance provided on how adaptation to reduce risk should be

addressed. Guidance could be produced to provide information on reducing any adverse impacts of incorporating renewable energy technology into development;

- An SPD on Sustainable Design and Construction could be produced alongside the Core Strategy which could include guidance for developers on how to ensure that development 'looks good';
- Setting renewable energy targets well above the East of England RSS is commendable, as it demonstrates a clear vision to reduce greenhouse gas emissions as far as possible. However, the Borough Council needs to demonstrate whether these targets are achievable;
- It should be made clear that development locations should, where appropriate, include a mix of residential, employment and services development;
- The Preferred Options could explicitly outline the need to encourage walking and cycling;
- The Preferred Options should refer to the consideration of brownfield biodiversity value when developing brownfield land.

## **Housing**

### ***Significant positive effects***

- 5.17. Preferred Option 6 on Housing Distribution will be likely to have significant positive effects on minimising the loss of undeveloped land.
- 5.18. Preferred Options 7 and 8 on Affordable Housing will be likely to have significant positive effects on ensuring all groups have access to decent, appropriate and affordable housing; helping people gain access to satisfying work appropriate to their skills, potential and place of residence and improving the efficiency, competitiveness and adaptability of the local economy.
- 5.19. Preferred Option 9 on Rural Exception Sites will be likely to have significant positive effects on ensuring all groups have access to decent, appropriate and affordable housing and helping people gain access to satisfying work appropriate to their skills, potential and place of residence.
- 5.20. Preferred Option 10 on Housing in the Area of Outstanding Natural Beauty will be likely to have significant maintaining and enhancing the range and viability of characteristic habitats and species; avoiding damage to protected sites and historic buildings and maintaining and enhancing the diversity and distinctiveness of landscape and townscape character.
- 5.21. Preferred Option 11 on Second Home Ownership will be likely to have significant positive effects on ensuring all groups have access to decent, affordable and appropriate housing.
- 5.22. Preferred Option 12 on Dwelling Types will be likely to have significant positive effects on ensuring all groups have access to decent, affordable and appropriate housing.

- 5.23. Preferred Option 13 on Residential Mobile Homes is unlikely to have any significant positive effects.
- 5.24. Preferred Option 14 on New Dwellings in the Countryside will be likely to have significant positive effects on avoiding damage to designated sites and protected species, maintaining and enhancing the range and viability of characteristic habitats and species, avoiding damage to protected sites and historic buildings and maintaining and enhancing the diversity and distinctiveness of landscape and townscape character.
- 5.25. Preferred Option 15 on the Removal of Agricultural Occupancy Conditions will be unlikely to have any significant positive effects.
- 5.26. Preferred Option 16 on the Re-Use of Buildings in the Countryside for Housing will be likely to have significant positive effects on avoiding damage to protected sites and historic buildings, and maintaining and enhancing landscape and townscape character.
- 5.27. Preferred Option 17 on the Alteration or Replacement of Existing Dwellings in the Countryside will be unlikely to have any significant positive effects.
- 5.28. Preferred Option 18 on the Provision for Gypsies and Travellers will be unlikely to have any significant positive effects.

#### ***Significant negative effects***

- 5.29. The Housing Preferred Options are not expected to have any significant negative effects. This may appear surprising given the scale of development proposed, However, significant adverse effects are likely to be prevented because by far the majority of development will take place on previously developed land, and because there are a number of policy safeguards elsewhere in the Core Strategy that aim to protect and enhance the environment.
- 5.30. One area of concern, however, is that despite the high levels of proposed housing, and the affordable housing policies, the Core Strategy will not be able to deliver all the affordable housing identified as being required in the 2002 Housing Needs Survey.

#### ***Recommendations***

- 5.31. A number of recommendations were made to improve the sustainability performance of the Housing Preferred Options, which are summarised below:
- The Preferred Options should clarify what the balance of housing (and other) development will be between the towns and key service centres (this, in itself, will give rise the different effects depending on the balance proposed). This should be reflected in the Core Strategy Preferred Options Key Diagram which at the moment is inadequate in providing a clear visual interpretation of the scale and location of different types of development across the Borough;
  - There is no guidance given on the density of housing development in different locations. This is important in order to ensure that the most efficient use of land is achieved and that higher densities within the urban areas can help to create the critical mass to support local services and public transport provision. The proposed density guidelines in draft PPS3 should be used to inform the preferred approach for the Borough;

- The Preferred Options should consider the appropriateness and vulnerability of directing development to areas at risk of flooding, such as King's Lynn;
- It is recommended that it be considered whether a small amount of housing could be allocated to Hunstanton to complement the growth in services and employment which Preferred Options 19 and 21 aim for and to contribute towards the regeneration of the town, and potentially to support the role of the larger villages (key service centres);
- The Preferred Options for affordable housing could be improved by including reference to minimising waste production in the construction of housing, for example by using secondary and recycled aggregates, and aiming to reduce waste production by communities and increase recycling;
- The provision of affordable housing should be integrated with a range of community facilities and services, including open space;
- The Preferred Options could consider whether larger developments (e.g. more than x number of dwellings) could incorporate a 40% affordable housing target in order to make greater inroads into the affordable housing shortfall that will exist under the Core Strategy. Additionally, the Preferred Option could consider whether it might be appropriate to include 'Lifetime Homes' standards in the provision of affordable housing;
- In order for the Borough to meet its affordable housing need, over 75% of its housing allocation of 12,000 dwellings would have to be affordable housing. The benefits of meeting affordable housing need would have to be assessed against the deliverability of this;
- The Previous Preferred Option required the inclusion of 30% affordable housing in all developments over 3 dwellings outside the main towns in the Borough. This might have led to an increase in affordable housing provision, and the benefits of this should be considered against the potential decrease in overall house-building levels due to the increased burdens being placed on developers. The 10 dwelling threshold may be easier to implement, but could lead to lost opportunities for smaller scale developments that could have included affordable housing, which could in particular affect smaller developments;
- The Preferred Options should clarify the locational guidance with respect to residential mobile homes and flood risk;
- Referring to locating Gypsy and Traveller sites away from designated areas and protected species, to minimise effects on biodiversity, and clarifying whether they will be permitted to be located within the AONB;
- Referring to ensuring that Gypsy and Traveller sites are served with adequate waste management facilities;
- The Preferred Options could consider lowering the threshold for affordable housing in the AONB to less than 10 dwellings. The policy also needs to give guidance on what housing will be allowed in settlements with less than 25% second homes. Currently, the implication is that no restrictions apply which

could damage the AONB and lead to greater second home ownership overall. Also careful consideration needs to be given to ensure that the policy is implementable.

## **Economic Regeneration**

### ***Significant positive effects***

- 5.32. Preferred Option 19 on the Location of Economic Development, Retail and Tourism is likely to have significant positive effects on helping people gain access to work.
- 5.33. Preferred Option 20 on the Growth of Towns and Gaywood District Centre is likely to have significant positive effects on minimising the loss of undeveloped land, reducing emissions of greenhouse gases compared with alternatives and other pollutants, improving the quality, accessibility of services and facilities and helping people gain access to satisfying work appropriate to their skills, potential and place of residence.
- 5.34. Preferred Option 21 on Employment Sites and Premises will be likely to have significant positive effects on minimising the loss of undeveloped land, helping people gain access to work and improving the efficiency, competitiveness and adaptability of the local economy.
- 5.35. Preferred Option 22 on the Location of Office Development should have significant positive effects on helping people gain access to work appropriate to their place of residence.
- 5.36. Preferred Option 23 on the Location of Industrial and Warehouse Development is unlikely to have any significant positive effects.
- 5.37. Preferred Option 24 on the Redevelopment of Office, Industrial and Warehouse Sites will be likely to have significant positive effects on improving the local economy.
- 5.38. Preferred Option 25 on Promoting Tourism will be likely to have significant positive effects on avoiding damage to protected sites and historic buildings; maintaining and enhancing the diversity and distinctiveness of landscape and townscape character; helping people gain access to satisfying work appropriate to their skills, potential and place of residence and improving the efficiency, competitiveness and adaptability of the local economy.
- 5.39. Preferred Option 26 on Caravans, Cabins and Camping Sites will be likely to have significant positive effects on maintaining and enhancing the diversity and distinctiveness of landscape and townscape character.
- 5.40. The Preferred Option on Key Service Centres is likely to have significant positive effects on improving the quality, range and accessibility of services and facilities.
- 5.41. Preferred Option 27 on the Retention of Village Services will be likely to have significant positive effects on improving the range and accessibility of services and facilities.
- 5.42. Preferred Option 28 on Farm Diversification is unlikely to have any significant positive effects.



- 5.43. Preferred Option 29 on the Re-Use and Re-Development of Rural Buildings for Employment will be likely to have significant positive effects on avoiding damage to protected sites and historic buildings and maintaining and enhancing landscape and townscape character.

***Significant negative effects***

- 5.44. The Economic Regeneration Preferred Option on Identifying Key Service Centres could have significant negative effects on minimising the loss of productive agricultural land, avoiding damage to designated wildlife sites and protected landscape areas.

***Recommendations***

- 5.45. A number of recommendations were made to improve the sustainability performance of the Economic Regeneration Preferred Options, which are summarised below:
- Although the Preferred Options are not expected to result in damage to known protected sites and historic buildings, there is potential for unknown archaeology to be lost as a result of development. There is a need to mitigate these losses by carrying out archaeological watching briefs when carrying out development. This should be highlighted in the Core Strategy;
  - The Core Strategy should ensure that appropriate funding is invested in sustainable transport alongside economic development;
  - The Preferred Option should consider the potential for adverse impacts on the integrity of the historic town centres and opportunities for heritage led employment development;
  - The need to target areas most in need of employment development should be made explicit in the Core Strategy;
  - The balance between affordable housing needs and employment needs should be carefully considered in the Core Strategy to ensure that all needs of the Borough are met and to reduce the need to travel and commuting. Mixed uses may be appropriate in certain locations and this could be made clearer in the text;
  - In addition to protecting designated sites and protected species, the Core Strategy should address the need to protect brownfield biodiversity as far as possible when carrying out any development in the Borough;
  - The Preferred Options could encourage office development where it is accessible by pedestrian and cycling access, not just public transport. They should not allow for out of centre development that is not accessible by foot, cycling and public transport. Large scale office developments should be accompanied by a Green Travel Plan. If such developments are likely to lead to a significant increase in vehicular traffic they should not be permitted;
  - The wording of the Preferred Option could be changed to ensure that the character of the Borough is not adversely affected by the development of industrial units;
  - The Preferred Option should encourage the location of industrial and warehouse development in locations that are accessible or have the potential to be

accessible by sustainable modes of transport. Developments that are likely to significantly increase traffic should not be permitted;

- The Preferred Options should aim specifically to develop year round tourism which would create opportunities for satisfying employment.

## **Transport and Travel**

### ***Significant positive effects***

- 5.46. Preferred Option 30 on Improving Transport and Travel is likely to have significant positive effects on reducing emissions of greenhouse gases and other pollutants, protecting human health and improving the range and accessibility of services and facilities.
- 5.47. Preferred Option 31 on Improving Accessibility is likely to have significant positive effects on improving the quality, range and accessibility of services and facilities.
- 5.48. Preferred Option 32 on Safeguarding Transport Routes should have significant positive effects on improving the accessibility of services and facilities.
- 5.49. Preferred Option 33 on Travel Plans and Standards is unlikely to have any significant positive effects.

### ***Significant negative effects***

- 5.50. The Transport and Travel Preferred Options could potentially have significant negative effects on emissions of greenhouse gases and other pollutants, and on maintaining and enhancing human health, if, in recognising the “*essential role of the private car*”, too little emphasis is put on developing sustainable modes of transport alternative to the car.
- 5.51. In addition, the scale of development proposed is likely despite the Preferred Options policies, to lead to an overall increase in traffic in the Borough (and hence greenhouse gas emissions).

### ***Recommendations***

- 5.52. Recommendations that would improve the sustainability performance of the Transport and Travel Preferred Options include:
  - The Preferred Options could be improved by placing further emphasis on reducing vehicle travel and switching to non-car modes of transport and by focusing the development of transport infrastructure more heavily on public transport. This would reduce emissions of greenhouse gases and pollutants, and also make the transport system more equitable, by making it available to those without cars;
  - Overall, the Preferred Options include various issues which require clarification, including:
    - What is meant by a ‘*safe and good transport system*’?
    - What are the ‘*particular needs*’ of rural residents?

- What does ‘recognising the essential role of the private car’ mean?
  - Whether the former railway trackbeds and routes, discussed in the Preferred Option on Safeguarding Transport Routes, will be safeguarded for future use for public transport or for use by private cars.
  - It should be considered whether these Preferred Options will really make a difference to the use of the car, or whether there is more, perhaps quite radical such as congestion of road-user charging, which could be done to encourage a step-change in behaviour. For example, Preferred Option 31 refers to ‘where a choice of means of transport can be provided’. In reality, people will choose to use the car unless alternative modes are not only available but also more attractive to use.
- 5.53. In addition, the Core Strategy refers in the text (but not policies) to Park-and-Ride which could encourage increases in car travel outside King’s Lynn, and a possible marina, which could have significant environmental implications as well as economic benefits. As neither of these are mentioned in policies, they have not been appraised.
- 5.54. Previous drafts of the Preferred Option explicitly aimed to reduce the need to travel, which would have had more positive impacts on reducing the use of non-renewable resources, and emissions of greenhouse gases and other pollutants, and on improving accessibility. It is recommended that the Preferred Option revert to aiming to reduce the need to travel, and ideally, the Borough should be aiming to reduce travel in absolute terms, not just the need.
- 5.55. The Preferred Option could be improved by placing a heavier emphasis on reducing vehicle travel and switching to non-car modes of transport, and by focusing the development of transport infrastructure more heavily on public transport. This would reduce emissions of greenhouse gases and pollutants, and also make the transport system more equitable, by making it available to those without cars.

## **Sports, Recreation and Open Space**

### ***Significant positive effects***

- 5.56. Neither Preferred Options 34 nor 35 are expected to have significant positive effects. However, the Preferred Options for Sports, Recreation and Open Space could potentially have positive effects on making the Borough of King’s Lynn and West Norfolk more attractive, maintaining and enhancing human health, and maintaining levels of habitats and species.

### ***Significant negative effects***

- 5.57. No significant negative effects are identified. However, the levels of open space requirements in new developments are low compared to targets set by English Nature and the National Playing Fields Association, which could potentially have negative effects on health, by reducing opportunities for sport and recreation, and on access to open space.

### ***Recommendations***

- 5.58. Recommendations to improve the Sustainability Performance of the Sports, Recreation and Open Space Preferred Options include:

- Clarifying why the ratio of open space provision per person is set at a low level, and aiming to not only maintain provision of open space at current levels, but to provide higher levels of open space, sport and recreation facilities, and to maintain a high design quality of open space in new and existing development;
  - Encouraging nature conservation objectives to be incorporated into the management of all open space, and referring to the fact that open space could be used as a component of flood storage and flood flow management.
- 5.59. The background information from the Borough's assessment of sport, recreation and open space issues included in the paper is useful. However, background information on children's play facilities, allotments, churchyards, cemeteries, nature reserves, outdoor and indoor sports and recreation facilities and community/town/village halls does not appear to have been used to develop policy. Also, for other aspects where current provision is adequate (e.g. allotments, churchyards, cemeteries) it could be argued that the policy approach should be to maintain and safeguard the current resource. It is recommended that either preferred options are developed based on this information, or that the findings of the assessment that are not relevant to policy are reported elsewhere.

## **Environmental Protection**

### ***Significant positive effects***

- 5.60. Preferred Option 36 on Water, Air and Soil Resources are likely to have significant positive effects on minimising the irreversible loss of undeveloped land and productive agricultural holdings and limiting water consumption to sustainable levels.
- 5.61. Preferred Option 37 on Flood Risk will be likely to have significant positive effects on reducing the vulnerability of the Borough to climate change and maintaining human health.
- 5.62. Preferred Option 38 on Sewage and Drainage Systems will be likely to have significant positive effects on avoiding damage to habitats and species, including designated sites and protected species and reducing emissions of greenhouse gases and other pollutants.
- 5.63. Preferred Option 39 on Noise, Dust, Dirt, Odour and Vibration, is likely to have significant positive effects on avoiding damage to designated wildlife and heritage sites, protected species and historic buildings.
- 5.64. Preferred Option 40 on Waste and Recycling is likely to have significant positive effects on avoiding damage to designated wildlife sites and protected species.
- 5.65. Preferred Option 41 on Pollution are likely to have significant positive effects on a number of SA Objectives, including minimising the irreversible loss of undeveloped land and productive agricultural holdings; avoiding damage to designated sites and protected species; avoiding damage to protected sites and historic buildings; reducing emissions of greenhouse gases and other pollutants and maintaining and enhance human health.
- 5.66. Preferred Option 42 on Geology and Land Stability is likely to have significant positive effects on minimising the irreversible loss of undeveloped land and productive

agricultural holdings; avoiding damage to designated sites and protected species and limiting or reduce vulnerability to the effects of climate change.

### **Significant negative effects**

- 5.67. The Environmental Protection Preferred Options are not expected to have any significant negative effects, although it is possible that some forms of development, that would otherwise bring social and economic benefits to the Borough, may be foregone as a result of implementation of these Preferred Options.

### **Recommendations**

- 5.68. Recommendations on the Environmental Protection Preferred Options to strengthen their sustainability performance include:

- Aiming to increase air quality not only in Air Quality Management Areas, but across the Borough as a whole;
- Making reference to encouraging high quality design of waste management facilities, suitable to their location, which would reduce any potential adverse effects on landscape or townscape character including conservation areas;
- The Noise, Dust, Dirt, Odour and Vibration Preferred Option. What is meant by 'sufficient' noise, dust, dirt or odour generation should be clarified;
- Various issues have not been addressed in the Waste and Recycling Preferred Option which would be expected. It is suggested that the following issues should be discussed in the preferred options:
  - Specifying that guidance on sustainable waste management should include information and guidance on waste minimisation, re-use and recycling;
  - Potential locations for waste management facilities;
  - Suggested criteria for siting waste management facilities (e.g. co-locating facilities with compatible land uses, including a 250m buffer between facilities and sensitive receptors);
  - Some indication of waste allocations between facilities;
  - Encouragement of a reduction of construction and demolition waste in new development;
- The Geology and Land Stability Preferred Option ought to recognise the need to allow natural coastal processes, particularly in light of climate change, to take their course wherever possible. The Geology and Land Stability Preferred Option would also be improved by clarifying what is meant by promoting '*the incorporation of geological features into the design of development*'. It should also be checked whether there are any internationally designated sites of geological importance in the borough, and whether proposals for stabilisation works would always require an environmental assessment under the EIA regulations;
- Whilst considering the location of development against flood risk criteria, it will be important to take other issues into account, including the use of undeveloped

land, designated sites and protected species, protected sites and historic buildings, landscape and townscape. The sustainability advantages and disadvantages of developing brownfield land need to be considered in light of flood risk considerations, compared to other alternatives;

- The Preferred Options on Flood Risk should specifically take into account changes in flood risk due to climate change (e.g. increased fluvial flooding, sea level rise, storm surges etc). Additionally, it should be ensured that development now should not rule out adaptation options for dealing with flood risk in the future.

## **Coastal Planning**

### ***Significant positive effects***

- 5.69. Preferred Option 43 on Coastal Planning is expected to result in significant positive effects on limiting or reducing vulnerability to the effects of climate change. This is because the preferred options focus on ensuring that new development is not at risk from flooding, erosion or land instability, which all have the potential to be exacerbated by climate change.

### ***Significant negative effects***

- 5.70. The Coastal Planning Preferred Options are not likely to result in any significant negative effects, although it may preclude some development coming forward in locations that may have otherwise achieved economic and social objectives.

### ***Recommendations***

- 5.71. Recommendations which could improve the sustainability performance of the Coastal Planning Preferred Options include:
- Although the Preferred Option is not expected to result in damage to known protected sites and historic buildings, there is potential for archaeology to be lost as a result of coastal change. There is a need to mitigate these losses by identifying potential interest at risk, and defining an appropriate mitigation strategy;
  - The Preferred Option also needs to consider whether there are existing developments that could be vulnerable to future changes in the coast, which may need to be planned for now with respect to the mitigation/relocation strategy;
  - The Preferred Option should ensure that the affordable housing needs of those living in coastal areas are met alongside ensuring that development is not at risk of flooding, erosion or land instability;
  - The Options should clarify whether the Rejected Option would allow development in the Coastal Zone;
  - The Coastal Planning Preferred Option should consider and make reference to the vulnerability of transport infrastructure and access.

## **Countryside and Landscape Protection**

### ***Significant positive effects***

- 5.72. Preferred Option 44 on Countryside Protection and Development in the Countryside is likely to have significant positive effects on minimising the loss of undeveloped land; avoiding damage to biodiversity, including designated sites and protected species; and avoiding damage to landscape and townscape including designated sites and historic buildings.
- 5.73. Preferred Option 45 on Protecting and Enhancing the Landscape will be likely to have significant positive impacts on avoiding damage to protected sites and historic buildings, maintaining landscape and townscape diversity and character and creating spaces, places and buildings that work well, wear well and look good.

### ***Significant negative effects***

- 5.74. By limiting development in rural areas, the Countryside and Landscape Protection Preferred Option could decrease access to services and facilities for rural residents. As the isolated nature of the rural parts of the Borough is a key issue in King's Lynn and West Norfolk, this could lead to the Preferred Option having significant negative effects on redressing inequalities related to location. Additionally, the Preferred Options could rule out some development on landscape grounds which would otherwise bring social and economic benefits.

### ***Recommendations***

- 5.75. Recommendations which could improve the sustainability performance of the Countryside and Landscape Preferred Options include:
- Promoting public access to Protected Areas, especially the AONB, where this is compatible with their special interests;
  - The Countryside and Landscape Protection Preferred Options should distinguish more clearly between landscape quality (reflected in designations such as the Area of Outstanding Natural Beauty and the Heritage Coast), and landscape character; and should attempt to preserve and enhance both of these. The Preferred Options could be improved by taking a more positive approach to enhancing the landscape and townscape as well as protecting the quality and character from inappropriate development. This could be achieved by making more reference to requiring a high quality of design;
  - The Preferred Options should also consider the impacts of climate change on the landscape, and the effects of both noise and light pollution, and how the Core Strategy could address the impacts identified.

## **Biodiversity**

### ***Significant positive effects***

- 5.76. Preferred Option 46 on Enhancing, Protecting and Creating Areas of Biodiversity and Nature Conservation is expected to have significant positive effects on maintaining

and enhancing the range and viability of characteristic habitats and species and on avoiding damage to designated sites and protected species.

- 5.77. Preferred Option 47 on Special Sites is expected to have significant positive effects on avoiding damage to designated sites and protected species.
- 5.78. Preferred Option 48 on Habitats and Species is expected to have significant positive effects on maintaining and enhancing the range and viability of characteristic habitats and species.
- 5.79. Preferred Option 49 on Development and Biodiversity is likely to have significant positive effects on avoiding damage to designated sites and protected species.

### ***Significant negative effects***

- 5.80. The Biodiversity Preferred Options are not expected to have any significant negative effects, although they may preclude some development coming forward that would otherwise meet social and economic objectives.

### ***Recommendations***

- 5.81. A number of recommendations are made for the improvement of the Biodiversity Preferred Options in sustainability terms, which are summarised below:
  - The Biodiversity Preferred Options could be stronger on encouraging the incorporation of biodiversity into new development, improving access to areas of biodiversity value whilst ensuring that this does not have adverse impacts on their integrity and ensuring that, where possible, measures are put in place to enable habitats and biodiversity to adapt to the impacts of climate change;
  - In addition to addressing the need to protect habitats and species, the Preferred Options could encourage the creation of new habitats alongside development. This would have positive effects on the appearance of the Borough, whilst also having positive effects on biodiversity;
  - Accessibility to characteristic habitats should be encouraged, where this will not have negative impacts on the integrity of such habitats. Where it would not affect the integrity of designated sites, the Preferred Options should also encourage the opening up of access to designated sites;
  - The Preferred Options could highlight the need to ensure that the effects of climate change on biodiversity are considered;
  - The Preferred Options should encourage the provision of publicly accessible open space in development which has biodiversity value, especially in areas that are currently in deficit;
  - The Biodiversity Preferred Options could refer to the need to protect biodiversity on agricultural land;
  - The need to protect habitats and species from the effects of climate change such as flooding and drought should be addressed. It is important that these effects are considered now to avoid adverse impacts in the future.



## **Conservation of Built Environment**

### ***Significant positive effects***

- 5.82. Preferred Option 50 on the Conservation of the Built Environment is likely to have significant positive effects on avoiding damage to protected sites and historic buildings, maintaining and enhancing the diversity of townscape character and creating spaces, places and buildings which look good.

### ***Significant negative effects***

- 5.83. The Conservation of the Built Environment Preferred Option is not likely to have any significant negative effects.

### ***Recommendations***

- 5.84. The Conservation of Built Environment Preferred Option could be improved in sustainability terms by implementing the following recommendation:
- Aiming to protect and enhance both landscape and townscape character through high quality built development across the whole Borough, without being restricted to conservation areas.

## **General Considerations**

### ***Significant positive effects***

- 5.85. Preferred Option 51 on Advertisements and Areas of Special Control will be likely to have significant positive effects on avoiding damage to protected sites and historic buildings, and maintaining and enhancing landscape and townscape character.
- 5.86. Preferred Option 52 on Public Amenity is likely to have significant positive effects on avoiding damage to protected sites and historic buildings, maintaining and enhancing landscape and townscape and creating spaces, places and buildings that work well, wear well and look good.
- 5.87. Preferred Option 53 on Design is likely to have significant positive effects on creating spaces, places and buildings which work well, wear well and look good.
- 5.88. Preferred Option 54 on Securing Planning Obligations is unlikely to have any significant positive effects.
- 5.89. Preferred Option 55 on Telecommunications is unlikely to have any significant positive effects.

### ***Significant negative effects***

- 5.90. The General Considerations Preferred Options are unlikely to have any significant negative effects.

### ***Recommendations***

- 5.91. The General Considerations Preferred Options could be improved by:

- Requiring all advertisements to be of high design quality, rather than just those in designated areas, which would have further positive effects on enhancing the attractiveness of places, spaces and buildings in the Borough;
- Aiming to protect and enhance both landscape and townscape character through high quality built development across the whole Borough, without being restricted to conservation areas;
- Stating explicitly that the landscape, townscape, protected sites and historic buildings of the Borough will be recognised as part of what makes the Borough special and distinct, and aiming to protect the high amenity value of the historic and cultural heritage of the Borough.

## **CUMULATIVE EFFECTS**

5.92. The SEA Directive requires that the assessment of effects should include “*secondary, cumulative, synergistic, short, medium and long-term permanent and temporary effects*” (SEA Directive Annex I (f, footnote 1)). The Core Strategy sets out the Spatial Objectives, Visions and Policy that will be applied to development in King’s Lynn and West Norfolk over the plan period until 2021. In many instances it is difficult to be precise about when and in what form the effects will arise, and how one effect might relate to another.

5.93. However, it is possible to draw some broad conclusions about the nature of the effects that the SA has identified:

- Most of the effects will be permanent, in that the Core Strategy aims to deliver development that will last the test of time. There will inevitably be some temporary and short or medium term effects, particularly during construction, which will vary depending on the nature, scale and form of development, and the specific conditions that will apply during the construction process. Typical effects during construction will include amenity impacts such as noise, traffic generation, dust (air quality), and visual impact. There could also possibly be effects on soils and water resources/quality, although it would normally be possible to mitigate the most significant effects arising.
- The effects which have been identified in the appraisal of the Spatial Objectives and individual policies, both positive and negative, are likely to increase over time, as the policies in the Core Strategy are rolled out and implemented. For example, the delivery of housing is phased over the period. This means that increasing amounts of affordable housing would become available over the same period. Any changes to settlement character, including impacts such as on landscape and townscape, will increase as development is delivered, depending upon the quality of the development delivered.

### ***Positive cumulative effects***

5.94. A number of the Spatial Principles and Preferred Options policies should combine to give positive effects with respect to the sustainability objectives, thereby increasing the likelihood of positive outcomes arising:

- The maintenance and enhancement of landscape and townscape quality;

- The protection and enhancement of biodiversity and important natural resources;
- The preservation and enhancement of the Borough's historic environment;
- The location of development in the most sustainable locations;
- Providing closer links between where people live and where they work.

***Other cumulative effects***

5.95. No sustainability objectives appeared to be significantly affected by the combination of Spatial Objectives and Policies in a solely negative way. However, there are a number of issues where different policies have the potential to pull in different directions, or where there is some uncertainty over how the cumulative effects might emerge:

- Encouraging the prudent use of natural resources given the scale of development proposed;
- Minimising the Borough's contribution to climate change;
- Improving access to a range of services and facilities in the rural areas of the Borough;
- Increases in flood risk due, particularly in King's Lynn, to the potential increases in impermeable surfaces arising as a result of development;
- Increases in traffic (including greenhouse gas emissions) from the construction of housing, employment, services and retail development, despite the aim to reduce the need to travel;
- Changes in the character of the main settlements, especially King's Lynn, from the scale of development proposed (which could be either positive or negative depending on implementation);
- Greater pressure (often indirect) on the landscape and biodiversity resource not only from development, but also from increased population (e.g. disturbances by people and pets to habitats and species).

## 6. IMPLEMENTATION AND MONITORING

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### LINKS TO OTHER TIERS OF PLANS AND PROGRAMMES AND THE PROJECT LEVEL

- 6.1. The Core Strategy represents just one component of the development plan for King's Lynn and West Norfolk. Other components of the development plan include the East of England Plan (RSS14), and the remaining Development Plan Documents that relate to the Borough that have yet to be prepared.
- 6.2. The actual effects of the Core Strategy will be highly dependent upon the actual delivery of development projects on the ground – both in terms of where they are located, and how the development is built and managed. As a result, although the effects in principle of the Core Strategy Preferred Options have been described in this SA Report, it will be the Site Specific Allocations DPD and the Area Action Plans DPD that will set out in more detail the criteria for specific developments.
- 6.3. As a result, it will be essential that the findings of this SA Report are taken into account when the Council prepares the other DPDs, and that these too are subject to thorough appraisal consistent with that used for the Core Strategy.
- 6.4. In addition, there will be other delivery documents that are relevant, such as the minerals and waste DPDs, and local transport plans prepared by Norfolk County. It is recommended that the findings of this SA also help to inform the preparation and review of these documents.

### PROPOSALS FOR MONITORING

- 6.5. The SEA Directive requires that “*member states shall monitor the significant environmental effects of the implementation of plans or programmes... in order, inter alia, to identify at an early stage, unforeseen adverse effects, and be able to undertake appropriate remedial action*” (Article 10.1) and that the environmental report should provide information on “*a description of the measures envisaged concerning monitoring*” (Annex I (i)). The ODPM's SA Guidance states that monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making. This represents Task E1 in the ODPM's SA Guidance.
- 6.6. The monitoring of the significant sustainability effects of a plan can be undertaken at authority level, and one monitoring report may be written for several plans. It is recommended that the Borough Council of King's Lynn and West Norfolk include the requirements for monitoring the significant sustainability effects of the Core Strategy identified in this SA Report in their overall monitoring strategy.
- 6.7. **Table 6.1** sets out proposed measures for monitoring the sustainability effects of implementing the preferred options for the Core Strategy DPD. The monitoring measures proposed are linked to the SA process, including the objectives, targets and indicators developed for the SA Framework, the baseline information and key sustainability issues, the likely significant effects expected, and the mitigation measures proposed. The ODPM's draft SA Guidance states, however, that it is not necessary to monitor everything. Instead, monitoring should be focussed on the

significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused) and the significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken. The monitoring measures proposed focus on these.

- 6.8. The policies and objectives of the Core Strategy will be delivered in the context of the Local Development Framework as a whole, and the wider policy framework which sits alongside the planning system. This means that implementation of the Core Strategy will be influenced by how it is reflected in the other Local Development Documents forming part of the Local Development Framework, and by the successful implementation of these. For this reason, monitoring the sustainability effects of implementing the Core Strategy DPD should be conducted as part of an overall approach to monitoring the sustainability effects of implementing the DPDs and Supplementary Planning Documents that make up the Local Development Framework. This approach is consistent with the ODPM's Good Practice Guidance on monitoring Local Development Frameworks<sup>23</sup> which requires information on the sustainability effects of implementing DPDs and Supplementary Planning Documents making up the Local Development Framework to be included in the Annual Monitoring report prepared for monitoring the overall performance of the Local Development Framework.
- 6.9. The indicators proposed in Table 6.1 are included as suggestions. Similar indicators already collected for other purposes (e.g. monitoring the existing King's Lynn and West Norfolk Local Plan, Best Value Indicators etc) may provide suitable alternatives. Wherever possible, existing monitoring arrangements, including information collected by outside bodies, should be used as a source of indicators. However, it is recommended that the information collected should provide a basis for understanding the sustainability effects of implementing the Core Strategy in the context of the issues identified for monitoring in column 1 of Table 6.1 and the information required in column 2.
- 6.10. According to the ODPM's Good Practice Guide to Monitoring Local Development Frameworks, indicators used in monitoring the sustainability effects of implementing plans should be focussed on outcomes (ends) rather than outputs (the means) - for example, monitoring air quality rather than emissions. However, where it is not possible to identify a suitable outcome indicator, output indicators can be used. The indicators listed in Table 6.1 include both outcome and output indicators. Where possible, in the future Borough Council is encouraged to identify suitable outcome indicators, in place of the output indicators included, for monitoring the significant effects of the Core Strategy.

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<sup>23</sup> *Local Development Framework Monitoring: A Good Practice Guide*. The Office of the Deputy Prime Minister 2004.

6.11. **Table 6.1 Monitoring recommendations (to be reviewed and linked to significant effects identified)**

What needs to be monitored?	What sort of information is required?	Suggested indicators	Where can the information be obtained?
Loss of undeveloped land and productive agricultural holdings	Amount of new development on greenfield sites	Percentage / area of housing/employment allocations on greenfield land	National Land Use Database
Quality of built development / effects on landscape and townscape quality	Impact of development on settlement character within settlement Development Limits	Percentage of Grade I and II buildings at risk on the English Heritage listed buildings register  Countryside Character Areas / Local Distinctiveness	English Heritage
Affordable housing	Provision of affordable housing	Proportion of new development that is affordable housing  Numbers of affordable dwellings built  Affordable housing need	Annual Monitoring Report  Housing needs survey
Flood risk	Levels and areas of flood risk in the Borough  Flood defences  Amount of development in high flood risk zones	Strategic Flood Risk Assessment zones  Proportion of new development in high flood risk zones  Recorded flood events	Environment Agency
Effects on climate change	Minimising the use of natural resources	CO <sub>2</sub> emissions by end user / Regional SDF proposed indicator for emissions of greenhouse gases)  Energy produced from renewables	Defra/NETCEN
Traffic growth	Length and volume of journeys by mode	Total volume of road traffic  Proportion of journeys made by sustainable modes	Highways Authority  Public Transport Service Providers
Effects on the economy	Availability of accessible employment sites	Regional SDF proposed indicator for employment  Travel to work data	Annual Monitoring Report

<b>What needs to be monitored?</b>	<b>What sort of information is required?</b>	<b>Suggested indicators</b>	<b>Where can the information be obtained?</b>
Accessibility of services	Access to services for all, including in rural areas	Proposed Regional SDF indicator for access to services	Office of National Statistics
Quality of the natural environment and biodiversity value	Biodiversity levels  Condition of the natural environment	Indicators set out in Biodiversity Action Plan  Condition of SSSIs and other designated sites  Damage/loss to Natura 2000 sites (Habitats Directive)	Biodiversity Action Plan Working Group  English Nature

## 7. CONCLUSIONS

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- 7.1. The appraisal of the Preferred Options of the Core Strategy identifies few significant negative effects. This reflects the fact that the Preferred Options generally perform satisfactorily against the SA Objectives. However, a number of recommendations have been made, which demonstrate the lengths that could be gone to improve the sustainability performance of the Preferred Options.
- 7.2. As stated in Section 5 of this SA Report, this judgement is based on an appraisal of each individual policy on its own merits. In practice, when implementing the Core Strategy, it is unlikely that it will be possible to deliver development that meets all of the policy objectives set out in the Preferred Options.
- 7.3. For example, a number of aspects of the Preferred Options, for example with respect to landscape protection, development in the countryside, and nature conservation, may preclude development coming forward that would otherwise help to meet social and economic objectives.
- 7.4. Similarly, the priority for development may be such that it will not be possible to deliver this development without compromising some of the Preferred Options that are concerned with the environment.
- 7.5. The potential tensions are become evident under the requirement under the Regional Spatial Strategy to develop 12,000 dwellings in the Borough by 2021, as well as some share of the 9,900 jobs required in Norfolk outside the Norwich and the Great Yarmouth sub-regions. The number of dwellings as at 2001 was approximately 60,000, which suggests that the total number of dwellings will increase by around 20% over a 20 year period.
- 7.6. The success of the Core Strategy will be dependent upon delivering jobs as well as home, and in ensuring that those most in need benefit.
- 7.7. This scale of development is likely to have large effects on its deliverability in the Borough. The cumulative effects of this large scale development, and the interactions of policies from various parts of the plan, may also lead to significant negative effects which have not been identified in the appraisal. Areas where significant effects could arise include the following:
  - As the Preferred Option for housing distribution focuses development on King's Lynn, the high flood risk in many parts of King's Lynn is a particularly important issue. Although focussing development in the major urban area of the Borough has economic and social sustainability benefits in terms of making King's Lynn a sub-regional centre, and environmental benefits through reducing the need to travel, these need to be balanced against the disadvantages of locating large amounts of development where it is at risk of tidal flooding. Other locations are also at risk of flooding and coastal change (e.g. around Hunstanton). The ability of the Core Strategy to deliver development that is in accordance with the flood protection policies may therefore be a challenge.
  - There is currently a high dependence upon the private car in King's Lynn and West Norfolk, and the scale and pace of development proposed in the Core



Strategy suggest that traffic is likely to increase, despite Preferred Options that aim to reduce car dependency. The Core Strategy therefore needs to be critically challenged to determine whether it is doing enough to really cause a step-change in the use of non-car modes (including commuting outside of the Borough).

- Similarly, and linked to traffic, is the issue of carbon emissions in the Borough, which are above the national average. The Core Strategy aims to deal with this issue through a number of policy Preferred Options, which are ambitious in their aims, and are commended, although their deliverability will be a challenge which must be borne in mind.
- Although the Sustainable Development Preferred Options aim to encourage recycling of waste, the large scale of development means that waste production in the Borough is nevertheless likely to increase. This will have to be considered when planning for waste management.

7.8. In response to the above issues, there is a need to carry out further work to:

- Establish the environmental limits to development, and the standards required of development (for example with respect to energy and water efficiency, trip generation, contribution to biodiversity targets) in order to remain within these limits.
- Determine how demands on infrastructure and natural resources can be further reduced through much more efficient use of materials and resources in order to avoid their use in the first place and avoid the need for investment in new infrastructure.
- Provide a strong and clear mechanism for mitigation and compensation, so that when adverse effects are likely to arise that cannot be avoided, there is no net loss of the benefits foregone (whether these are social, economic or environmental).
- Ensure that the 'precautionary principle' is applied when the effects of a proposal are uncertain (i.e. not permitting development until the likely effects can be established).

7.9. It is important that these issues are explored further through the remainder of the LDF preparation process and in particular the Site Specific Allocation DPD. King's Lynn and West Norfolk is particularly vulnerable to the impacts of climate change, which is largely the product of unsustainable human actions. The Borough should therefore be aiming to take a lead on adopting a highly sustainable approach to development and activity that will leave a positive legacy to pass on to future generations.



## **APPENDIX I**

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### **COMMENTS ON THE SCOPING REPORT**

**Please refer to the CD contained within the Preferred Options Paper or visit  
[www.west-norfolk.gov.uk](http://www.west-norfolk.gov.uk)**



## **APPENDIX 2**

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### **REVIEW OF RELEVANT PLANS AND PROGRAMMES**

**Please refer to the CD contained within the Preferred Options Paper or visit**

**[www.west-norfolk.gov.uk](http://www.west-norfolk.gov.uk)**



## **APPENDIX 3**

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### **BASELINE INFORMATION**

**Please refer to the CD contained within the Preferred Options Paper or visit**

**[www.west-norfolk.gov.uk](http://www.west-norfolk.gov.uk)**

## **APPENDIX 4**

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### **DEVELOPMENT OF SA OBJECTIVES**

**Please refer to the CD contained within the Preferred Options Paper or visit**

**[www.west-norfolk.gov.uk](http://www.west-norfolk.gov.uk)**



## **APPENDIX 5**

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### **OBJECTIVES APPRAISAL MATRICES**

**Please refer to the CD contained within the Preferred Options Paper or visit**

**[www.west-norfolk.gov.uk](http://www.west-norfolk.gov.uk)**

## **APPENDIX 6**

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### **POLICY APPRAISAL MATRICES**

**Please refer to the CD contained within the Preferred Options Paper or visit**

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