



Borough Council of King's Lynn and West Norfolk Local Plan Review (2016 – 2036):

**Sustainability Appraisal (SA) Incorporating Strategic Environmental Assessment (SEA)
for the Local Plan Review 2020**

Non-Technical Summary (including information relating to the SA Addendum 2022)

July 2022

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1. Introduction

Purpose of this document and relationship to previous Sustainability Appraisal work

- 1.1 This Non-Technical Summary (NTS) of the Sustainability Appraisal (SA) Incorporating Strategic Environmental Assessment (SEA) 2020 was produced in June 2022 in support of the Borough Council of King's Lynn and West Norfolk Local Plan Review. It should be read in conjunction with the Scoping Report (2017), Scoping Report update (2020), SA Incorporating Strategic Environmental Assessment (SEA) 2020¹, and the SA Addendum 2022.
- 1.2 The NTS summarises the methodology and main findings of the full SA documents and is intended to provide an overview of the associated processes in plain English. The production of a non-technical summary is a requirement of the SEA Directive.
- 1.3 The Borough Council is obliged to undertake a Sustainability Appraisal (SA) of each development plan document (Planning & Compulsory Purchase Act 2004²) to inform the preparation of the *Borough Council of King's Lynn & West Norfolk Local Plan Review* and to assess the anticipated impacts. The Borough Council has determined that the nature and scope of the Local Plan review mean it is likely to have significant environmental effects (in the terms of Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations 2004³) and consequently a SEA is required. Although the requirements for a SEA are distinct from those for SA, they can overlap substantially in terms of process and content. Therefore, the required SEA has been integrated into this SA. Whilst the SEA looks at the environmental impacts, the SA also looks at the wider economic and social impacts.
- 1.4 The full SA documents set out how planning decisions have been made, and how they have been informed by environmental and sustainability concerns.
- 1.5 A separate Habitats Regulation Assessment as required by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019⁴ has been carried out and is available on the Council's website⁵.

¹ https://www.west-norfolk.gov.uk/info/20216/local_plan_review_2016_-_2036/882/proposed_pre-submission_local_plan_review_documents

² Planning and Compulsory Purchase Act 2004 (legislation.gov.uk)

³ [Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment \(legislation.gov.uk\)](http://legislation.gov.uk)

⁴ The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 ([legislation.gov.uk](https://www.legislation.gov.uk))

⁵ <https://www.west-norfolk.gov.uk/info/20216/local-plan-review-2016-2036/882/proposed-pre-submission-local-plan-review-documents>

The Local Plan Review

- 1.6 The Borough Council is the local planning authority for King's Lynn and West Norfolk and has the responsibility for preparing a Local Plan for the area, and for determining planning applications in the Borough⁶. The Borough Council must prepare its Local Plan with the objective of contributing to the achievement of sustainable development.
- 1.7 The adopted Local Plan is comprised of two development plan documents. The first is the Core Strategy (CS), adopted in 2011, and the second is the Site Allocations and Development Management Policies Plan (SADMP), adopted in 2016.
- 1.8 The CS provides strategic level guidance as to growth and significant issues across the Borough in the period to 2026. It is the main document setting out the long-term strategy, including the vision and objectives for the Borough, and the broad policies that will steer and shape new development.
- 1.9 The SADMP gives effect to and complements the CS. This is done through the provision of allocations to meet aspirations of the CS. It also provides a series of detailed development management policies which assist in guiding development.
- 1.10 The Borough Council has reviewed the CS and SADMP, with the intention of producing a single document plan. The Local Plan Review (LPR) contains Strategic Policies, Site Allocations, and Development Management policies. The LPR plan period runs from 2016, when work commenced on the review and the baseline, through to 2036. The Plan period is currently being reconsidered through the Examination process (proposed 2038/39 end date), although this NTS has been prepared with reference to the timeframe for the Local Plan, as submitted in March 2022 (2016-2036).
- 1.11 The LPR has been developed in relation to the current and emerging plans for the adjoining districts and the wider region. As well as restructuring the existing plan documents and updating policies in line with updates to the NPPF and other statutory requirements, the Local Plan Review:
- Sets a Strategic Direction of Growth: King's Lynn (West Winch & South Wootton), Downham Market, Hunstanton, A10/Rail Corridor and rural areas.
 - Ensures an appropriate five-year housing land supply.
 - Includes new policies for Climate Change and the Norfolk Coast AONB.
 - Increases protection for the Natural Environment.
- 1.12 Revised and new policies within the LPR will support development in smaller villages and hamlets with additional support for communities involved in neighbourhood planning. The LPR provides a framework to support affordable housing and other housing types (such as self-build), the local economy and businesses and infrastructure.

⁶ Responsibility for minerals planning and waste planning in the Borough lies with Norfolk County Council

- 1.13 Once adopted the LPR will be the Local Plan for King's Lynn and West Norfolk. The Local Plan is, together with neighbourhood plans, the statutory development plan for the Borough. Planning applications must be determined in accordance with the Local Plan, unless material considerations indicate otherwise.

2. Methodology

- 2.1 Table 2.1 in the SA 2020 outlines the 'Stages of Sustainability Appraisal' which sets out the main stages in preparation of the SA for the KLWNLPR. Figure 1 below incorporates the work of the SA Addendum in relation to the five stages of Sustainability Appraisal (A to E).

Figure 1: Stages of Sustainability Appraisal in relation to the SA Addendum 2022

Stage	Summary	Implementation Part 2 (Update of the SA)	Implementation Part 2 (Update of the SA)	SA Addendum 2022
A Scoping	Setting the context and objectives, establishing the baseline, and deciding on the scope	The Scoping report set these successive components for the Local Plan review. This followed consultation with Natural England, Historic England and the Environment Agency (the relevant bodies) in 2016/2017.	The Scoping report was updated in the early part of 2020 to reflect on the suggestions made by statutory consultees (Natural England, Environment Agency and Historic England) and suggestions made through representations at the Reg.18 Stage. This involved rethinking the detail into the SA objectives and Site sustainability factors (particularly for climate change) and updating the baseline data to reflect new changes needing to be reflected further in the Local Plan Review. The Scoping Report Update was consulted upon with Environment Agency,	The context and objectives have been reviewed following consultation responses, including comments from Natural England.

Stage	Summary	Implementation Part 2 (Update of the SA)	Implementation Part 2 (Update of the SA)	SA Addendum 2022
			Historic England and Natural England in July/August 2020	
B Option Testing	Developing and refining options	This is undertaken through the formulation of the draft Local Plan SA/SEA. This will identify a set of preferred options and reasonable alternatives. This will be refined following consultation on the draft Local Plan review	The formulation of the Local Plan SA/SEA identified the set of preferred options and this was redefined with further detail including the new additions of sustainability objectives/factors.	The SA Addendum 2022 considers the amendments made in 2020 and 2021 and how their impact affects the appraisal undertaken in the SA 2020, including a consideration of alternative and preferred options.
C Assessing Plan	Appraising the effects of the Plan	The version of the SA/SEA which will support the Local Plan review submission consultation will outline the assessment of the anticipated effects of the plan, as this version of the SA/SEA does, however it will also contain details of the refinement and elaboration in light of comments received from the draft Local Plan review consultation	The SA/SEA has taken note of the representations made at the Reg.18 consultation stage of the Local Plan Review. This updated version has refined the data and detail which has been added to the scoping report and addressed adding new detail to the SA objectives, current Local Plan Policies and to newly implemented policies to improve sustainability.	The SA Addendum 2022 considers the impact of the amendments on individual policies and cumulatively within the Plan.
D Consulting	Consulting on the Plan and SA/SEA Report	Consultation will take place on the draft Local Plan review and SA/SEA which accompanies it. The final SA/SEA will accompany the submission version of the Plan	Consultation will take place on the final Local Plan Review, accompanied by the final SA/SEA for the submission version of the plan.	The Plan and the SA/SEA Report have been prepared as part of the Local Plan Examination and have been consulted on through the plan making process.
E Monitoring	Monitoring the implementation of the Plan	The implementation of the Plan, and its suitability impacts, will be monitored primarily through the Borough Council's Annual Monitoring Report (AMR)	The implementation of the Plan, and its suitability impacts, will be monitored primarily through the Borough Council's Annual Monitoring Report (AMR)	The Council will publish a Post-Adoption Statement on the adoption of the Local Plan Review, confirming how the SEA process was undertaken.

Stage	Summary	Implementation Part 2 (Update of the SA)	Implementation Part 2 (Update of the SA)	SA Addendum 2022
				Following adoption of the LPR, the Council will monitor the impacts of the Plan primarily through the Authority's Monitoring Report (AMR).

- 2.2 The preparation of a Local Plan and SA is an iterative process. Figure 2 sets out the processes involved in the preparation of the SA in relation to the process of preparing a local plan.

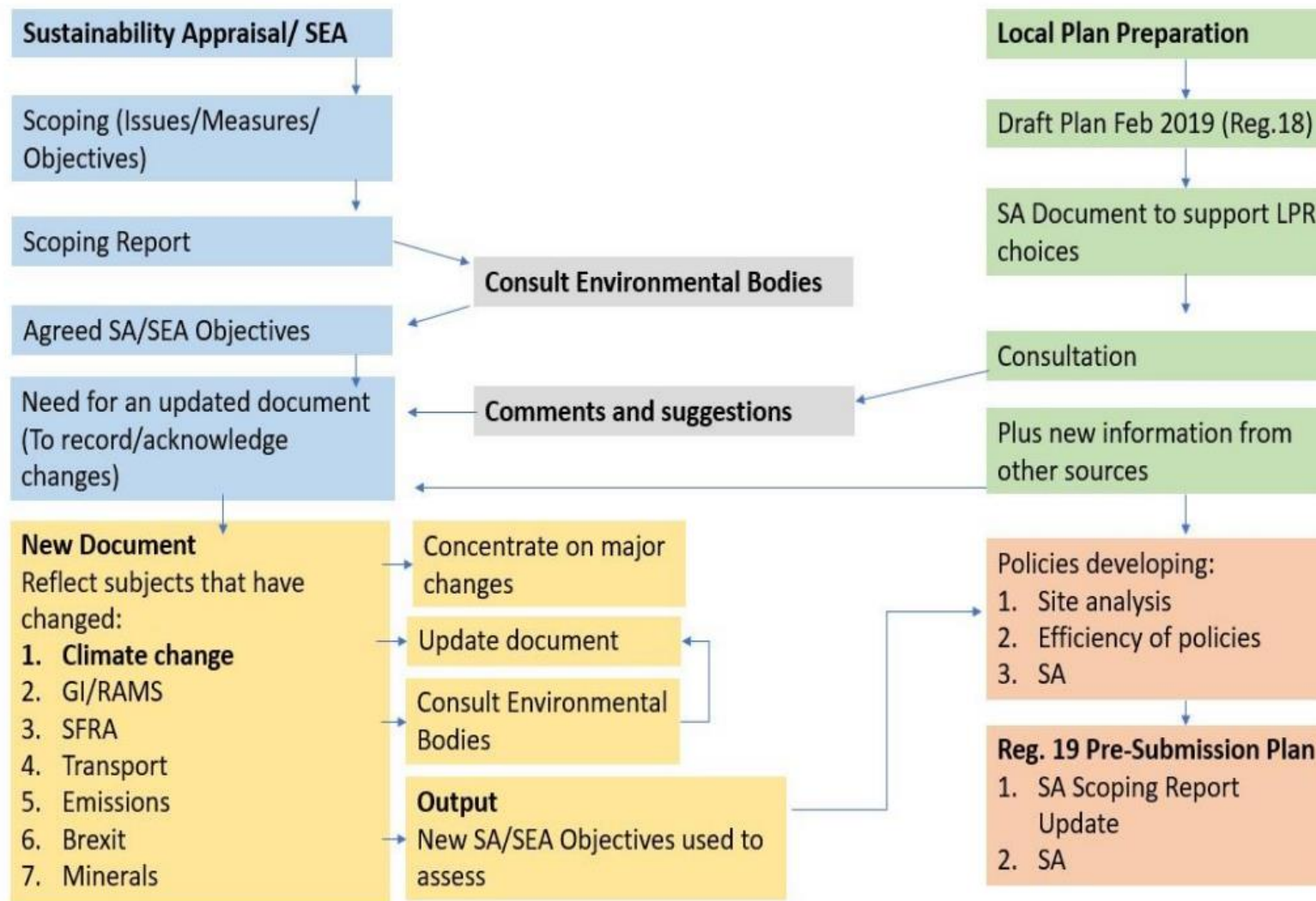


Figure 2: Relationship between SA and Local Plan Preparation (SA 2020)

- 2.3 The diagram below (Figure 3) illustrates the site selection process. Clearly this is simplified, as information could be submitted as part of a consultation which could potentially mean that a rejected site could be re-considered within the SA/SEA. Preparation of a sustainability appraisal is iterative, in the same way as the wider preparation of a local plan.

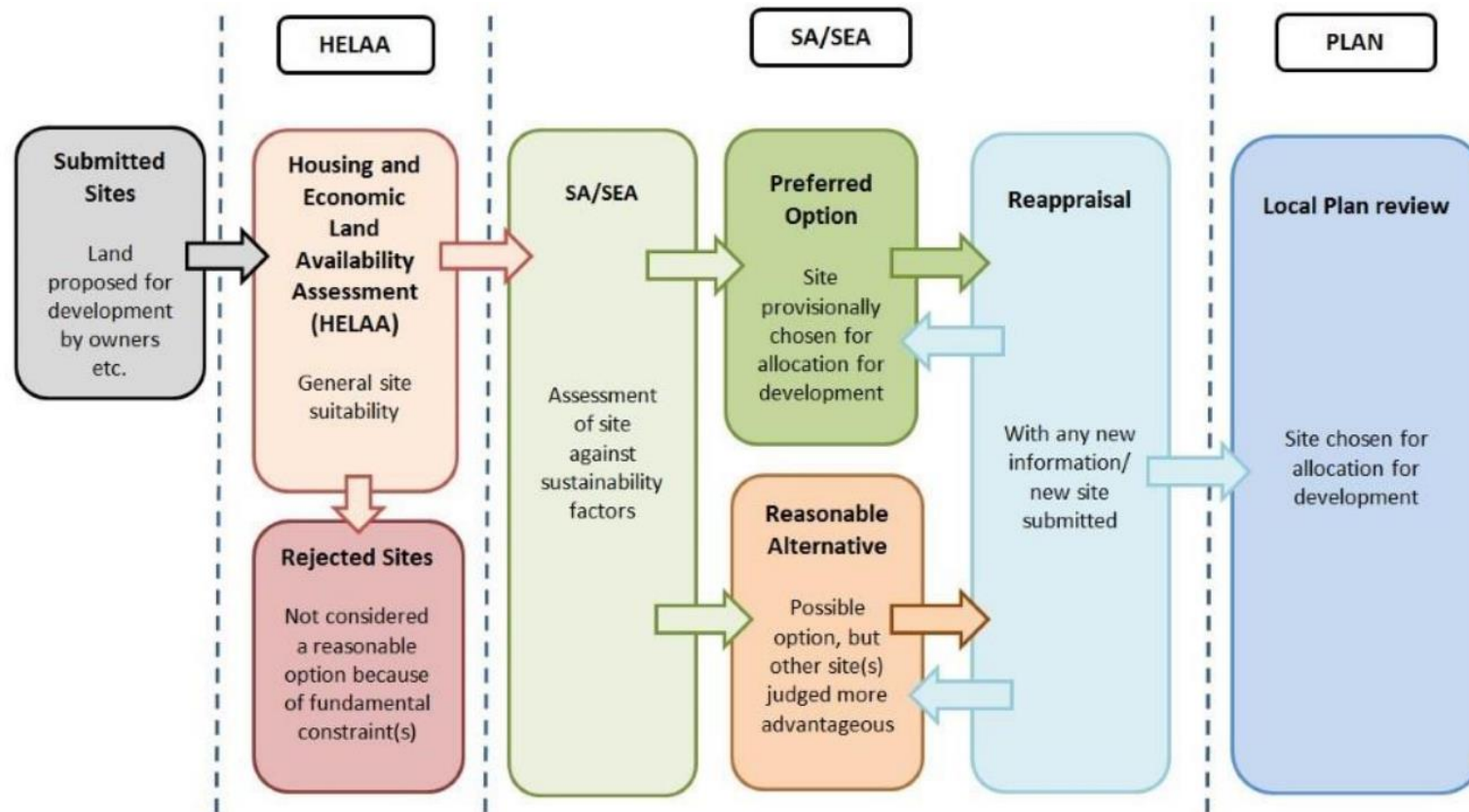


Figure 3: Site Selection process (SA 2020)

Outline of Methodology

- 2.4 The SA considers the Strategic Policies and Development Management policies as ‘Non Site-Specific’ and Site Allocations as ‘Site-Specific’. The criteria used are set out in Sustainability Objectives (Appendix 1) for Non Site-Specific policies and Site Sustainability Criteria (Appendix 2) for Site Allocations. Interactions between these two sets of indicators are set out in Appendix 3. The scoring criteria is set out in Appendix 4.

Scoping Report (2017) and Updates to the Scoping Report

- 2.5 The Sustainability Appraisal Scoping Report Review (2017)⁷ involves setting the context for the SA and includes a review of the base line data and relevant plans and programmes.
- 2.6 The Scoping Report was reviewed in 2020 and the Sustainability Objectives were updated in light of:
1. Representations made at the Regulation18 Consultation Stage
 2. The rising importance of climate change within the national and local agenda
 3. Changes within the Borough
- 2.7 The main change was the inclusion of a revised objective relating to climate change and pollution to reflect the growing awareness of the climate change agenda. It was considered that identified sustainability issues could largely be addressed by the original Sustainability Objectives from 2006 and 2017 with the addition of the Climate Change and Pollution Objective, as set out below in Figure 4. A full table of Sustainability Objectives is set out in Appendix 1.

Topic	Local Plan Review Sustainability Objectives	SEA Environmental Effect ‘Issues’
Climate Change and Pollution	<p>8. Reduce pollution and GHG emissions that affect the quality of land, air, water or soils in the Borough including: noise, light, vibrations. Mitigate GHG emissions by moving towards sustainable transport systems and reducing the reliance on fossil fuel-based vehicles.</p> <p>9. Minimise waste production, reduce the use of non-renewable energy sources and support the recycling of waste products.</p>	<ul style="list-style-type: none">• Soil• Water• Climatic factors• Material assets• Coastal erosion/ Flood risk• Energy• High GHG emissions• Design & quality

⁷ https://www.west-norfolk.gov.uk/info/20216/local_plan_review_2016_-_2036/629/sustainability_appraisal

Topic	Local Plan Review Sustainability Objectives	SEA Environmental Effect 'Issues'
	<p>10. Minimise vulnerability and provide resilience and adaptation to climate change, taking account of flood risk and coastal change.</p> <p>11. New development should be designed to be better adapted to climate change and flood risk.</p>	<ul style="list-style-type: none"> • Transport

Figure 4: New Objective relating to Climate Change

SA and SEA 2020

- 2.8 A summary of the assessments is set out in Section 3 of this document. The SA 2020 considered options for each draft policy and site allocations, as well as the spatial distribution (or cumulative impact) of the site allocations. The assessments reflected information from officers, specialist advice (including statutory consultees) and through public consultation.
- 2.9 The SA process identified a set of 'preferred options' and these were incorporated into later drafts of the Local Plan Review, and revised through the consultation process, as set out in Section 4.
- 2.10 Section 3 of the SA 2020 concluded that the site-specific and non site-specific policies within the Plan would overall have a positive impact on sustainability.

SA Addendum 2022

- 2.11 The SA Addendum 2022 considers all the amendments made between 2020 and 2021. Amendments were screened to understand if the proposed changes would result in positive or negative material changes to the policies assessed within the KLWN SA 2020.
- 2.12 Where it was deemed necessary to re-appraise policies in light of the changes made, an updated assessment was undertaken against the updated objectives. Where policies were re-appraised, the SA Addendum used the objectives and scoring criteria from the SA 2020.
- 2.13 The SA Addendum considered that monitoring of the Sustainability Indicators should be reviewed, in light of comments made by Natural England, and to better reflect the potential impact policies could make on sustainability indicators. No further recommendations were made.

3. Assessment of Policy

- 3.1 The appraisal process was guided by a scoring framework (Appendix 4). As set out above, Non Site-Specific policies were assessed against the Sustainability Objectives (Appendix 1) and Site-Specific policies were assessed against the Site Sustainability criteria (Appendix 2). Appendix 3 sets out the relationship between the two sets of Objectives.
- 3.2 The requirement for additional sites was reduced at the time the SA 2020 was being prepared, and this reduced requirement for sites is considered in the assessments of the policy relating to spatial distribution (LP01) and in the SA Addendum 2022.

Non Site-Specific Assessments

- 3.3 The SA 2020 considered a range of options for each policy proposed for the draft Local Plan. Policy options for the Local Plan Review were considered against adopted Plan policies, as well as a 'no policy' option. A summary of the 'Non Site-Specific assessments' for the preferred options in SA 2020 is set out in Figure 4 below, which is also used in the criteria illustrated in Appendix 1 and the scoring criteria in Appendix 3.

	Non Site Specific Policies Cumulative Scores																						
	SA Objective:																						
Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	Total +	Total -	Overall Effect
LHN	+/-	0	0	0	0	0	+	+/-	0	+/-	+	+	0	0	+	+	++	0	0	+	11	3	Likely Positive Effect +8
LP01	-	--	-	-	0	+	+	++	-	+	+	+	+	+	+	+	+	+	++	+	17	5	Likely Positive Effect +12
LP02	-	+	+	+/-	+	+	+	++	-	0	0	+/-	++	+	0	++	+	+	0	+	19	3	Likely Positive Effect +16
LP03	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect
LP04	+	0	0	0	+/-	+/-	+/-	+	+	0	0	0	+/-	+	0	-	0	0	0	+	9	5	Likely Positive Effect +5
LP05	0	++	0	++	0	0	0	++	++	++	++	+	0	++	++	0	+	0	0	0	18	0	Likely Positive Effect +18
LP06	+/-	+	+	+	+/-	+/-	+	++	++	++	++	++	0	++	+	+	0	+	+	+	24	3	Likely Positive Effect +21
LP07	+/-	0	0	0	+/-	0	0	0	+	0	0	0	0	0	0	++	0	0	++	++	9	2	Likely Positive Effect +7
LP08	+	+	0	0	0	0	0	++	++	++	0	0	0	0	++	0	0	+	0	+	12	0	Likely Positive Effect +12
LP09	+/-	0	0	0	++	0	++	++	++	0	0	++	++	0	0	+	0	0	0	++	16	1	Likely Positive Effect +15
LP10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0	0	++	++	6	0	Likely Positive Effect +6
LP11	0	0	0	0	0	0	+	+/-	+/-	0	0	++	0	0	+/-	0	0	0	+	+/-	8	4	Likely Positive Effect +4
LP12	--	+	0	+/-	0	+/-	0	0	+/-	0	0	+	0	0	++	++	0	0	++	0	11	5	Likely Positive Effect +6
LP13	--	+	0	+/-	0	+/-	0	0	+/-	0	0	+	0	0	++	++	0	0	++	0	11	5	Likely Positive Effect +6
LP14	0	0	0	0	0	0	0	+/-	+	+	0	+	0	0	0	+	0	0	0	0	5	1	Likely Positive Effect +4
LP15	+/-	0	0	+	+	+/-	+	+	0	0	++	0	0	+	++	0	0	++	+	++	16	2	Likely Positive Effect +14
LP16	+	+/-	++	++	++	++	++	+	0	+	+/-	+	0	+	+	0	+/-	+	++	++	24	3	Likely Positive Effect +21
LP17	0	0	0	0	0	0	0	++	0	0	++	++	0	0	0	0	0	0	0	0	6	0	Likely Positive Effect +6
LP18	0	+	+	+	+	+	+	++	++	+	++	+	0	+	+	0	0	0	0	0	16	0	Likely Positive Effect +16
LP19	0	0	+	++	++	+	++	0	0	++	+	+	0	+	+	0	0	+	0	0	15	0	Likely Positive Effect +15
LP20	0	0	+	++	++	+	++	0	0	++	+	+	0	+	+	0	0	+	0	0	15	0	Likely Positive Effect +15
LP21	0	0	0	0	0	++	++	++	+	0	0	+	+	+	0	0	+	0	0	0	11	0	Likely Positive Effect +11
LP22	0	0	0	0	0	0	0	+	0	0	0	+	0	++	++	0	0	+	0	0	7	0	Likely Positive Effect +7
LP23	++	0	++	+	+	0	0	++	++	0	++	++	0	++	++	++	0	+	0	+	22	0	Likely Positive Effect +22
LP24	0	0	0	+	+	+	++	+	+	+	0	0	0	0	0	0	0	0	0	0	8	0	Likely Positive Effect +8
LP25	0	0	0	0	0	0	0	++	0	0	++	+	0	0	0	0	0	0	0	+	6	0	Likely Positive Effect +6
LP26	+	0	+	+	+	0	+	+	+	0	+	++	0	++	0	+	0	0	++	+	16	0	Likely Positive Effect +16
LP27	++	0	++	+	+	0	0	++	++	0	++	++	0	++	++	++	0	+	0	+	22	0	Likely Positive Effect +22
LP28	0	0	0	0	0	0	0	0	0	0	0	+	0	0	+	++	++	++	+	0	9	0	Likely Positive Effect +9
LP29	0	0	0	0	0	0	0	0	0	0	0	+	0	0	+	++	++	+	0	0	7	0	Likely Positive Effect +7
LP30	0	0	0	0	0	0	0	0	0	0	0	++	0	0	+	++	++	++	+	0	10	0	Likely Positive Effect +10
LP31	-	0	0	0	0	+/-	+	+	0	0	0	0	0	0	+	0	0	0	+	+	6	2	Likely Positive Effect +4
LP32	0	+	0	0	0	0	+	++	0	-	0	0	+	+	0	+	+	0	++	++	13	0	Likely Positive Effect +13
LP33	0	0	0	0	+	0	++	+	+	0	0	0	0	0	0	0	+/-	0	0	0	6	1	Likely Positive Effect +5
LP34	++	+	0	0	0	0	+	++	++	0	0	+	++	0	0	0	++	0	++	++	18	0	Likely Positive Effect +18
LP35	0	0	0	0	0	0	+	++	+	+	0	0	+	0	0	+	0	0	0	0	7	0	Likely Positive Effect +7
LP36	0	0	0	0	0	0	+	+	0	-	0	+/-	++	++	0	++	0	++	+	0	14	2	Likely Positive Effect +12
LP37	0	0	0	0	0	+	++	++	++	0	0	+	+	++	++	+	0	++	+	0	17	0	Likely Positive Effect +17
LP38	--	+/-	+/-	+/-	+	+	+	+/-	+/-	0	+	+	+	++	++	+	+	0	+	++	20	7	Likely Positive Effect +23
LP39	--	+/-	+/-	+/-	+	+	+	+/-	+/-	0	+	+	+	++	++	+	+	+	++	++	22	7	Likely Positive Effect +22
LP40	-	0	0	+/-	0	-	+	+	0	0	+/-	0	0	+	++	0	+	++	++	++	15	4	Likely Positive Effect +11
LP41	+	0	0	+	0	+	0	+	0	0	0	0	0	0	++	++	+	0	+	++	12	0	Likely Positive Effect +12
E2.2	+	0	+	+	+/-	+/-	+/-	+	+	0	0	0	+/-	+	+	-	0	0	0	+	12	5	Likely Positive Effect +7
Total +	17	13	15	27	20	27	39	46	30	13	29	39	14	30	44	33	22	23	32	35	548		
Total-	17	5	3	7	3	8	3	4	7	1	3	1	2	0	1	2	2	0	0	1		70	
Overall Effect	Likely Neutral Effect	Likely Positive Effect +8	Likely Positive Effect +12	Likely Positive Effect +20	Likely Positive Effect +17	Likely Positive Effect +19	Likely Positive Effect +36	Likely Positive Effect +42	Likely Positive Effect +23	Likely Positive Effect +12	Likely Positive Effect +26	Likely Positive Effect +38	Likely Positive Effect +12	Likely Positive Effect +30	Likely Positive Effect +43	Likely Positive Effect +31	Likely Positive Effect +20	Likely Positive Effect +23	Likely Positive Effect +32	Likely Positive Effect +34		Likely Positive Effect +478	

Figure 4: Non site-specific policies cumulative scoring, SA 2020

Site-Specific Assessments

- 3.4 Potential allocations for development were considered against the criteria in Appendix 2. The options for spatial distribution of housing development were considered in the LP01 assessments and again in the SA Addendum.
- 3.5 Sites were considered individually and in combination within settlements or settlement areas. The aggregated assessments are summarised in SA 2020 as illustrated in Figure 5 below:

	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste	Climate Change	Totals
Positive (+)	108	90	16	11	57	4	35	12	6	10	47	+396
Negative (X)	0	4	0	95	45	1	0	1	1	23	0	-170
	108	86	16	-84	12	3	35	11	5	-13	47	+226

Figure 5: Aggregated site scores

- 3.6 The SA considered that the allocations do not constitute a significant proportion of the high-grade land in the Borough taken as a whole, and that in consequence the contribution of development to the sustainability of local communities and their services outweigh the relatively limited loss of best quality agricultural land.

Amendments to Policy Assessments in the SA Addendum

- 3.7 Only some of the changes made following the preparation of the SA 2020 and prior to submission of the LPR were fully re-appraised in the SA Addendum. Many of the amendments to the KLWNLPR are factual changes to background information and referenced updated supporting evidence. The reasons for re-appraisal are set out in Figure 3 of the SA Addendum 2022.
- 3.8 As set out in Section 3 of the SA Addendum 2022, the updated policy wording in most cases strengthened the original intentions of the Plan and increases the sustainability and likely positive impacts of the policy. The effect of an amendment was assessed to be broadly neutral where:

- 1) Policies were deleted or amended to reflect development taking place, or allocated in Neighbourhood Plans.
- 2) Text from policies was moved within the Plan.
- 3) Additional information was provided within the supporting text as no policy change has taken place.

Cumulative Impact

- 3.9 The SA 2020 considered the overall scores for the non site-specific policies and the site-specific policies. The SA acknowledges that plus and minus scores are not directly comparable in this way; however, it does give an overall picture of the potential impact on sustainability that the Plan Review could have. Overall, the impact of the changes within the SA Addendum is relatively neutral. Most of the amendments strengthen the existing assessment without changing the overall score attached to each objective within the policy appraisal.
- 3.10 The SA Addendum 2022 concluded that the cumulative impacts of the Plan as assessed in the SA 2020 were not significantly impacted by the amendments. The changes taken together increase the likely positive effects of the Plan.

4. Consultation

- 4.1 Section 3 of the Regulation 22 Statement of Community Involvement⁸ sets out when and how consultations were undertaken on the Sustainability Appraisal and Habitats Regulation Assessment.

Draft Sustainability Appraisal Scoping Report (2017)

- 4.2 A draft SA Scoping Report was published in advance of the “Call for Sites and Policy Consultation” (17th October – 28th November 2016) taking into account previous feedback from Natural England. The draft SA Scoping Report was subject to consultation with statutory consultees (Environment Agency, Natural England and Historic England), in accordance with the 2004 Regulations.

Draft Sustainability Appraisal Report (2019)

- 4.3 The initial SA Scoping Report was published in 2017, forming an integral part of the process for developing policies during 2017-18 for the Regulation 18 version of the Local Plan Review (February 2019). The draft SA report was published in early 2019, for consultation alongside the Local Plan Review (4th

⁸ https://www.west-norfolk.gov.uk/download/downloads/id/7099/a7_regulation_22_statement_of_consultation.pdf

March – 29th April 2019). A significant number of representations were received, both relating to the draft SA report and accompanying evidence base documents, such as the HELAA.

- 4.4 Following the draft Local Plan Review consultation, as draft amendments to the Plan were prepared, these were accompanied by an updated sustainability appraisal, presented to Local Plan Task Group (LPTG) Members to accompany the proposed amendments. The appraisal also provided a comparison to the Sustainability Appraisal carried out during the last review.

Final Sustainability Appraisal Reports (2020)

- 4.5 Feedback from consultation on the draft SA report was collated and updates to the SA Scoping Report and SA report were presented to the Local Plan Task Group). This informed the draft Local Plan, as the Plan/policies were finalised into a publication version (autumn 2020 – spring 2021).
- 4.6 The SA (and HRA) were prepared as an integral part of the plan-making process. Consultation feedback from specific consultation bodies was published alongside both reports at the appropriate stages.

5. Monitoring

- 5.1 The SEA Regulations require that monitoring is undertaken in relation to the significant effects of implementing the Plan in question. Indicators should relate to areas where the plan can have an effect, although monitoring may pick up impacts from outside sources. Appendix 1 of the SA Scoping Report sets out suggested indicators against baseline information. Following consultation through the preparation of the Local Plan review, a revised set of indicators has been prepared within the SA Addendum. These indicators relate directly to the Sustainability Objectives and the Monitoring Indicators in the Local Plan Review.
- 5.2 The indicators will be updated in response to any modifications to the Local Plan Review. The SEA Post-Adoption Statement will confirm any final changes and set out the regime for monitoring the effects of the Plan through the AMR and other mechanisms.

6. Conclusions and recommendations

- 6.1 As set out above, recommendations from the SA were incorporated into the draft Plan throughout the plan-making process. The SA 2020 (Section 1) concluded that the overall Plan would constitute a sustainable form of development. The Strategic Environmental Assessment (SEA) which formed part of the SA found that the site-specific policies would have an overall positive effect on the environment, as defined by the Directive.

- 6.2 The SA Addendum 2022 concluded that the amendments to the policies would increase sustainability of development within the Plan and result in additional likely positive effects overall. In particular, the tightening of criteria relating to project level Habitat Regulation Assessment increases the scoring in terms of the natural environment, climate change and human health. The proposed amendments will likely have minimal impact on the level of development anticipated in the SA 2020 and the scoring relating to the local economy, society and community, and infrastructure are also strengthened where the Plan provides additional protection for markets, digital infrastructure and types of social housing.
- 6.3 It is important to understand that the SA itself cannot singularly determine a particular direction for the Local Plan to take. The Local Plan fits in to a hierarchy of planning documents, and is therefore influenced by Government policy, that in some cases has also been subject to some form of SA. In addition, the Local Plan is guided by suite of evidence that sets out and takes into account matters such as the aspirational objectives of the Borough, balanced against the realism and viability of the Plan being delivered. It is also the case that public consultation has played a role in the proposed policies and allocations of sites.

7. Next Steps

- 7.1 The full set of SA documents were prepared in support of the examination into the BCKLWN Local Plan Review and follow Stage A to D of the preparation of the SA including Strategic Environmental Assessment. Any further amendments proposed through the examination process will be subject to further assessment and appraisal in relation to both individual policies and the cumulative impacts of the Plan (additional Stages C and D).
- 7.2 On adoption of the BCKLWN Local Plan Review, the Councils will publish the Post-Adoption Statement setting out how the SA and SEA process was undertaken. The Plan will then be monitored for its impact on the SA and SEA objective (Stage E).
- 7.3 All documentation relating to the BCKLWN Local Plan Examination, and the various stages of SA and SEA preparation can be accessed on the Council's website⁹.

⁹ https://www.west-norfolk.gov.uk/info/20079/planning_policy_and_local_plan/951/local_plan_review_2016-2036_examination

Appendix 1: SA 2020 Table 2.2 with updates from SA Addendum (highlighted)

Topics	Local Plan Review Sustainability Objectives	SEA Environmental Effect 'Issues'
Land and Water Resources	<p>1. Minimise the irreversible loss of undeveloped Greenfield land, agricultural (Best Most Versatile 1- 3) land and productive agricultural holdings</p> <p>2. Limit water consumption to levels supportable by natural processes and storage systems</p>	<ul style="list-style-type: none"> • Soil • Water • Material assets • Landscape
Biodiversity and Geodiversity	<p>3. Maintain, restore and enhance the natural environment and sites designated for biological and geological interest</p> <p>4. Maintain and enhance the range, functionality and connectivity of characteristic habitats and species</p>	<ul style="list-style-type: none"> • Biodiversity • Fauna • Flora • Soil • Water • Landscape
Landscape and Townscape	<p>5. Avoid damage to protected sites and historic buildings</p> <p>6. Maintain and enhance the diversity and distinctiveness of landscape and townscape character</p> <p>7. Create places, spaces and buildings that work well, wear well and look good</p>	<ul style="list-style-type: none"> • Material assets • Cultural heritage including architectural and archaeological heritage • Landscape
Climate Change and Pollution	<p>8. Reduce pollution and GHG emissions that affects the quality of land, air, water or soils in the Borough including: noise, light, vibrations. Mitigate GHG emissions by moving towards sustainable transport systems and reducing the reliance on fossil fuel-based vehicles.</p> <p>9. Minimise waste production, reduce the use of non-renewable energy sources and support the recycling of waste products</p> <p>10. Minimise vulnerability and provide resilience and adaptation to climate change, taking account of flood risk and coastal change</p>	<ul style="list-style-type: none"> • Soil • Water • Climatic factors • Material assets • Coastal erosion/ Flood risk • Energy • High GHG emissions • Design & quality • Transport

Topics	Local Plan Review Sustainability Objectives	SEA Environmental Effect 'Issues'
	11. New development should be designed to be better adapted to climate change and flood risk	
Healthy Communities	12. Maintain and enhance human health 13. Reduce and prevent crime, and reduce the fear of crime 14. Improve the quantity and quality of Green Infrastructure, publicly accessible open space, Public Rights of Way and access	<ul style="list-style-type: none"> • Population • Human health <p>(There are also links to Biodiversity, Flora and fauna, Soil and Water)</p>
Inclusive Communities	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	<ul style="list-style-type: none"> • Population
Economic Activity	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	<ul style="list-style-type: none"> • Population • Material assets

Appendix 2: Site Sustainability Factors

Objective	Site Sustainability Factor	Includes positive and negative anticipated results in terms of, for example:
A	Access to Services	Proximity to services; development providing supporting local services; availability of public transport to towns and such major service centres
B	Community and Social	Local community support for proposals; provision of community facilities; provision of housing, especially types/tenures/mixes that meet community needs; neighbourhood plan promoted development; development contributing to healthy lifestyles
C	Economy A: Business	Promotes economic development; creates supports employment
D	Economy B: Food Production	Use of higher or lower grade agricultural land; development that involves/supports food production
E	Flood Risk	Development of land at different levels of flood risk; development type sensitivities
F	Heritage	Conservation or enhancement of cultural heritage, including listed and other historic buildings, conservation areas and others of local distinction, archaeology, etc.
G	Highways and Transport	Relationship of development to transport networks, especially public transport; safety, free flow and efficiency of use of highway and other transport networks; transport infrastructure improvements and extensions; cycle and footway provision/availability for practical access and reduction of car use
H	Landscape and Amenity	Conservation and enhancement of designated Norfolk Coast Area of Outstanding Natural Beauty and other distinctive landscapes; protection and improvement of local amenity (including visual/aural/olfactory)
I	Natural Environment	Biodiversity and geodiversity
J	Infrastructure, Pollution and Waste	Provision, protection and best use of infrastructure; avoidance of waste and pollution
K	Climate Change ¹⁰	Quality of design of new development adapting to climate change/flood risk, avoidance of adding to higher GHG emissions and adding towards minimizing the vulnerability of climate change

¹⁰ K Climate Change was added following the updated Scoping report and first referred to in SA 2020.

Appendix 3: The Relationship between Site Sustainability Factors and The Local Plan Review Sustainability Objectives

Local Plan Review Sustainability Objectives		Site Sustainability Factor										
		A	B	C	D	E	F	G	H	I	J	K
		Access to services	Community and social	Economy A: Business	Economy B: Food production	Flood risk	Heritage	Highways and Transport	Landscape and Amenity	Natural Environment	Infrastructure, Pollution & Waste	Climate Change
1	Minimise the irreversible loss of undeveloped Greenfield land, agricultural (Best Most Versatile 1-3) land and productive agricultural holdings				Strong		Moderate		Strong	Strong		Moderate
2	Limit water consumption to levels supportable by natural processes and storage systems					Moderate				Strong	Strong	Moderate
3	Maintain, restore and enhance the natural environment and sites designated for biological and geological interest								Moderate	Strong		Moderate
4	Maintain and enhance the range, functionality and connectivity of characteristic habitats and species								Moderate	Strong		
5	Avoid damage to protected sites and historic buildings			Moderate			Strong		Moderate			
6	Maintain and enhance the diversity and distinctiveness of landscape and townscape character						Strong		Strong	Moderate		
7	Create places, spaces and buildings that work well, wear well and look good	Moderate	Moderate	Moderate		Moderate	Moderate	Moderate	Moderate		Moderate	Moderate
8	Reduce pollution and GHG emissions that affects the quality of land, air, water or soils in the Borough including: noise, light, vibrations. Mitigate GHG emissions by moving towards sustainable transport systems and reducing the reliance on fossil fuel-based vehicles	Moderate						Moderate / Strong	Strong	Strong	Strong	Strong

¹¹ Table 3b from the SA 2020.

¹¹ K Climate Change was added following the updated Scoping report and first referred to in SA 2020.

9	Minimise waste production, reduce the use of non-renewable energy sources and support the recycling of waste products	Moderate								Moderate	Strong	Strong
10	Minimise vulnerability and provide resilience and adaptation to climate change, taking account of flood risk and coastal change		Moderate	Moderate	Moderate	Strong		Moderate			Moderate	Strong
11	New development should be designed to be better adapted to climate change and flood risk		Moderate	Moderate		Strong			Moderate	Moderate	Moderate	Strong
12	Maintain and enhance human health		Strong									Moderate
13	Reduce and prevent crime, and reduce the fear of crime		Strong									
14	Improve the quantity and quality of Green Infrastructure, publicly accessible open space, Public Rights of Way and access	Strong	Strong						Strong			Strong
15	Improve the quality, range and accessibility of services and facilities (e.g. health, transport, education, training, leisure opportunities)	Strong		Moderate								Moderate
16	Redress inequalities related to age, gender, disability, race, faith, location and income	Strong	Strong									
17	Ensure all groups have access to decent, appropriate and affordable housing	Moderate	Strong						Strong			Moderate
18	Encourage and enable the active involvement of local people in community activities		Strong									Moderate
19	Help people gain access to satisfying work appropriate to their skills, potential and place of residence		Strong	Strong								
20	Improve the efficiency, competitiveness and adaptability of the local economy			Strong								

Appendix 4: SA 2020 Table 3c Scoring Criteria

Sustainability Impact Score	Site Sustainability Factor										
	Access to services	Community and social	Economy A: Business	Economy B: Food production	Flood risk	Heritage	Highways and Transport	Landscape and Amenity	Natural Environment	Infrastructure, Pollution & Waste	Climate Change
Highly Positive ++	Top scoring in assessment – good access to a wide range of services	Strong community support. The community benefits from the site i.e. housing/mixed communities/ equality/ facilities	Highly positive permanent contribution to the economy, jobs, business opportunities				Site would deliver better transport links for the community		Improves natural environment	Site is for local or national infrastructure	Strong emphasis on green design and proof of new development taking a strong lead in adapting and mitigating climatic impacts
Positive +	Mid scoring in assessment – good access to a range of services	Overall favourable community support or, if no comments received – the community benefits from the site i.e. housing/mixed communities/ equality/ facilities	Overall positive contribution to the economy, jobs, business opportunities	Grade 6 Urban / Previously developed land / Non-agricultural	Flood Zone 1	Proven to enhance heritage	Identifiable access, NCC Highways Authority preferred site(s) for settlement	Site will improve the landscape / townscape / amenity e.g. replacing an eyesore	Contributes to natural environment		Positive contribution to new development taking place on brownfield sites, implementing high quality/green design which will help reduce GHG emissions
Neutral O		No comments received. Site would deliver minimal benefits to the community	Site would deliver minimal/no real benefit to the economy	Grade 4 or 5		No heritage impact		Site is unlikely to have either an overall positive or overall negative on the landscape / townscape – it will fit in with surrounding development	No impact		Site would deliver minimal requirements on addressing climate change

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¹² K Climate Change was added following the updated Scoping report and first referred to in SA 2020.

Positive/ Negative +/-		Strong community objection but site could deliver benefits i.e. housing/mixed communities/equality/facilities		Part of the site Grade 4 or 5 and part of the site Grade 3	Part Flood Zone 1 and part Flood Zone 2 or 3						Strong community/political objection but the site shows a strong emphasis on green design and reducing climatic issues
Unknown ?		Unknown Impact	Unknown Impact	Unknown grade	Unknown zone	Unknown impact	Unknown if access can be achieved	Unknown Impact	Unknown Impact	Unknown Impact	Unknown impact on climate change and reducing the boroughs current emissions
Dependant on Implementation #	Development is of a scale that could deliver a greater range of service	Site details negotiable - may deliver some community benefits	Site details still negotiable, may deliver some employment mixed/uses			Within or immediately adjacent to Conservation Area	Site suitable subject to safe access etc.(NCC Highways Authority)	Potential negative impacts but this could mitigated through the design of the scheme	Potential negative impact which could be mitigated	Some minor issues identified but also solutions provided	Site details still negotiable. Potential positive or negative impact on reducing climatic impact within the borough
Negative X	Poor scoring in assessment – poor access to a range of services	Some community objection – the scheme delivers minimal benefits	Overall negative impact to the economy, jobs, business opportunities	Grade 3	Flood Zone 2		Inadequate footpath to the school/general y disliked by NCC Highways Authority	Site likely to have a negative impact on the landscape/ townscape/ Amenity	Likely negative impact on species/ biodiversity	Generally negative comments from infrastructure providers	Likely to have a negative impact on dropping the borough GHG emissions and contributing to reducing climate change issues such as flood risk
Highly Negative XX	No walking / cycling access to services	Strong community objection – the scheme will not deliver wider benefits to the community	Highly negative permanent contribution to the economy, jobs, business opportunities	Grade 1 or Grade 2	Flood one 3/ Tidal Hazard Zone	Irreversible loss of heritage asset or permanent negative impact on setting	Problems with access cannot be overcome	Site likely to have a significant impact on the landscape / townscape which is virtually impossible to avoid	Significant adverse impact on major designation	Significant constraints to delivery identified by infrastructure providers	Significant adverse impacts on climate change which will not contribute to adapting or mitigating GHG emissions. Flood risks issues or improving the boroughs sustainability