

Sustainability Appraisal – Issues and Options Paper

Local Development Framework

King's Lynn & West Norfolk



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1.0 INTRODUCTION

- 1.1 Following the production of the Sustainability Appraisal (SA) Scoping Report in April 2005, in consultation with expertise within the authority, consultation will shortly take place with the four SEA Consultation bodies required by the SEA Directive (Countryside Agency, English Heritage, English Nature, Environment Agency), and other appropriate social and economic consultees outlined in Planning Policy Statement 12.
- 1.2 As part of the emerging Local Development Framework for King's Lynn & West Norfolk, an initial draft of the 'Issues and Options' report has been produced for public consultation. In order to prevent the possibility of 'consultation fatigue' the Scoping Report will be released for its statutory consultation in conjunction with the issues and options paper and the corresponding sustainability appraisal. With regard to the Scoping Report, comments received back from the statutory consultees will be incorporated into the document when comments are reviewed further through the process.
- 1.3 This document forms part of the initial stages of the sustainability appraisal which will evolve throughout the Core Strategy Development Plan Document production process, to eventually result in the production of a final sustainability appraisal report for the Core Strategy. The approach which has been adopted in this document and throughout the process is in accordance with the draft government guidance issued in September 2004 on the "Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks".
- 1.4 This approach is iterative, and government guidance on the SA process is only draft, the format and structure of the final report will evolve with the process and introduce any additional elements required by revisions to government guidance.
- 1.5 This appraisal had been carried out by the Policy Section of the Planning Service of the Borough Council of King's Lynn & West Norfolk, with the assistance of the authority's Corporate Policy Manager and other staff within the authority with particular sustainability expertise.

2.0 SUSTAINABILITY ISSUES IN KING'S LYNN & WEST NORFOLK

- 2.1 Sustainability issues are issues which deal with the social, environmental and economic effects of development, in the light of how they may affect the needs of future generations. The issues have been drawn from the views of Borough Councillors, the findings of public consultation undertaken as part of the Local Plan Review Process, other plans and strategies produced at the national, regional and local level as well as issues identified as part of the baseline assessment undertaken in the Sustainability Appraisal Scoping Report.
- 2.2 The issues identified as a result of village workshops and the Local Plan Issues Paper (2001) along with key planning issues emerging from national and regional guidance include the following:

Social Issues

- Housing provision should be appropriate to what people in West Norfolk need and can afford;
- Crime and nuisance concern the people of West Norfolk;
- Develop a safe, reliable transport system;

- Improve the health and well-being of local residents;
- How to deal with pockets of deprivation within the Borough;
- Reduce poverty and social exclusion;
- Improve the skills and education of the Borough;
- Lack of transport alternatives to the car, in particular cycling, and the limited availability of public transport, especially in rural areas;
- To improve accessibility to and availability of local services, facilities and amenities.

Environmental Issues

- Maintain the importance of West Norfolk's local identity and distinctiveness;
- West Norfolk's countryside should be protected for its own sake while enabling rural diversification;
- The local identity of West Norfolk's villages should be recognised;
- Make efficient use of water and other natural resources;
- To reduce vulnerability to the impacts of climate change, especially flooding;
- Energy efficiency measures and renewable energy sources and how to promote recycling;
- How to deal with the number of journeys being made by car and the high traffic levels;
- How to deal with the ongoing preservation of the Borough's heritage;
- Pressure on wildlife and habitats;
- Maintain and enhance the quality of landscapes and townscapes.

Economic Issues

- Local facilities and services are important in helping meet the needs of local people and loss of these facilities;
- Enable the development of a prosperous and diverse local economy;
- Development of a good telecommunication system is an essential part of the future for West Norfolk;
- West Norfolk's opportunities for tourism, sport, recreation and culture are important to our well-being and local economy;
- Developing King's Lynn as a sub-regional centre, focusing major new development in this area;
- New development in Downham Market and Hunstanton should be appropriate to their roles and functions;

3.0 THE SUSTAINABILITY APPRAISAL FRAMEWORK

3.1 The sustainability objectives have been developed as a result of the review of documents, analysis of baseline data and the identification of the sustainability issues identified previously. The full list of sustainability objectives defined in the Scoping Report is identified below, under the relevant sustainability appraisal topic headings.

Land & Water Resources

- Minimise the irreversible loss of undeveloped land and productive agricultural holdings. (LWR1)
- Minimise waste and reduce the use of non-renewable energy sources. (LWR2)
- Limit water consumption to levels supportable by natural processes and storage systems. (LWR3)

Biodiversity

- Avoid damage to designated sites and protected species. (B1)
- Maintain and enhance the range and viability of characteristic habitats and species. (B2)

Landscape, Townscape and Archaeology

- Avoid damage to protected sites and historic buildings. (LTA1)
- Maintain and enhance the diversity and distinctiveness of landscape and townscape character. (LTA2)
- Create places, spaces and buildings that work well, wear well and look good. (LTA3)

Climate Change and Pollution

- Reduce emissions of greenhouse gases and other pollutants (including air, water, soil, noise, vibration and light). (CCP1)
- Minimise waste production and support the recycling of waste products. (CCP2)
- Limit or reduce vulnerability to the effects of climate change (including flooding). (CCP3)

Healthy Communities

- Maintain and enhance human health. (HC1)
- Reduce and prevent crime, and reduce the fear of crime. (HC2)
- Improve the quantity and quality of publicly accessible open space. (HC3)

Inclusive Communities

- Improve the quality, range and accessibility of services and facilities (e.g. health, transport, education, training, leisure opportunities). (IC1)
- Redress inequalities related to age, gender, disability, race, faith, location and income. (IC2)
- Ensure all groups have access to decent, appropriate and affordable housing. (IC3)

- Encourage and enable the active involvement of local people in community activities. (IC4)

Economic Activity

- Help people gain access to satisfying work appropriate to their skills, potential and place of residence. (EA1)
- Improve the efficiency, competitiveness and adaptability of the local economy. (EA2)

4.0 EMERGING OBJECTIVES OF THE CORE STRATEGY

4.1 The following vision and objectives of the Core Strategy are listed below:

- 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, historic and architectural heritage; (CS1)
- Enable new development that respects the distinctiveness of our area while maximising the potential of our towns; (CS2)
- Make our towns, villages, facilities and services more accessible by a range of transport modes other than the car; (CS3)
- Provide adequate and appropriate opportunities for housing, jobs, shopping, leisure and tourism activities and to create a thriving and sustainable economy; (CS4)
- Develop King's Lynn as a Sub Regional Centre; (CS5)
- Promote sustainable development, using sustainable construction methods, making more use of previously developed land and using land more efficiently in locations with good services. (CS6)

5.0 TESTING THE SUSTAINABILITY OBJECTIVES AGAINST THE CORE STRATEGY OBJECTIVES

The matrix below tests the sustainability objectives against the Core Strategy objectives. The matrix does indicate that some negative impacts may exist between the two sets of objectives. Where a negative impact is identified between these, the conflicting objectives are assessed on subsequent pages.

Table 1: Matrix to Compare Sustainability Appraisal Objectives to Core Strategy Objectives

Core Strategy Objectives	Sustainability Appraisal Objectives																			
	Land & Water Resources			Biodiversity		Landscape, Townscape & Archaeology			Climate Change & Pollution			Healthy Communities			Inclusive Communities			Economic Activity		
	LWR1	LWR2	LWR3	B1	B2	LTA1	LTA2	LTA3	CCP1	CCP2	CCP3	HC1	HC2	HC3	IC1	IC2	IC3	IC4	EA1	EA2
CS1	+	0	0	+	+	+	0	0	0	0	0	0	0	+	-	0	-	0	0	-
CS2	0	0	0	-	-	+	+	+	0	0	0	0	0	0	-	0	-	0	-	-
CS3	0	0	0	0	0	+	+	+	+	0	0	+	0	0	+	0	-	0	0	0
CS4	+	0	0	-	-	-	-	+	0	-	-	0	0	-	+	+	+	+	+	+
CS5	0	0	0	0	0	0	+	+	0	0	+	0	0	0	+	0	+	0	+	+
CS6	+	0	0	+	+	+	+	+	0	0	+	0	0	0	0	0	0	0	0	0

Key:

- + = Positive Sustainable Impact
- = Negative Sustainable Impact
- 0 = No Sustainable Impact

Conflicting Objectives

- 5.1 ***Maintaining and enhancing the special qualities of the Borough may conflict with the need to improve the quality, range and accessibility of services and facilities.***

This would be the case if service provision was required in an area where the special qualities of the Borough were not fully realised.

- 5.2 ***Maintaining and enhancing the special qualities of the Borough may conflict in maintaining access to affordable housing for all.***

This may arise if a housing site is in or near an area of important landscape quality, AONB or conservation area, or even special quality in terms of biodiversity such as close to a nature reserve or an area where there is a wildlife consideration. Even areas of apparently ordinary countryside may be of special quality or biodiversity interest. However unless the development is heavily screened by trees, it is likely that the roofs of the dwellings will be visible, and they could be intrusive in the landscape. The use of particular materials, and minimising reflectance and design of elevations, may well provide some mitigation to this impact.

- 5.3 ***Maintaining and enhancing the special qualities of the Borough may conflict with the desire to improve the efficiency and competitiveness of the local economy.***

This may arise where the need to enable new development, or expansion to meet economic demands, is located within an area which is environmentally sensitive, and could jeopardise the special characteristics or features which makes the area so distinctive.

- 5.4 ***Enable new development that respects the distinctiveness of the area may conflict with maintaining and enhancing the range and viability of characteristic habitats and species.***

Whilst the development may well respect the distinctiveness of the area in terms of design, the scale of the development may well jeopardise an ecologically sensitive area, and could impact upon the long term survival of these characteristic habitats and species.

- 5.5 ***Enable new development that respects the distinctiveness of the area may conflict with improving the quality, range and accessibility of services and facilities.***

This may arise where the need for improving the quality, range and accessibility of services across the Borough, results in some conflict with the character and special qualities of the area, particularly if these are in environmentally sensitive areas, and a compromise will need to be made between further development to provide the necessary services and facilities against the detrimental impact this could have on the special qualities of the area.

- 5.6 ***Enable new development that respects the distinctiveness of the area may conflict with ensuring all groups have access to decent, appropriate and affordable housing.***

More housing in itself may require the allocation of Greenfield sites should existing Brownfield capacity prove insufficient. This allocation of housing into the countryside is likely to impact upon the landscape character and qualities of particular areas. As the objective is to provide access to decent, appropriate and affordable housing to all, this may result in the need for housing in areas where high densities are inappropriate, service and infrastructure provision is insufficient, and within an environmentally sensitive location. The cumulative effect of any such development within these locations will have a long term effect with high magnitude on the distinctiveness of the particular area.

5.7 ***Enable new development that respects the distinctiveness of the area may conflict with helping to gain access to satisfying work appropriate to skills, potential and place of residence.***

This may arise where it has been identified that particular employment sites are required to meet the appropriate skills, potential and place of residence. In reality, the location may prove to be exceedingly rural in nature, with insufficient infrastructure and as a result such development whilst meeting the employment needs of local people, would prove to be an inappropriate location. In addition the impact such development could have on the landscape character and qualities of an area needs careful consideration, as all settlements have their own distinctive character, and the design, size, mass and materials of such facilities could have inherent impacts on this character.

5.8 ***Enable new development that respects the distinctiveness of the area may conflict with improving the efficiency, competitiveness and adaptability of the local economy.***

Economic growth, particularly on a large scale is not always likely to be required in locations which respects environmental constraints. Whilst economic growth should be actively encouraged, this should not occur at the cost of the distinctiveness and qualities that make this area so special. Obviously the assessment of this special quality can be somewhat subjective, and the sensitivity to change is individualised. Apart from the inappropriate location of economic activity and landscape degradation, wider environmental degradation needs careful consideration. The location of industrial or economic development would be critical, a new estate on the edge of a town, or smaller units within or on the edge of a village, with poor public transport would generate more car journeys and not encourage an efficient pattern of movement, and create more traffic generation and therefore air pollution levels.

5.9 ***Make the Borough's services and facilities more accessible by a variety of transport modes may conflict with ensuring all groups have access to decent, affordable housing.***

This may arise if decent affordable housing is required in inaccessible areas, making promoting accessibility to the Borough's services and facilities by a variety of transport modes somewhat difficult to achieve. The balance needs to be made between meeting the needs for housing whilst realising that it may not be possible to enable accessibility by a variety of transport modes to services and facilities in particularly rural locations.

5.10 ***Create the opportunities for a thriving and sustainable economy may conflict with avoiding damage to designated sites and protected species.***

This may arise if the need for development to provide economic growth impacts upon designated sites and protected species, as the locational needs for economic growth, may not always respect such environmental constraints.

5.11 ***Create the opportunities for a thriving and sustainable economy may conflict with avoiding damage to protected sites and historic buildings.***

Additional economic growth, whilst deemed to be sustainable regardless of its density could have an impact upon the historic setting of both protected sites and historic buildings.

5.12 ***Create the opportunities for a thriving and sustainable economy may conflict with maintaining and enhancing the diversity and distinctiveness of the landscape and townscape character.***

Any significant economic growth and its subsequent development depending upon its density, design, scale, mass and materials could have a detrimental effect upon the diversity and distinctiveness of the landscape and townscape character.

5.13 ***Create the opportunities for a thriving and sustainable economy may conflict with limiting and reducing the vulnerability of the Borough to the effects of climate change.***

This will include the construction of new housing, the creation of employment, and opportunities for new leisure, shopping and tourism facilities. The creation of new development would create more impermeable surfaces and more runoff of storm water. This would be especially a problem if development is permitted in floodplains and areas liable to flood. Sustainable urban drainage systems need to be considered as a mitigation option. Additional development would mean the need for utilities such as water, gas and electricity. Sustainable construction methods could be used, encouraging sustainable water use, energy and building materials but the potential for conflict may still exist.

The provision of leisure, shopping and tourism facilities may also impact upon people's use of transport modes and how sustainable this is in terms of emission of greenhouse gases.

5.14 ***Create the opportunities for a thriving and sustainable economy may conflict with improving the quantity and quality of publicly accessible open space.***

Achieving a thriving and sustainable economy could bring with it the need for economic development and growth. The location of such development may create situations where the loss of open space may be inevitable. To mitigate such impacts, the need to provide additional provision whilst still making it publicly accessible becomes paramount.

6.0 REVISIONS OF THE PLAN OBJECTIVES AS A RESULT OF THE INITIAL SUSTAINABILITY APPRAISAL PROCESS

6.1 The plan objectives have been based upon the emerging Issues and Options Paper, whilst the Sustainability Appraisal Objectives are based upon the Sustainability Appraisal Scoping Report. It is important to note that both these documents are only draft, and changes may be required as a result of the consultation process.

7.0 SUSTAINABILITY EVALUATION OF THE STRATEGIC OPTIONS

7.1 The Issues and Options paper identifies a series of development options in terms of future development within the Borough. There are principally three basic strategic directions that could be taken in terms of future development. The following provides an evaluation of the environmental, economic and social implications of each option. In addition, the 'Do-Nothing' scenario, which was not considered as a viable option in the Issues & Options Paper, is evaluated as a plausible alternative to be appraised.

7.2 Option 1: Concentrated Strategy

This option would be paramount in developing King's Lynn as a sub-regional centre focusing 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 & 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. The lack of infrastructure to support any major development should be considered. 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 qualities 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.

7.3 Option 2: Town Growth Strategy

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.

7.4 Option 3: Geographic Spread

This option would appear to be 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 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 decline in perceived quality of life in these areas. This would result in a number of these villages becoming almost dormant settlements, losing their sense of community.

7.5 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.

7.6 Option 4: Do Nothing

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 buildings potentially spoiling the character and landscape of the area.

7.7 In reality 'Do Nothing' really is not a valid option, as the Borough Council is required under the Planning & Compulsory Purchase Act 2004 to produce a Local Development Framework for the Borough of King's Lynn & 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 & 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.

Table 2: Matrix to Compare the Options and the Sustainability Objectives

Sustainability Appraisal Objectives	Options			
	1	2	3	4
Land & Water Resources				
Minimise the irreversible loss of undeveloped land and productive agricultural holdings. (LWR 1)	+	-	-	+
Minimise waste and reduce the use of non-renewable energy sources. (LWR 2)	0	0	0	0
Limit water consumption to levels supportable by natural processes and storage systems. (LWR 3)	+	0	0	0
Biodiversity				
Avoid damage to designated sites and protected species. (B1)	+	-	-	+
Maintain and enhance the range and viability of characteristic habitats and species. (B2)	+	-	-	+
Landscape, Townscape and Archaeology				
Avoid damage to protected sites and historic buildings. (LTA 1)	+	-	-	+
Maintain and enhance the diversity and distinctiveness of landscape and townscape character. (LTA 2)	+	-	-	+
Create places, spaces and buildings that work well, wear well and look good. (LTA 3)	+	0	0	0
Climate Change and Pollution				
Reduce emissions of greenhouse gases and other pollutants (including air, water, soil, noise, vibration and light) (CCP1)	+	-	-	-
Minimise waste production and support the recycling of waste products (CCP2)	0	0	0	0
Limit or reduce vulnerability to the effects of climate change (including flooding) (CCP3)	+	-	-	0
Healthy Communities				
Maintain and enhance human health (HC1)	0	0	0	0
Reduce and prevent crime, and reduce the fear of crime (HC2)	0	0	0	0
Improve the quantity and quality of publicly accessible open space (HC3)	0	0	0	0
Inclusive Communities				
Improve the quality, range and accessibility of services and facilities (eg health, transport, education, training, leisure opportunities) (IC1)	+	-	-	0
Redress inequalities related to age, gender, disability, race, faith, location and income (IC2)	0	0	0	0
Ensure all groups have access to decent, appropriate and affordable housing (IC3)	+	+	+	-
Encourage and enable the active involvement of local people in community activities (IC4)	+	0	0	0
Economic Activity				
Help people gain access to satisfying work appropriate to their skills, potential and place of residence (EA1)	+	+	+	0
Improve the efficiency, competitiveness and adaptability of the local economy (EA2)	+	+	0	0

Key: + = Positive Sustainable Impact
 - = Negative Sustainable Impact
 0 = No Sustainable Impact

8.0 CONCLUSIONS & MITIGATION MEASURES

8.1 The Government guidance on the SA process is only draft, and there may be the need to introduce new elements to the report at a later date.

8.2 The outcome of this appraisal would identify that Option 1 is the most sustainable option for meeting the vision in delivering King's Lynn sub-region, as well as preserving and enhancing the unique character and special qualities of the area. Option 2 would be the second choice in terms of sustainability, with Option 3 really not being sustainable in terms of excessive inappropriate development in villages. Option 4 the 'Do Nothing' scenario, whilst considered as part of the appraisal process, is not a realistic option for development in King's Lynn & West Norfolk over the next 20 years. Whilst this is the indication of the sustainability appraisal, it remains to be seen how the community will respond to the options through the public participation process.

Mitigation Measures

8.3 The main deficiencies of the options as identified by the matrix in section seven which compares the options against the sustainability appraisal objectives are shown in the table below with an indication of how those deficiencies can be mitigated. These deficiencies are identified by any negative impacts from the sustainability objectives against the four options under appraisal. These are just suggestions as to possible mitigation measures, as the options need to go through extensive public consultation.

Table 3: Deficiencies and Mitigation Measures

Deficiencies	Mitigation
Possible irreversible loss of undeveloped land and productive agricultural holdings	Tree Planting, encouragement of alternative methods of agriculture, agricultural diversification inc horticulture etc.
Possible adverse effect and damage to designated sites and protected species, which could affect the range and viability of characteristic habitats and species	Using S106 Agreements, promote the creation of new habitats, and the protection of existing
Avoid possible damage to protected sites and historic buildings	Strengthen controls with concise policy formulation to prevent any degradation to protected historic sites and buildings as a result of any proposed development
Problems with maintaining and enhancing the diversity and distinctiveness of landscape and townscape character	Appropriate density for the locality, careful use of landform, sensitively chosen building materials, lower density on the edge of the development
Reduce emissions of greenhouse gases and other pollutants (including air, water, soil, noise, vibration and light)	Tree planting to act as Carbon stores, consideration of energy efficient construction for development, limit use of natural resources such as water, and careful use of landform to mitigate noise, vibration, light and air pollution
Limit or reduce vulnerability to the effects of climate change (including flooding)	Sustainable construction methods, promote car sharing, home working, integrated public transport
Improve the quality, range and accessibility of services and facilities (eg health, transport, education, training, leisure opportunities)	Aim to give a fair spread of services throughout the Borough, the need to be identified in the Community Strategy
Ensure all groups have access to decent, appropriate and affordable housing	Ensure density, design, massing, and materials is appropriate to the landscape, special qualities of the area and level of service provision



Sustainability Appraisal – Issues and Options Paper

Local Development Framework

King's Lynn & West Norfolk Planning Services

June 2005



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