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1. Introduction
1.1 Sustainability Appraisal looks at the impacts which the Core Strategy policies, plans and proposals will make in terms of impact on the environment, economy and social issues in the Borough. Where necessary it makes recommendations for improvement by suggesting ways to mitigate or compensate for possible adverse effects or suggests that an approach would have detrimental impact and therefore should be discarded.

1.2 The Sustainability Appraisal process goes through 4 main phases. Firstly the main issues of the area are identified. For example the strengths, weaknesses and opportunities in the area. Possible answers to these issues are then explored through the next stage which is when objectives or policies are explored. These policies look at how issues can be overcome or mitigated for and how opportunities can be met. The policies are then analysed in the next phase of the process to see which options are the most sustainable and provide the most gain and then the last phase scores the most favourable policy against a series of Sustainability Appraisal objectives. These scores will serve to show whether the policy has a positive negative or mixed effect on these objectives.

1.3 The purpose of the Sustainability Appraisal is to:
- Identify environmental, social and economic issues that impact on the Core Strategy and Local Development Framework process.
- Assess the environmental, social and economic qualities of the Borough and how these are changing
- Evaluate the significant positive and negative effects of the Core Strategy policies.
- Document how the Sustainability Appraisal has been used in the development of Core Strategy policies.

1.4 This report is the third stage in the Sustainability Appraisal process for the submission Core Strategy of the King’s Lynn and West Norfolk Local Development Framework. This report has been preceded by a Sustainability Appraisal Scoping report published in 2005 and the Sustainability Appraisal report for the Preferred Options paper published in 2006. This was subject to written consultation with the four main statutory bodies (English Nature, The Countryside Agency, Environment Agency and English Heritage) prior to publication. The recommendations from previous Sustainability Appraisal reports along with further evidence gathering have enabled continuous refinement of approaches to ensure sustainable and appropriate approaches.

1.5 Following the Preferred Options paper consultation in October to November 2006 and then subsequently the public consultation on the Regulation 25 document form February to April 2009, work commenced on analysing the representations received and drafting policies for the submission Core Strategy. From April 2009 to November 2009 the draft proposed submission document underwent Sustainability Appraisal. This time the Sustainability Appraisal focused on strategic policies and those
policies that were new or significantly different to the Preferred Options policies.

1.6 The Scoping report for the Issues and Options paper was undertaken internally, the Sustainability Appraisal for the Issues and Options Paper and the Preferred Options was undertaken by Land Use Consultants. This Sustainability report for the Submission Core Strategy document has been undertaken by planners in the Planning Policy Team as this would integrate it into plan preparation and inform policies as they developed.

1.7 This Sustainability Appraisal Report will be published alongside the submission Core Strategy and the responses from that consultation will inform the final report.

2.0 Context and baseline review
2.1 An important part of the Sustainability Appraisal process involves assessing other plans, policies, programmes, strategies and projects that would have some influence on the Core Strategy and the Sustainability Appraisal process.

International, national, regional, and local level plans and strategies were scoped covering the Sustainability Appraisal categories of social, environmental and economic documents. The exercise identified issues, opportunities and challenges that need to be addressed. It also helped to identify social, environmental and economic objectives that need to be reflected in the Sustainability Appraisal framework.

2.2 Analysis of the baseline data and feedback from sessions with Council staff and stakeholders helped to identify the areas local characteristics and identified key issues for the Borough.

2.3 The main sustainability issues are summarised below.

3.0 Key strategic issues facing the Borough

3.1 Environment
- Impending climate change and issues associated with it.
- Much of the Borough is low-lying, meaning that it may be at risk of flooding. Coastal locations are particularly at risk.
- There is a potential lack of water resources due to over abstraction, and climate change leading to decreased water availability.
- The Borough is renowned for its wildlife, geology and natural resources, which should be protected from any negative impacts of development.
- Loss and disturbance to fragile habitats and species susceptible to climate change.
- The Borough has a large number of designated sites protecting sensitive habitats and species.
• The Borough contains part of the Norfolk Coast Area of Outstanding Natural Beauty, which will require protection.
• The Borough has over 100 Scheduled Ancient Monuments, around 2000 Listed Buildings, 5 Historic Parks and Gardens and buildings and landscapes with cultural value.
• Greenhouse gas emissions from the Borough are contributing to climate change, and are higher than the national average.
• Air Quality targets are unlikely to be met for nitrogen dioxide and PM10.
• Government targets for a reduction in energy demands is rising therefore obtaining energy from renewable energy sources is needed as well as improving efficiency improvements in buildings.
• Increasing levels of household (and municipal) waste produced.
• Increased impact of traffic on town centres and rural areas.
• High percentage of journeys to work undertaken by car.
• Still high percentage of homes not energy efficient.
• Pressures of visual intrusion of some renewable technologies in the landscape.
• Water supply, management and drainage problems.
• Lack of surveys prior to planning decisions.
• Some SSSI’s not in ‘favourable’ condition.
• Local areas of biodiversity and geodiversity which have no statutory protection susceptible to impact of development.
• High number of vacant dwellings.
• Areas of poor quality environment in urban areas.
• Threatened landscape character.

3.2 Social
• Unsustainable transport patterns as a result of dispersed populations.
• Low skills base in the Borough under national average for GCSE’s and A levels.
• There are higher proportions of people living with limiting long term illnesses in the Borough than the national, regional or county averages.
• The difference in life expectancy between the best and worst wards in the Borough is over 10 years, representing significant health inequalities.
• The Borough has an ageing population. This places demands on the health/care sector and means a shortage of residents of working age.
• Lack of facilities for young people. This leads to younger people leaving the area and not returning.
• 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.
• There is a low proportion of affordable housing developed in the Borough as well as a poor mix of housing types and sizes.
Impact of communities particularly on the coast from 'second homes'.

Hunstanton, and other coastal locations, have significant retired populations, which creates an imbalance in the age structure.

The isolated rural nature of parts of the Borough leads to inaccessibility of essential services and facilities.

Increasing rural populations are increasing demand for housing and service provision in the countryside.

Withdrawal of village services.

Low proportion of journeys to work on foot or by cycle.

Lack of courses and access to educational classes in rural areas of the Borough.

High perception of crime.

Poor access to public transport.

Poor Broadband coverage.

Shortage of local services such as surgeries, schools, post offices, village shops and local leisure facilities.

Insufficient infrastructure and facilities to support new housing development.

Low average earnings.

High average property price to income ratio.

Lack of community spirit in some wards.

Low electoral turnout in local authority elections.

Low number of Parish Plans.

3.3 Economy

Attracting and retaining key workers in the Borough.

There is a high level of employment in agriculture and manufacturing in the Borough, compared with other districts in Norfolk, and Britain in general, reflecting the focus on low-skilled employment sectors.

Average earnings in the Borough are lower than both the national and regional averages.

King’s Lynn is under performing in terms of services, the economy, housing and tourism given its role as a significant centre.

Some areas of King’s Lynn town centre appear uncared for and unsafe.

An increase in residential development in Downham Market has led to the town outgrowing its compact market town characteristics and facilities.

Downham Market has suffered from a number of years of underinvestment, and is in need of improvement of its visual amenity and regeneration of the economy.

Downham Market is used as a dormitory town due to location on the main line to Cambridge and London. This leads to under spending in the town and lower community spirit.
The seasonal nature of visitors to Hunstanton and other coastal locations lead to variations in population and demands on local services.

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.

Changes in farming needs and practice mean that agricultural diversification is needed.

Loss of high quality agricultural land.

Poor perception of the King’s Lynn area.

Lack of serviced employment land in the right locations to meet the needs of local business and inward investment.

Low business formation and survival rate.

Number employed in tourism is low given the relative importance of the Borough.

Lack of cultural and quality night time economy.

Poor transport links.

Lack of investment.

4.0 How Sustainability Appraisal has been used in developing Core Strategy policies

4.1 Sustainability Appraisal has proved to be very useful in terms of shaping policies in the Core Strategy. It has helped to identify social, economic and environmental issues in the Borough and helped to shape solutions, compare options and discard options which are unsustainable and lead to detrimental impacts.

This meant that during formation of the policies, potential adverse impacts could be lessened by appropriate mitigation or a change in policy or policy wording and positive impacts could be maximised. The Sustainability Appraisal also explored the impacts of the ‘Do Nothing’ approach and to show what sort of impact this would have on the policies and whether this was a realistic option.

4.2 Sustainability Appraisal also helped to identify areas of the Core Strategy which needs to be monitored and where policies need to be strengthened. This has meant that certain subjects such as heritage and culture which have previously not had a strong presence in the document now have been highlighted as issues which need to be resolved and safeguarded in the policies.

4.3 In developing policies for the Core Strategy, Sustainability Appraisal was used in conjunction with responses to consultation (written and questionnaire) and workshops which included Parish Councils, District Councillors, officers, stakeholders and interested members of the public. Local regional and national strategies were also incorporated into policy formation.
5.0 Sustainability Appraisal of Core Strategy objectives

5.1 The Scoping Report contains sustainability objectives and indicators which establish the framework to appraise the Core Strategy policies. These objectives were developed by consultants during the last Sustainability Appraisal for the Preferred Options Paper. The objectives were used in order to provide a robust and objective method of assessing the Core Strategy policy areas. The objectives cover social, economic and environmental issues of sustainability.

5.2 In total, there are 20 objectives to deliver this vision:

1. Minimise the irreversible loss of undeveloped land and productive agricultural holdings.
2. Minimise waste and reduce the use of non-renewable energy sources.
3. Limit water consumption to levels supportable by natural processes and storage systems.
4. Avoid damage to designated sites and protected species.
5. Maintain and enhance the range and viability of characteristic habitats and species.
6. Avoid damage to protected sites and historic buildings.
7. Maintain and enhance the diversity and distinctiveness of landscape and townscape character.
8. Create places, spaces and buildings that work well, wear well and look good.
9. Reduce emissions of greenhouse gasses and other pollutants (including air, water, soil, noise, vibration and light).
10. Minimise waste production and support the recycling of waste products.
11. Limit or reduce vulnerability to the effects of climate change (including flooding).
13. Reduce and prevent crime, and reduce the fear of crime.
14. Improve the quantity and quality of publicly accessible open space.
15. Improve the quality, range and accessibility of services and facilities (e.g. health, transport, education, training, leisure opportunities).
16. Redress inequalities related to age, gender, disability, race, faith, location and income.
17. Ensure all groups have access to decent, appropriate and affordable housing.
18. Encourage and enable the active involvement of local people in community activities.
19. Help people gain access to satisfying work appropriate to their skills, potential and place of residence.
20. Improve the efficiency, competitiveness and adaptability of the local economy.

5.4 The Core Strategy objectives were assessed against the Sustainability Appraisal objectives to show their compatibility with the principles of
sustainable development which helped to inform discussion on the objectives.

5.5 The main areas of possible conflict are between the sustainability objectives relating to the environment and the Core Strategy objectives relating to housing and development, growth of some of the villages, development and increase of services and facilities in the coastal area of the Borough and direct and indirect impacts on our landscape, heritage, biodiversity and geodiversity. These conflicts have been minimised by implementing mitigation and compensation where no alternatives can be found. For example by looking to develop in areas previously developed, avoiding areas of greatest risk to flooding and by introducing green infrastructure into new development to encourage biodiversity.

6.0 Likely significant effects of the submission King’s Lynn and West Norfolk Core Strategy

6.1 Significant positive impacts as a result of the submission Core Strategy policies have been identified through the Sustainability Appraisal. In terms of environmental objectives, positive impacts can be seen by adapting to the threats of climate change, protecting and enhancing heritage, biodiversity and geodiversity assets in the Borough, minimising the loss of Greenfield land, enhancement of landscape and townscape character, responding to issues of flood risk, and promotion of sustainable design and energy efficiency which will reduce emissions and create a healthier environment in the Borough.

6.2 In regards to the economy, several significant positive impacts as a result of the Core Strategy policies have been identified. These include provision of employment opportunities, increase of affordable housing, and improving the efficiency, competitiveness and adaptability of the local economy.

6.3 Significant social positive impacts of the polices include improving access to work, services and facilities, supporting residents to acquire skills to improve chances of finding suitable employment, increase of the quality, quantity and accessibility of services and facilities, creation of spaces, places and buildings which work well, reducing crime and the fear of crime and the provision of public open space.

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

6.5 There will be some impacts felt in the short to medium term whilst development and projects take place. In the long term there will be increased employment facilities, areas of regeneration and more sustainable developments where people have better access to services and facilities.
6.6 There are some potential negative impacts which could occur as a result of the Core Strategy policies. Growth is needed in the Borough in order to create a healthier economy and provide more opportunities and benefits to residents and visitors in the Borough. Although this growth is needed, there may be impacts, for example impact of increased development on the landscape, impact of development on historic, biodiversity and geodiversity sites and loss of land and development to the sea. An increase in population will mean an increase in pollution, waste, loss of land and higher usage of energy.

6.7 Most significant negative effects are mitigated for by other policies in the Core Strategy. Some policies work together to have synergistic beneficial effects for example by locating development in sustainable locations will reduce the use of the private car and provide better access to services and facilities.

6.8 Impacts however are not certain and the Council will work with service providers and partners to deliver solutions and to mitigate and monitor effects. Further mitigation and possible solutions to these impacts are explored in the full Sustainability Appraisal which accompanies this Non Technical Summary.
7.0 Monitoring the significant effects of the Core Strategy
7.1 A monitoring framework will sit in the Council’s Annual Monitoring Report in addition to national core indicators to monitor likely significant effects of the Core Strategy every year.

8.0 Conclusion
8.1 Through the process of Sustainability Appraisal the majority of the Core Strategy polices are likely to have a positive impact on the Sustainability Appraisal objectives. There are a couple of policies that will have a negligible effect and one policy that will have a negative effect on the Sustainability Appraisal objective of limiting the loss of Greenfield land. This is due to the high levels of growth envisioned and needed in the Borough. However the plan does stipulate that brownfield land will be targeted first for development and that development will need to be in sustainable locations with good access to services and facilities. Therefore this can be mitigated to some extent.
Appendix 1

Core Strategy Policies
9.0 Sustainability Appraisal of submission Core Strategy policies

There are 14 policies in the Regulation 25 Document of the Core Strategy, as submitted to the Secretary of State.

These are listed below:

CS01 Spatial Strategy  
CS02 Settlement Hierarchy  
CS03 Strategic Development within King’s Lynn  
CS04 Strategic Development within Downham Market  
CS05 Strategic Development within Hunstanton  
CS06 Development in Rural Areas  
CS07 Development in Coastal Areas  
CS08 Sustainable Development  
CS09 Housing Distribution  
CS10 Economy  
CS11 Transport  
CS12 Environmental Assets  
CS13 Community and Culture  
CS14 Infrastructure

The Sustainability Appraisal framework was used to assess the significant social, environmental and economic effects of each preferred option policy. The main findings are summarised in the table below. The final row summarises the cumulative effects of all the policies combined. This gives a likely indication of the impact of the Core Strategy as a whole on each of the Sustainability Appraisal objectives.
10.0 Appendix 2

Table: The impact of submission Core Strategy policies on the Sustainability Appraisal objectives.
### Table: The impact of submission Core Strategy policies on the Sustainability Appraisal objectives.

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**Key**

- **++** Significant positive effect
- **+** Positive effect
- +/- Mixed Effect
- 0 Negligible effects
- - Negative effect
- -- Significant negative effect
- ? Unknown effect