

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

Sustainability Appraisal (SA) Addendum

July 2022

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Appendix 1: SA 2020 Table 2.2, Table 3.3a and Table 3.3b

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1. Introduction

- 1.1 This Sustainability Appraisal (SA) Addendum was produced in June 2022 in support of the Borough Council of King's Lynn and West Norfolk Local Plan Review 2020. It should be read in conjunction with the SA Scoping Report (2017), Scoping Report update (2020) and the SA Incorporating Strategic Environmental Assessment (SEA) 2020¹.
- 1.2 The SA 2020 sets out the background and process undertaken to produce the Sustainability Appraisal including SEA and the methodology followed.

Purpose of this document and relationship to previous SA work

1.3 Following the preparation of the SA 2020, the Council undertook further amendments to the draft Local Plan document, reflecting updates to the evidence base, factual corrections, changes in regulations and consultation. This document considers the changes made in 2020 and 2021, in preparation for the submission of the King's Lynn and West Norfolk Local Plan Review 2020 (KLWNLPR 2020). The full text of these changes is available on the Council's website²,³.

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 2020. Figure 1 below sets out how this document sits 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 | SA Addendum 2022 |
|------------------|--|---|
| A Scoping | Setting the context and objectives, establishing the baseline, and deciding on the scope | The context and objectives have been reviewed following consultation responses, including comments from Natural England. |
| B Option Testing | Developing and refining options | 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. |

¹ <u>https://www.west-norfolk.gov.uk/info/20216/local plan review 2016 - 2036/882/proposed pre-submission local plan review documents</u>

² <u>https://www.west-norfolk.gov.uk/download/downloads/id/6625/local_plan_review_version_2-_july-dec_2020_amendments.pdf</u>

³ <u>https://www.west-norfolk.gov.uk/download/downloads/id/6624/local plan review version 2- january to may 2021 amendments update.pdf</u>

| Stage | Summary | SA Addendum 2022 |
|------------------|---|--|
| C Assessing Plan | Appraising the effects of the Plan | 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 | The Plan and the SA/SEA Report have been |
| | Report | 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 Council will publish a Post-Adoption |
| | | Statement on the adoption of the Local Plan |
| | | Review, confirming how the SEA process was |
| | | undertaken. Following adoption of the LPR, the |
| | | Council will monitor the impacts of the Plan |
| | | primarily through the Authority's Monitoring |
| | | Report (AMR). |

Updates to Scoping

2.2 A number of amendments to the objectives and scoring criteria were made by Natural England in correspondence received by the Council on 28th September 2021. Those amendments are considered in Figure 2 below.

Figure 2: Response to comments from Natural England in relation to SA Scoping 2020

| Comment from NE in relation to SA 2020 | Assessment in relation to SA 2020 and SA Addendum 2022 |
|---|---|
| Table 2.2 Healthy communities. We suggest the inclusion of biodiversity, flora, fauna, soil and water under Strategic Environmental Assessment environmental effect/issue as there is cross over in terms of GI, biodiversity and natural capital. | The original assessments within the SA 2020 have not been updated as GI, Biodiversity and Natural Capital were considered across the policies within the draft Plan. The wording has been added to revised Table 2.2 in Appendix 2 for clarity and this table was used to prepare the SA Addendum 2022. |
| Table 3.3b. Improve the quantity and quality of Green Infrastructure,publicly accessible open space, Public Rights of Way and access. Well-designed GI has the potential to enhance and create habitats, improving | Policies LP19, LP06 and LP22 were re-appraised in the SA Addendum 2022. The Appraisals can be found in Appendix 4. |

| biodiversity potentially having a positive effect on the natural environment. We recommend that the advice provided under Policies LP19, LP06 and LP22 are considered and the Sustainability Appraisal (SA) updated to reflect any changes. | |
|--|---|
| Table 3.3b Healthy Communities: the sustainability objective is to improve the quantity and quality of Green Infrastructure, publicly accessible open space, Public Rights of Way (PRoW) and access. We suggest adding the following objective: "avoids impacts on the quality and extent of existing recreational assets, such as formal or informal footpaths" | The amendments have been considered in relation to SA 2020. The original assessments within the SA 2020 have not been updated as impacts on footpaths including PRoW were considered across the policies within the draft Plan. |
| Table 3.3b Biodiversity and Geodiversity. There is a risk that in some situations, development on land of limited biodiversity value in its own right can lead to the creation of islands of biodiversity, permanently severed from other areas. We thus suggest adding "Ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced". | The amendments have been considered in relation to SA 2020 and the SA Addendum. The original assessments within the SA 2020 have not been updated as the connectivity of ecological networks is required for consideration within the NPPF 2021 though paragraph 179 (a) and (b) The SA and the KLWNLPR have considered these impacts. |
| Biodiversity Net Gain | The Council and NE signed a Statement of Common Ground (SoCG) in February 2022⁴, stating that NE was supportive of the Plan in that "Opportunities/ guidance re net gains for biodiversity and wider environmental gains" as well as: Vision/ spatial strategy to protect and enhance the natural environment, reduce carbon emissions and to ensure that growth is sustainable (e.g. by way of GI-RAMS) Presumption in favour of sustainable development Commitment to futureproof against challenges of climate change Protection to character and beauty of the countryside, diversity of landscape and wildlife. |
| Monitoring Indicators | The SoCG agreed that additional points, including monitoring, will be addressed through Additional Modifications (minor or grammatical |

⁴ A12 4 natural england socg final 24 02 22.pdf

| changes) and Main Modifications. Appendix 5 contains a set of updated |
|---|
| draft indicators relating to the Sustainability Objectives. These |
| recommendations will be considered in the preparation of the final |
| monitoring schedule for the LPR, and monitored through the AMR. |

- 2.3 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.
- 2.4 Where policies have been re-appraised, the SA Addendum has used the objectives and scoring criteria from the SA 2020. The objectives and scoring criteria are set out in Appendices 1 and 2. Individual scoring for each re-appraised policy is included in Appendix 3.

3. Assessment of policy amendments

3.1 Only some of the changes made have been fully re-appraised in the SA Addendum. Many of the amendments to the KLWNLPR 2020 made factual changes to background information and referenced updated supporting evidence. Figure 3 sets out the reasoning for re-appraisal, summarises the changes made at each stage and provides a high-level assessment of whether further appraisal was deemed necessary. Cells are coloured orange where policies were amended and where a further consideration was required. Cells are coloured green where it was considered that amendments were not material, and no further assessment was required. Cells are coloured grey where no changes were proposed. A combined assessment was carried out where a re-appraisal was required for 2020 and 2021.

| Policy/Reference | 2020 Changes | Need for re-appraisal | 2021 Changes | Need for re-appraisal | Assessment status |
|---------------------------|--------------|-----------------------|--|---|---|
| Spatial Portrait | No change | No | New clause 4.1.18 to give further detail with regard to the distribution of development | No – distribution of development has not changed so assessment remains the same. | No material change to SA 2020. |
| LP01: Spatial Strategy | No change | No | No change | No | An updated appraisal has been included in Section 3 and Appendix 4 to expand |

Figure 3: Screening amendments for re-appraisal

| Policy/Reference | 2020 Changes | Need for re-appraisal | 2021 Changes | Need for re-appraisal | Assessment status |
|--|--|--|--|---|---|
| | | | | | on the assessment in SA 2020. |
| LP02: Settlement Hierarchy | Factual changes including Ashenwick recategorized | No – minor change | No change | No further assessment | No material change to SA 2020. |
| LP03: Presumption in favour of Sustainable Development | No change | No | No change | No | No material change to SA 2020. |
| LPO4: Development Boundaries | Added bullet point to new policy LPXX- Housing for the elderly and specialist care | This change was assessed in SA 202 as Policy 29. | No change | No further assessment | No further assessment |
| LP05: Infrastructure Provision | Additional text to 4.5.11 to refer to collection and oversight mechanism for CIL | No – changes give information on procedure | Amended text to Policy LP05 Clause 3 with a new point 'n' | Yes – additional wording changes to policy | An updated appraisal can be found in Section 3 and Appendix 3. |
| LP06: Climate Change | Strengthening of policy text in support of climate change statements, additional supporting text | Yes- changes to policy text. | Updated to reflect Building Regulations | No – policy wording doesn't impact outcome | An updated appraisal can be found in Section 3 and Appendix 3. |
| LP07: The economy | Additional clause (g) affords additional protection of amenity | Yes- changes to policy text. | Arising from the HRA LP07 (The Economy) supporting text could highlight risks from tourism growth for European sites in relation to recreation. Any tourism growth will need to comply with LP27 | Yes – additional wording changes to policy | An updated appraisal can be found in Section 3 and Appendix 3. |

| Policy/Reference | 2020 Changes | Need for re-appraisal | 2021 Changes | Need for re-appraisal | Assessment status |
|--|--------------|-----------------------|--|--|--|
| | | | (assuming generic wording inserted). | | |
| LP08: Retail development | No change | No | No change | No further assessment | No material change to SA 2020. |
| LP09: Touring and Permanent Holiday Sites | No change | No | Arising from the HRA LP09 wording could be modified for accuracy as project level HRA will not be relevant for proposals with risks to SSSIs that are outside European sites. | No – changes reflect legal protections for designated sites. | Amendment suggested does not change level of protection for designated sites as project level HRA would not be undertaken for SSSI. No further assessment undertaken. No material change to SA 2020. |
| LP10: Development associated with the National Construction College site, Bircham Newton (CITB), British Sugar Factory, Wissington and RAF Marham Policy | No change | No | Factual changes | No further assessment | No material change to SA 2020. |
| LP11: Strategic and Major Road Network Policy | No change | No | No change | No further assessment | No material change to SA 2020. |

| Policy/Reference | 2020 Changes | Need for re-appraisal | 2021 Changes | Need for re-appraisal | Assessment status |
|--|--|------------------------------------|--|---|---|
| LP12: Disused Railway Trackways Policy | No change | No | No change | No further assessment | No material change to SA 2020. |
| LP13: Transportation Policy | No change | No | No change | No further assessment | No material change to SA 2020. |
| LP14: Parking Provision in New Development | Additional supporting text to provide reference to the NPPF. | No – no changes to policy. | No change | No further assessment | No material change to SA 2020. |
| LP15: Coastal Areas Policy | No change | No | No change | No further assessment | No material change to SA 2020. |
| LP16: New LP16 Norfolk Coast AONB Policy | No change | No | No change | No further assessment | No material change to SA 2020. |
| LP17: Coastal Change Management Area (Hunstanton to Dersingham) Policy | Changes to supporting text and Glossary. Removal of the word 'material' in policy wording and addition of Clause 3 to policy. | Yes – changes to policy wording | No change | No further assessment | An updated appraisal can be found in Section 3 and Appendix 3. |
| LP18: Design and Sustainable Development | Policy wording change from 'should' to 'must'. | Yes – changes to policy wording | No change | No further assessment | An updated appraisal can be found in Section 3 and Appendix 3. |
| LP19: Environmental Assets - Green Infrastructure, Landscape Character, Biodiversity and Geodiversity | Amendments to supporting text. Change of policy wording from 'should' to 'must'. | Yes – changes to policy wording | From the HRA - Policy wording for Breckland SPA moved from LP19 to LP27 | No – the plan still includes the relevant wording. No further assessment. | An updated appraisal can be found in Section 3 and Appendix 3. |

| Policy/Reference | 2020 Changes | Need for re-appraisal | 2021 Changes | Need for re-appraisal | Assessment status |
|--|--|------------------------------------|---|--|---|
| LP20: Environmental Assets – Historic Environment | Additional supporting text to provide reference to the NPPF. | No – no changes to policy. | No change | No further assessment | No material change to SA 2020. |
| LP21: Environment, Design and Amenity | Amendments to supporting text and additional policy clause in support of the provision of on-site open space. | Yes – changes to policy wording | No change | No further assessment | An updated appraisal can be found in Section 3 and Appendix 3. |
| LP22: Provision of Recreational Open Space for Residential Developments | Amendments to supporting text and additional text for policy clauses 1 and 5. | Yes – changes to policy wording | No change | No further assessment | An updated appraisal can be found in Section 3 and Appendix 3. |
| LP23: Green Infrastructure | No change | No | No change | No further assessment | No material change to SA 2020. |
| LP24: Renewable Energy | Addition of 'locally' within policy. | Yes – changes to policy wording | Policy text amended to cross-reference to LP27 and accurately set out legal protection and HRA process for designated sites. | Yes – additional wording changes policy | An updated appraisal can be found in Section 3 and Appendix 3. |
| LP25: Sites in Areas of Flood Risk | Addition of 'locally' within policy. | Yes – changes to policy wording | No change | No further assessment | An updated appraisal can be found in Section 3 and Appendix 3. |
| LP26: Protection of Open Space | Changes to supporting text only. | No. | No change | No further assessment | No material change to SA 2020. |
| LP27: Habitats Regulation Assessment | No change | No | Policy and supporting text amendments to ensure high level protection for European | Yes – additional wording changes policy | An updated appraisal can be found in Section 3 and Appendix 3. |

| Policy/Reference | 2020 Changes | Need for re-appraisal | 2021 Changes | Need for re-appraisal | Assessment status |
|---|---|---------------------------------------|---|-----------------------|--------------------------------|
| | | | Sites against the impacts of recreation and air quality. Amendments have been made to reflect changes recommended. | | |
| LP28: Affordable Housing | Changes to policy wording to define small scale as between one and five dwellings. | No – no material change to policy. | No change | No further assessment | No material change to SA 2020. |
| LP29: Housing for the elderly and specialist care | No change | No | No change | No | No material change to SA 2020. |
| LP30: Adaptable & Accessible Homes | No change | No | No change | No | No material change to SA 2020. |
| LP31: Residential Development Reasonably Related to Existing Settlements Policy | No change | No | No change | No | No material change to SA 2020. |
| LP32: Houses in Multiple Occupation Policy | No change | No | No change | No | No material change to SA 2020. |
| LP33: Enlargement or Replacement Dwellings in the Countryside Policy | No change | No | No change | No | No material change to SA 2020. |
| LP34: Housing Needs of Rural Workers Policy | No change | No | No change | No | No material change to SA 2020. |

| Policy/Reference | 2020 Changes | Need for re-appraisal | 2021 Changes | Need for re-appraisal | Assessment status |
|--|--|---|--|--|---|
| LP35: Residential Annexes Policy | No change | No | No change | No | No material change to SA 2020. |
| LP36: Community and Culture | Additional policy text to reference other strategies. | No – no material change to policy. | No change | No further assessment | No material change to SA 2020. |
| 9.2 Kings Lynn | Changes to supporting text only. | No | No change | No further assessment | No material change to SA 2020. |
| E1.1 King's Lynn Town Centre | Additional text within policy to reference Use Classes. | No – no material change to policy. | Amended text to clause c- "Markets will be supported and enhanced". | Yes – additional wording changes policy | An updated appraisal can be found in Section 3 and Appendix 3. |
| E1.2- Town Centre retail expansion area Policy | Deletion of policy | No – deletion was assessed in SA 2020. | No change | No further assessment | No material change to SA 2020. |
| E1.2a: King's Lynn Port Policy | No change | No | No change | No | No material change to SA 2020. |
| E1.3: Gaywood Clock Area | Amendments to refer to updated Use Classes. Supporting text amendments. Additional clause 3 relating to sustainable transport. | Yes – change to policy wording | No change | No further assessment | An updated appraisal can be found in Section 3 and Appendix 3. |
| E1.KLR: King's Lynn Riverfront Regeneration Area Policy | No change | No | No change | No | No material change to SA 2020. |
| E1.5: King's Lynn, Boal Quay | Change policy wording to 'up to' 50 dwellings | Yes – change to policy wording | No change | No further assessment | An updated appraisal can be found in Section 3 and Appendix 3. |

| Policy/Reference | 2020 Changes | Need for re-appraisal | 2021 Changes | Need for re-appraisal | Assessment status |
|---|---|-------------------------------------|--------------|-----------------------|---|
| E1.6 King's Lynn, South of Parkway | No change | No | No change | No | No material change to SA 2020. |
| E1.7 King's Lynn, Land at Lynnsport | No change | No | No change | No | No material change to SA 2020. |
| E1.8 King's Lynn, South Quay | Addition to policy wording "Land amounting to 0.5 hectare is allocated for mixed use including residential development for at least 50 dwellings." | Yes – change to policy wording | No change | No further assessment | An updated appraisal can be found in Section 3 and Appendix 3. |
| E1.9 King's Lynn, Land west of Columbia Way | No change | No | No change | No | No material change to SA 2020. |
| E1.10 King's Lynn, North of Wisbech Road | No change | No | No change | No | No material change to SA 2020. |
| E1.11 King's Lynn, Southgates | No change | No | No change | No | No material change to SA 2020. |
| E1.12 King's Lynn Employment Land | No change | No | No change | No | No material change to SA 2020. |
| E1.13 Green Infrastructure | Amendment to map and supporting text. | No – no material change. | No change | No further assessment | No material change to SA 2020. |
| 9.3 West Lynn and E1.14 West Lynn Housing | No change | No | No change | No | No material change to SA 2020. |
| E1.15 West Lynn Housing, Land at Bankside | Addition of reference to cycle parking. | Yes – additional policy wording. | No change | No further assessment | An updated appraisal can be found in Section 3 and Appendix 3. |

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| Policy/Reference | 2020 Changes | Need for re-appraisal | 2021 Changes | Need for re-appraisal | Assessment status |
|--|--|--|--|--|---|
| 9.4 West Winch | Combination of 6a and 6b to simplify text. Additional clause referencing SPD. | No – amendments to policy wording are for clarity and the SPD provides additional detail | Amendment and detail has been added to the supporting text. | No – minor changes | No material change to SA 2020. |
| E2.1/E2.2 West Winch Strategic Growth Area | No change | No | Textual amendments made to Part A Clause 1 | Yes – additional wording changes policy | An updated appraisal can be found in Section 3 and Appendix 3. |
| E3.1 South Wooton | No change | No | Policy and supporting text amendments in respect to supporting habitats and project level assessments. | Yes – additional wording changes policy | An updated appraisal can be found in Section 3 and Appendix 3. |
| F1.1 Downham Market Town Centre | Addition to update Use Class references. | No - no material change to policy. | Amended text to clause (c) Additional support for markets | Yes – additional wording changes policy | An updated appraisal can be found in Section 3 and Appendix 3. |
| F2.1 Hunstanton Town Centre and Retailing | Addition to update Use Class references. | No - no material change to policy. | Amended text to Clause 5 Additional support for markets | Yes – additional wording changes policy | An updated appraisal can be found in Section 3 and Appendix 3. |
| F2.3 Hunstanton Housing | No change | No | Policy and supporting text amendments in respect to supporting habitats and project level assessments | Yes – additional wording changes policy | An updated appraisal can be found in Section 3 and Appendix 3. |
| East Rudham | Addition to description only. | No | No change | No further assessment | No material change to SA 2020. |

| Policy/Reference | 2020 Changes | Need for re-appraisal | 2021 Changes | Need for re-appraisal | Assessment status |
|--|---|--|-----------------|-----------------------|--|
| Terrington St Clements 12.9.4 TSC1 | Change to map and supporting text. | No – no material change. | No change | No further assessment | No material change to SA 2020. |
| Upwell Section | Change to reflect allocations within the NDP. | Yes – additional dwellings provided in allocation. | No change | No further assessment | No impact on the assessment within SA 2020. The changes in the KLWN Local Plan Review 2020 reflect the updated Neighbourhood Development Plan. |
| Three Holes | Change to reflect allocations within the NDP. | Yes – additional dwellings provided in allocation. | No change | No further assessment | No material changes to assessment in SA 2020. The additional allocation will come forward under the policies of the KLWN Local Plan Review 2020 and the SA of these changes is considered to be neutral. |
| Great Bircham | Change to description. | No – amendment to description only. | Factual changes | No | No material change to SA 2020. |
| Hillington | Change to description. | No – amendment to description only. | No change | No further assessment | No material change to SA 2020. |
| Syderstone | Change to description. | No – amendment to description only. | No change | No further assessment | No material change to SA 2020. |
| SVAH | Change to reflect allocations within the NDP. | No – no material change. | No change | No further assessment | No material change to SA 2020. |

| Policy/Reference | 2020 Changes | Need for re-appraisal | 2021 Changes | Need for re-appraisal | Assessment status |
|----------------------|--------------|-----------------------|----------------------------|--------------------------|----------------------|
| C20.1 (Dersingham | No change | No | Site specific policy | Voc. additional wording | An undated appraisal |
| G29.1 (Dersingham - | No change | NO | Site-specific policy | Yes – additional wording | An updated appraisal |
| Land north of | | | wording for G29.1 | changes policy | can be found in |
| Doddshill Road) | | | identifies the need for | | Section 3 and |
| | | | project level Habitats | | Appendix 3. |
| | | | Regulation Assessment | | |
| G29.2 (Dersingham - | No change | No | Site-specific policy | Yes – additional wording | An updated appraisal |
| Land at Manor Road) | - | | wording for G29.2 | changes policy | can be found in |
| , | | | (Dersingham - Land at | U I I | Section 3 and |
| | | | Manor Road) identifies | | Appendix 3. |
| | | | the need for project level | | |
| | | | Habitats Regulation | | |
| | | | Assessment. | | |
| C11 2 (Crimaton and | No oborozo | No | | Vec. edditionel wording | |
| G41.2 (Grimston and | No change | No | Site-specific policy | Yes – additional wording | An updated appraisal |
| Pott Row - Land | | | wording for G41.2 | changes policy | can be found in |
| adjacent Stave Farm, | | | (Grimston and Pott Row - | | Section 3 and |
| west of Ashwicken | | | Land adjacent Stave | | Appendix 3. |
| Road) | | | Farm, west of Ashwicken | | |
| | | | Road identifies the need | | |
| | | | for project level Habitats | | |
| | | | Regulation Assessment | | |

4. Appraisal of material changes

- 4.1 Where it was deemed necessary to re-appraise policies in light of the changes made, an updated assessment was undertaken against the updated objectives. The scoring system has not changed from the SA 2020 and is provided in Appendix 2. Figure 4 below gives a summary of the updated appraisals, which can be found in further detail in Appendix 3.
- 4.2 As set out in the summary appraisal, the updated policy wording, in most cases, strengthens 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 Development Plans;

2) text from policies was moved within the Plan; and/or

3) additional information was provided within the supporting text as no policy change has taken place.

Figure 4: Summary Appraisal of material changes to policies

| Policy/Reference | 2020 Changes | Need for re- appraisal | 2021 Changes | Need for re- appraisal | Assessment Status | Summary of 2022 Appraisal |
|--------------------------------------|--|--|---|---|--|--|
| LP01: Spatial Strategy | No change | No | No change | No | An updated appraisal has been included in Section 3 and Appendix 4 to expand on the assessment in SA 2020. | The policy options for LP01 have been re- appraised in Appendix 4, setting out how 'Option 7 Local Plan Review' compares to the original options assessed in SA 2020. There is no change to the outcome of the appraisal. |
| LP05: Infrastructure Provision | Additional text to 4.5.11 to refer to collection and oversight mechanism for CIL | No – changes give information on procedure | Amended text to Policy LP05 Clause 3 with a new point 'n' | Yes – additional wording changes to policy | An updated appraisal can be found in Section 3 and Appendix 3. | The additional reference strengthens support for digital infrastructure and the economy. This is likely to increase the positive effect of the Plan as reflected in the updated appraisal (+1). |
| LP06: Climate Change | Strengthening of policy text in support of climate change statements, | Yes- changes to policy text. | Updated to reflect Building Regulations | No – policy wording does not impact outcome | An updated appraisal can be found in Section 3 | The policy changes strengthen the original policy intentions and wording. The overall scoring has not increased |

| Policy/Reference | 2020 Changes | Need for re- appraisal | 2021 Changes | Need for re- appraisal | Assessment Status | Summary of 2022 Appraisal |
|---|--|------------------------------|---|--|---|---|
| | additional supporting text | | | | and Appendix 3. | as policy already scores ++ for criteria related to climate change. |
| LP07: The economy | Additional clause (g) affords additional protection of amenity | Yes- changes to policy text. | Arising from the HRA LP07 (The Economy) supporting text could highlight risks from tourism growth for European sites in relation to recreation. Any tourism growth will need to comply with LP27 (assuming generic wording inserted). | Yes – additional wording changes to policy | An updated appraisal can be found in Section 3 and Appendix 3. | The updated policy strengthens the original policy intentions and wording to provide additional protection of amenity and protection for designated assets. Additional positive scoring of 4. |
| LP09: Touring and Permanent Holiday Sites | No change | No | HRA updates to LP09 (Touring and Permanent Holiday Sites Policy): wording could be modified for accuracy as project level HRA will not be relevant for proposals with risks to SSSIs that are outside European sites. | No – changes reflect legal protections for designated sites. | Amendment suggested does not change level of protection for designated sites as project level HRA would not be undertaken for SSSI. No | N/A |

| Policy/Reference | 2020 Changes | Need for re- appraisal | 2021 Changes | Need for re- appraisal | Assessment Status | Summary of 2022 Appraisal |
|--|--|------------------------------------|--|---|--|--|
| | | | | | further assessment undertaken. | |
| LP17: Coastal Change Management Area (Hunstanton to Dersingham) Policy | Changes to supporting text and Glossary. Removal of the word 'material' in policy wording and addition of Clause 3 to policy. | Yes – changes to policy wording | No change | No further assessment | An updated appraisal can be found in Section 3 and Appendix 3. | Changes to policy wording strengthen the provisions of the policy and the likely positive effects of the Plan, but the impact is not significant on the appraisal criteria. No change to overall scoring. |
| LP18: Design and Sustainable Development | Policy wording change from 'should' to 'must'. | Yes – changes to policy wording | No change | No further assessment | An updated appraisal can be found in Section 3 and Appendix 3. | Changes to policy wording strengthen the provisions of the policy and the likely positive effects of the Plan, but the impact is not significant on the appraisal criteria. No change to overall scoring. |
| LP19: Environmental Assets - Green Infrastructure, Landscape Character, Biodiversity and Geodiversity | Amendments to supporting text. Change of policy wording from 'should' to 'must'. | Yes – changes to policy wording | From the HRA - Policy wording for Breckland SPA moved from LP19 to LP27 | No – the plan still includes the relevant wording. No further assessment. | An updated appraisal can be found in Section 3 and Appendix 3. | Changes to policy wording strengthen the provisions of the policy and the likely positive effects of the Plan, but the impact is not significant on the appraisal criteria. No change to overall scoring. |
| LP21: Environment, Design and Amenity | Amendments to supporting text and additional policy | Yes – changes to policy wording | No change | No further assessment | An updated appraisal can be | Changes to policy wording strengthen the provisions of the policy and the likely |

| Policy/Reference | 2020 Changes | Need for re- appraisal | 2021 Changes | Need for re- appraisal | Assessment Status | Summary of 2022 Appraisal |
|---|---|------------------------------------|--|---|---|--|
| | clause in support of the provision of on- site open space. | | | | found in Section 3 and Appendix 3. | positive effects of the Plan, but the impact is not significant on the appraisal criteria. No change to overall scoring. |
| LP22: Provision of Recreational Open Space for Residential Developments | Amendments to supporting text and additional text for policy clauses 1 and 5. | Yes – changes to policy wording | No change | No further assessment | An updated appraisal can be found in Appendix 4 | Changes to policy wording strengthen the provisions of the policy and the likely positive effects of the Plan, as reflected in additional positive scoring in relation to designated assets. |
| LP24: Renewable Energy | Addition of 'locally' within policy. | Yes – changes to policy wording | Policy text amended to cross-reference to LP27 and accurately set out legal protection and HRA process for designated sites. | Yes – additional wording changes policy | An updated appraisal can be found in Appendix 4 | Changes to policy wording strengthen the provisions of the policy and the likely positive effects of the Plan, as reflected in additional positive scoring in relation to flood resilience. |
| LP25: Sites in Areas of Flood Risk | Addition of 'locally' within policy. | Yes – changes to policy wording | No change | No further assessment | An updated appraisal can be found in Appendix 4 | Changes to policy wording strengthen the provisions of the policy and the likely positive effects of the Plan, but the impact is not significant on the appraisal criteria. No change to overall scoring. |

| Policy/Reference | 2020 Changes | Need for re- appraisal | 2021 Changes | Need for re- appraisal | Assessment Status | Summary of 2022 Appraisal |
|--|--|---------------------------------------|---|---|--|--|
| LP27: Habitats Regulation Assessment | No change | No | Policy and supporting text amendments to ensure high level protection for European Sites against the impacts of recreation and air quality. Amendments have been made to reflect changes recommended. | Yes – additional wording changes policy | An updated appraisal can be found in Appendix 4 | Changes to policy wording strengthen the provisions of the policy and the likely positive effects of the Plan, as reflected in the additional positive scoring in relation to designated assets. |
| E1.1 King's Lynn Town Centre | Additional text within policy to reference Use Classes. | No – no material change to policy. | Amended text to clause c- "Markets will be supported and enhanced". | Yes – additional wording changes policy | An updated appraisal can be found in Appendix 4 | Changes to policy wording strengthen the provisions of the policy and the likely positive effects of the Plan but the impact is not significant on the appraisal criteria. No change to overall scoring. |
| E1.3 Gaywood Clock Area | Amendments to refer to updated Use Classes. Supporting text amendments. Additional clause 3 relating to sustainable transport. | Yes – change to policy wording | No change | No further assessment | An updated appraisal can be found in Section 3 and Appendix 3. | Changes to policy wording strengthen the provisions of the policy and the likely positive effects of the Plan, but the impact is not significant on the appraisal criteria. No change to overall scoring. |

| Policy/Reference | 2020 Changes | Need for re- appraisal | 2021 Changes | Need for re- appraisal | Assessment Status | Summary of 2022 Appraisal |
|--|--|-------------------------------------|--|---|--|--|
| E1.5 King's Lynn, Boal Quay | Change policy wording to 'up to' 50 dwellings | Yes – change to policy wording | No change | No further assessment | An updated appraisal can be found in Section 3 and Appendix 3. | Changes to policy wording strengthen the provisions of the policy and the likely positive effects of the Plan, but the impact is not significant on the appraisal criteria. No change to overall scoring. |
| E1.8 King's Lynn, South Quay | Addition to policy wording "Land amounting to 0.5 hectare is allocated for mixed use including residential development for at least 50 dwellings." | Yes – change to policy wording | No change | No further assessment | An updated appraisal can be found in Section 3 and Appendix 3. | No meaningful change to the SA 2020 appraisal. |
| E1.15 Land at Bankside | Addition of reference to cycle parking. | Yes – additional policy wording. | No change | No further assessment | An updated appraisal can be found in Section 3 and Appendix 3. | No significant change to the SA 2020 appraisal. |
| E2.1/E2.2 West Winch Strategic Growth Area | No change | No | Textual amendments made to Part A Clause 1 | Yes – additional wording changes policy | An updated appraisal can be found in Section 3 | Changes to policy wording strengthen the provisions of the policy and the likely positive effects of the Plan, but the impact is not significant on the |

| Policy/Reference | 2020 Changes | Need for re- appraisal | 2021 Changes | Need for re- appraisal | Assessment Status | Summary of 2022 Appraisal |
|---|--|---------------------------------------|--|---|--|---|
| | | | | | and Appendix 3. | appraisal criteria. No change to overall scoring. |
| E3.1 South Wooton | No change | Νο | Policy and supporting text amendments in respect to supporting habitats and project level assessments. | Yes – additional wording changes policy | An updated appraisal can be found in Section 3 and Appendix 3. | The changes provide additional protection for designated sites but may place limits on development. The impact is not significant on the appraisal criteria. No change to overall scoring. |
| F1.1 Downham Market Town Centre | Addition to update Use Class references. | No - no material change to policy. | Amended text to clause (c) Additional support for markets | Yes – additional wording changes policy | An updated appraisal can be found in Section 3 and Appendix 3. | Changes to policy wording strengthen support for markets and the likely positive effects of the Plan. The impact is not significant on the appraisal criteria. No change to overall scoring. |
| F2.1 Hunstanton Town Centre and Retailing | Addition to update Use Class references. | No - no material change to policy. | Amended text to Clause 5 Additional support for markets | Yes – additional wording changes policy | An updated appraisal can be found in Section 3 and Appendix 3. | Changes to policy wording strengthen support for markets and the likely positive effects of the Plan. The impact is not significant on the appraisal criteria. No change to overall scoring. |
| F2.3 Hunstanton Housing | No change | No | Policy and supporting text amendments in respect to supporting | Yes – additional wording changes policy | An updated appraisal can be found in | The changes provide additional protection for designated sites but may place limits on |

| Policy/Reference | 2020 Changes | Need for re- appraisal | 2021 Changes | Need for re- appraisal | Assessment Status | Summary of 2022 Appraisal |
|--|--------------|---------------------------|--|---|--|---|
| | | | habitats and project level assessments | | Section 3 and Appendix 3. | development. The impact is not significant on the appraisal criteria. No change to overall scoring. |
| G29.1 (Dersingham - Land north of Doddshill Road) | No change | No | Site-specific policy wording for G29.1 identifies the need for project level Habitats Regulation Assessment | Yes – additional wording changes policy | An updated appraisal can be found in Section 3 and Appendix 3. | The changes provide additional protection for designated sites but may place limits on development. The overall change to the SA of the policy is positive. |
| G29.2 (Dersingham - Land at Manor Road) | No change | No | Site-specific policy wording for G29.2 (Dersingham - Land at Manor Road) identifies the need for project level Habitats Regulation Assessment. | Yes – additional wording changes policy | An updated appraisal can be found in Section 3 and Appendix 3. | The changes provide additional protection for designated sites but may place limits on development. The overall change to the SA of the policy is positive. |
| G41.2 (Grimston and Pott Row - Land adjacent Stave Farm, west of Ashwicken Road) | No change | Νο | Site-specific policy wording for G41.2 (Grimston and Pott Row - Land adjacent Stave Farm, west of Ashwicken Road identifies the need for project level Habitats Regulation Assessment | Yes – additional wording changes policy | An updated appraisal can be found in Section 3 and Appendix 3. | The changes provide additional protection for designated sites but may place limits on development. The overall change to the SA of the policy is positive. |

5. Cumulative impacts

- 5.1 The SA 2020 (Section 3 Results of the SA) concluded that the site-specific and non-site-specific policies within the Plan would overall have a positive impact on sustainability.
- 5.2 The amendments⁵ refer to two policy deletions (E1.2 and E1.4). These deletions were assessed in the SA 2020 and no further assessment was required.
- 5.3 The positive scores for the re-appraised policies increased by 7 points. The negative impacts of the proposed amendments decreased by 1. Overall, the impact of the changes is relatively neutral. Most of the amendments strengthen the existing assessment without changing the overall score attached to each objective within the policy appraisal.

| | SA 2020 | Change - SA Addendum 2022 | Updated Score |
|--------------------------|---------|---------------------------|---------------|
| Policies - positive | 548 | Additional 7 positive | 548+7=555 |
| Policies - negative | -70 | 1 less negative | -69 |
| Total | 478 | | 486 |
| Site Specific - positive | 396 | No change | n/a |
| Site Specific - negative | -170 | No change | n/a |
| Total | 226 | | 226 |

Figure 5: Summary of updated scores

5.4 The SA Addendum 2022 considers that the cumulative impacts of the Plan as assessed in the SA 2020 are not significantly impacted by the amendments. The changes taken together increase the likely positive effects of the Plan.

6. Conclusions and recommendations

6.1 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.

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⁵ <u>https://www.west-norfolk.gov.uk/download/downloads/id/6625/local_plan_review_version_2-_july-dec_2020_amendments.pdf</u> <u>https://www.west-norfolk.gov.uk/download/downloads/id/6624/local_plan_review_version_2-_january_to_may_2021_amendments_update.pdf</u>

6.2 The SA Addendum 2022 concludes 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 impacts 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.

7. Next Steps

- 7.1 The SA Addendum has been prepared in support of the examination into the BCKLWN Local Plan Review and follows 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 Council 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 website⁶.

⁶ 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, Table 3.3a and Table 3.3b

Updated Table 2.2 Local Plan Review Sustainability Objectives

| Topics | Local Plan Review Sustainability Objectives | SEA Environmental Effect 'Issues' |
|--------------------------|---|---|
| Land and Water Resources | 1. Minimise the irreversible loss of undeveloped Greenfield land, agricultural (Best | • Soil |
| | Most Versatile 1-3) land and productive agricultural holdings | • Water |
| | | Material assets |
| | 2. Limit water consumption to levels supportable by natural processes and storage systems | Landscape |
| Biodiversity and | 3. Maintain, restore and enhance the natural environment and sites designated for | Biodiversity |
| Geodiversity | biological and geological interest | • Fauna |
| | | • Flora |
| | 4. Maintain and enhance the range, functionality and connectivity of characteristic | • Soil |
| | habitats and species | • Water |
| | | Landscape |
| Landscape and Townscape | 5. Avoid damage to protected sites and historic buildings | Material assets |
| | | Cultural heritage including |
| | 6. Maintain and enhance the diversity and distinctiveness of landscape and townscape | architectural and archaeological |
| | character | heritage |
| | | Landscape |
| | 7. Create places, spaces and buildings that work well, wear well and look good | |
| Climate Change and | 8. Reduce pollution and GHG emissions that affects the quality of land, air, water or | • Soil |
| Pollution | soils in the Borough including: noise, light, vibrations. Mitigate GHG emissions by | • Water |
| | moving towards sustainable transport systems and reducing the reliance on fossil | Climatic factors |
| | fuel-based vehicles. | Material assets |
| | | Coastal erosion/ Flood risk |
| | 9. Minimise waste production, reduce the use of non-renewable energy sources and | • Energy |
| | support the recycling of waste products | High GHG emissions |
| | 10. Minimise vulnerability and provide resilience and adaptation to climate change, taking account of flood risk and coastal change | 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 | PopulationHuman health |
| | 13. Reduce and prevent crime, and reduce the fear of crime | (There are also links to Biodiversity, Flora and fauna, Soil |
| | 14. Improve the quantity and quality of Green Infrastructure, publicly accessible open space, Public Rights of Way and access | and Water) |
| Inclusive Communities | 15. Improve the quality, range and accessibility of services and facilities (e.g. health, transport, education, training, leisure opportunities) | Population |
| | 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 | |
| Economic Activity | 19. Help people gain access to satisfying work appropriate to their skills, potential and place of residence | PopulationMaterial assets |
| | 20. Improve the efficiency, competitiveness and adaptability of the local economy | |

Table 3.3a Site Sustainability Factors – no updates

| Objective | Site Sustainability Factor | Includes positive and negative anticipated results in terms of, for example: |
|-----------|-------------------------------------|---|
| Α | Access to Services | Proximity to services; development providing supporting local services; availability of public transport to |
| | | towns and such major service centres |
| В | 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 |
| С | 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 |
| Н | 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 |
| К | Climate Change | 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 |

Table 3.3b – The Relationship between Site Sustainability Factors and The Local Plan Review Sustainability Objectives

| | | | | | | Site Sust | ainability Fa | ctor | | | | |
|------|---|-----------------------|-----------------------------|------------------------|----------------------------------|------------|---------------|-----------------------------------|-----------------------------|----------------------------|---|-------------------|
| | | A | В | С | D | E | F | G | н | 1 | J | к |
| Loca | al Plan Review Sustainability Objectives | Access to services | Communit y and social | Economy A: Business | Economy B: Food production | Flood risk | Heritage | Highway s and Transpor t | Landscape and Amenity | Natural Environ ment | Infrastruct ure, 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 biologica I 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 distinct iveness 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 |

| 9 | Minimise waste production, reduce the use of | Moderate | | | | | | | | | |
|-----|--|----------|----------|----------|----------|--------|----------|----------|----------|----------|----------|
| 5 | non-renewable energy sources and support | wouerate | | | | | | | Moderate | Strong | Strong |
| | the recycling of waste products | | | | | | | | moderate | ouong | otrong |
| 10 | Minimise vulnerability and provide resilience a | | | | | | | | | | |
| 1.0 | nd adaptation to climate change, taking accou | | | | | | | | | | |
| | nt of flood | | Moderate | Moderate | Moderate | Strong | Moderate | | | Moderate | Strong |
| | risk and coastal change | | | | | | | | | | |
| 11 | New development should be designed to be | | | | | | | | | | |
| | better adapted to climate change and flood | | Moderate | Moderate | | Strong | | Moderate | Moderate | Moderate | Strong |
| | risk | | | | | | | | | | |
| 12 | Maintain and enhance human health | | Strong | | | | | | | | Moderate |
| 13 | Reduce and prevent crime, and reduce the fea | | Strong | | | | | | | | |
| | r of crime | | Strong | | | | | | | | |
| 14 | Improve the quantity and quality of Green | Strong | | | | | | | | | |
| | Infrastructure, publicly accessible open space, | | Strong | | | | | Strong | | | Strong |
| | Public Rights of Way and access | | | | | | | | | | |
| 15 | Improve the quality, range and accessibility of | Strong | | | | | | | | | |
| | services and facilities (e.g. health, transport, | | | Moderate | | | | | | | Moderate |
| | education, training, leisure opportunities) | | | | | | | | | | |
| 16 | Redress inequalities related to age, gender, | Strong | | | | | | | | | |
| | disability, race, faith, location and income | Strong | Strong | | | | | | | | |
| 17 | Ensure all groups have access to decent, | Moderate | | | | | | | | | |
| | appropriate and affordable housing | moderate | Strong | | | | | Strong | | | Moderate |
| 18 | Encourage and enable the active involvement | | | | | | | | | | |
| 1.0 | of | | Strong | | | | | | | | Moderate |
| | local people in community activities | | | | | | | | | | |
| 19 | Help people gain access to satisfying work | | | | | | | | | | |
| | appropriate to their skills, potential and place o | | Strong | Strong | | | | | | | |
| | f | | Strong | Strong | | | | | | | |
| | residence | | | | | | | | | | |
| 20 | Improve the efficiency, competitiveness and | | | Strong | | | | | | | |
| | adaptability of the local economy | | | Strong | | | | | | | |

Appendix 2: SA 2020 Table 3c Scoring Criteria

| | | | | | | Site Sustaina | bility Factor | | | | |
|--------------------------------|---|--|--|--|-----------------------|----------------------------------|--|--|--|---|---|
| Sustainability Impact Score | 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 | facilities 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 | |

| Positive/ Negative +/x | | 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 or3 | | | | | | 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 |

Appendix 3: Appraisal Tables for updated policy wording – SA 2020 and 2022 Addendum scores

Table A: Policies

SA 2020 assessments are unshaded.

SA Addendum assessments are shaded in grey.

Changes are highlighted in bold.

| Policy | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | Total + | Total - | Overall | Change | Comment |
|--------|-----|----|---|----|-----|-----|---|----|----|----|----|----|----|----|----|----|----|----|----|----|------------|------------|----------------------------------|--------|--|
| LP05 | 0 | ++ | 0 | ++ | 0 | 0 | 0 | ++ | ++ | ++ | ++ | + | 0 | ++ | ++ | 0 | + | 0 | 0 | 0 | 18 | 0 | Likely positive Effect +18 | | |
| | 0 | ++ | 0 | ++ | 0 | 0 | 0 | ++ | ++ | ++ | ++ | + | 0 | ++ | ++ | 0 | + | 0 | 0 | + | 19 | 0 | Likely positive Effect +19 | +1 | Additional positive impact on economy |
| LP06 | +/- | + | + | + | +/- | +/- | + | ++ | ++ | ++ | ++ | ++ | 0 | ++ | + | + | + | 0 | + | + | 24 | -3 | Likely positive effect +21 | | |
| | +/- | + | + | + | +/- | +/- | + | ++ | ‡ | + | + | ++ | 0 | + | + | + | + | 0 | + | + | 24 | -3 | Likely positive effect +21 | 0 | Amendments increase positive impacts on Climate Change but policy already met maximum criteria. |

| Policy | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | Total + | Total - | Overall | Change | Comment |
|--------|-----|---|---|-----|----|---|----|----|----|----|----|----|----|----|----|----|----|----|----|----|------------|------------|----------------------------------|--------|--|
| LP07 | +/- | 0 | 0 | +/- | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | ++ | 0 | 0 | ++ | ++ | 9 | -2 | Likely positive effect +7 | | |
| | +/- | 0 | + | + | + | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | ++ | 0 | 0 | ++ | ++ | 12 | -1 | Likely positive effect +11 | +4 | Additional positive impacts on designated assets |
| LP17 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | ++ | 0 | 0 | ++ | ++ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 6 | 0 | Likely Positive Effect +6 | | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | ++ | 0 | 0 | ++ | ++ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 6 | 0 | Likely Positive Effect +6 | 0 | Strengthened policy but no significant changes in scoring. |
| LP18 | 0 | + | + | + | + | + | + | ++ | ++ | + | ++ | + | 0 | + | + | 0 | 0 | 0 | 0 | 0 | 16 | 0 | Likely Positive Effect +16 | | |
| | 0 | + | + | + | + | + | + | ++ | ++ | + | ++ | + | 0 | + | + | 0 | 0 | 0 | 0 | 0 | 16 | 0 | Likely Positive Effect +16 | 0 | Strengthened policy but no meaningful changes in scoring. |
| LP19 | 0 | 0 | + | ++ | ++ | + | ++ | 0 | 0 | ++ | + | + | 0 | + | + | 0 | 0 | + | 0 | 0 | 15 | 0 | Likely Positive Effect +15 | | |

| Policy | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | Total + | Total - | Overall | Change | Comment |
|--------|---|---|---|----|----|---|----|----|----|----|----|----|----|----|----|----|----|----|----|----|------------|------------|-------------------------------------|--------|--|
| | 0 | 0 | + | ++ | ++ | + | ++ | 0 | 0 | ++ | + | + | 0 | + | + | 0 | 0 | + | 0 | 0 | 15 | 0 | Likely Positive Effect +15 | 0 | Strengthened policy but no meaningful changes in scoring. |
| LP21 | 0 | + | + | + | + | + | + | ++ | ++ | + | ++ | + | 0 | + | + | 0 | 0 | 0 | 0 | 0 | 16 | 0 | Likely Positive Effect +16 | | |
| | 0 | + | + | + | + | + | + | ++ | ++ | + | ++ | + | 0 | + | + | 0 | 0 | 0 | 0 | 0 | 16 | 0 | Likely Positive Effect +16 | 0 | Strengthened policy but no significant changes in scoring. |
| LP22 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | + | 0 | ++ | ++ | 0 | 0 | + | 0 | 0 | 7 | 0 | Likely Positive Effect +7 | | |
| | 0 | 0 | + | + | 0 | 0 | 0 | + | 0 | 0 | 0 | + | 0 | ++ | ++ | 0 | 0 | + | 0 | 0 | 9 | 0 | Likely Positive Effect +9 | +2 | Additional positive impacts on designated assets |
| LP24 | 0 | 0 | 0 | + | + | + | ++ | + | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 8 | 0 | Likely Positive Effect +8 | | |
| | 0 | 0 | 0 | + | + | + | ++ | + | + | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 9 | 0 | Likely Positive Effect +9 | +1 | Additional positive impacts on |

| Policy | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | Total + | Total - | Overall | Change | Comment |
|--------|----|---|----|----|----|---|---|----|----|----|----|----|----|----|----|----|----|----|----|----|------------|------------|----------------------------------|--------|---|
| | | | | | | | | | | | | | | | | | | | | | | | | | flood resilience |
| LP25 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | ++ | 0 | 0 | ++ | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 6 | 0 | Likely Positive Effect +6 | | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 | ++ | 0 | 0 | ++ | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 6 | 0 | Likely Positive Effect +6 | 0 | Strengthened policy but no significant changes in scoring. |
| LP27 | ++ | 0 | ++ | ++ | ++ | 0 | 0 | ++ | ++ | 0 | ++ | ++ | 0 | ++ | ++ | ++ | 0 | + | 0 | + | 22 | 0 | Likely Positive Effect +22 | | |
| | ++ | 0 | ++ | ++ | ++ | 0 | 0 | ++ | ++ | 0 | ++ | ++ | 0 | ++ | ++ | ++ | 0 | + | 0 | + | 22 | 0 | Likely Positive Effect +22 | 0 | Amendments increase positive impacts on designated assets and environment, but policy already met maximum criteria. |

Table B: Site Appraisals 2020 and 2022 Addendum

KEY: ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain

SA 2020 assessments are unshaded. SA Addendum assessments are shaded in grey. Any changes are highlighted in bold.

| Ref | Policy | Access to Services | Community & Social | Economy A- Business | Economy B- Food Production | Flood Risk | Heritage | Highways and Transport | Landscape and Amenity | Nat. Environment | Infrastructure, Pollution & Waste | Climate Change |
|------|--------------------------|-----------------------|-------------------------------|------------------------|----------------------------------|---------------|-------------|------------------------------|-----------------------------|---------------------|---|-------------------|
| 9.1 | E1.1 King's Lynn Town | ++ | + | + | 0 | x | + | + | + | 0 | + | + |
| | Centre | ++ | + | + | 0 | x | + | + | + | 0 | + | + |
| Comr | nentary | There is no positive. | change in the | assessment. 1 | The new word | ing provid | les additio | nal support f | or markets an | d the impact on | the economy is s | still |
| 9.1 | E1.3 Gaywood | ++ | + | + | 0 | 0 | # | + | 0 | 0 | + | + |
| | Clock | ++ | + | + | 0 | 0 | # | + | 0 | 0 | + | + |
| Comr | nentary | | change in the still positive. | | l Fhe new word | ing provid | les additio | al support f | or sustainable | transport and t | he impact on Hig | hways & |
| 9.1 | E1.5 Boal | ++ | + | 0 | 0 | +/x | # | # | # | # | ? | +/# |
| | Quay | ++ | + | 0 | 0 | +/x | # | # | # | # | ? | +/# |
| Comr | nentary | There is no | change in the | assessment. | The new word | ing provid | les additio | hal flexibility | in terms of h | busing numbers | | |
| 9.1 | E1.8 South | ++ | + | + | 0 | x | # | # | 0 | 0 | # | n/a |
| | Quay | ++ | + | + | 0 | x | # | # | 0 | 0 | # | n/a |
| Comr | nentary | No significa | ant change to S | 5A 2020. | | I | | | | | | |

| Ref | Policy | Access to Services | Community & Social | Economy A- Business | Economy B- Food Production | Flood Risk | Heritage | Highways and Transport | Landscape and Amenity | Nat. Environment | Infrastructure, Pollution & Waste | Climate Change |
|------|---------------------------------------|-----------------------------|------------------------------------|------------------------|----------------------------------|---------------|-------------|------------------------------|-----------------------------|---------------------|---|-------------------|
| 9.2 | E1.15 Land at Bankside | ++ | + | 0 | + | x | 0 | # | + | 0 | # | n/a |
| | | ++ | + | 0 | + | x | 0 | # | + | 0 | # | n/a |
| Comm | nentary | No significa | ant change to S | SA 2020. | | | | | 1 | 1 | | |
| 9.3 | E2.1 | ++ | + | + | 0 | 0 | 0 | + | + | 0 | + | N/A |
| | | ++ | + | + | 0 | 0 | 0 | + | + | 0 | + | N/A |
| Comm | nentary | | in dwellings to in terms of the | | | | ases delive | rability and o | could reduce e | environmental ir | npacts. The chan | ge is not |
| 9.4 | E3.1 | + | +/x | + | х | +/x | # | ++ | +/x | ? | 0 | N/A |
| | | + | +/x | + | x | +/x | # | ++ | +/x | ? | 0 | N/A |
| Comm | nentary | The amend not change | • | additional pr | otection for d | esignated | sites and a | issets, howe | ver the impact | ts are still uncer | tain and the app | raisal has |
| 10.1 | Downham Market F1.1 Town Centre | ++ | + | + | 0 | 0 | 0 | + | + | 0 | + | n/a |
| | | ++ | + | + | 0 | 0 | 0 | + | + | 0 | + | n/a |
| Comm | nentary | No significa Class order | - | A 2020. The p | olicy offers ac | ditional | support for | markets (Ec | onomy A) and | corrects referen | nces to the updat | ed Use |
| 10.2 | Hunstanton Policy F2.1 | ++ | ++ | + | 0 | + | # | # | # | 0 | x | + |
| | | ++ | ++ | + | 0 | + | # | # | # | 0 | x | + |
| Comm | nentary | No significa Class order | • | 6A 2020. The p | olicy offers ac | ditional | upport for | markets (Ec | onomy A) and | corrects referen | nces to the updat | ed Use |

| Ref | Policy | Access to Services | Community & Social | Economy A- Business | Economy B- Food Production | Flood Risk | Heritage | Highways and Transport | Landscape and Amenity | Nat. Environment | Infrastructure, Pollution & Waste | Climate Change |
|-----------|--|-------------------------|-----------------------|------------------------|----------------------------------|---------------|-------------|------------------------------|-----------------------------|---------------------|---|-------------------|
| 10.2 | Hunstanton Policy F2.3 | ++ | + | 0 | x | + | # | # | # | ? | x | +/- |
| | | ++ | + | 0 | x | + | # | # | # | ? | x | +/- |
| Comm | nentary | The amend not change | • | e additional pr | otection for d | esignated | sites and a | assets, howe | ver the impac | ts are still uncer | tain and the app | raisal has |
| 12.5 | G29.1 (Dersingham | + | + | 0 | + | + | + | + | # | # | ? | +/# |
| | - Land north of Doddshill Road) | + | + | 0 | + | + | + | + | # | +/# | ? | +/# |
| | I | The update | ed policy word | ing is more pro | otective of the | e natural e | environmer | nt and the lik | ely positive e | fects have incre | ased. | |
| 12.5 | G29.2 (Dersingham | + | + | 0 | + | + | x | # | x | 0 | 0 | +/# |
| | - Land at Manor Road) | + | + | 0 | + | + | x | # | x | +/# | 0 | +/# |
| Comm | nentary | The update | ed policy word | ing is more pro | otective of the | e natural e | environmer | nt and the lik | ely positive e | ffects have incre | ased. | |
| 12.1 1 | G41.2 (Grimston and Pott Row | ++ | | 0 | 0 | + | 0 | + | 0 | 0 | x | # |
| | - Land adjacent Stave Farm, west of Ashwicken Road) | ++ | + | 0 | 0 | + | 0 | + | 0 | +/# | x | +/# |
| Comm | entary | The update | ed policy word | ing is more pro | otective of the | e natural e | environmer | nt and the lik | ely positive e | fects have incre | ased. | |

Appendix 4: LP01 Spatial Distribution Analysis

1. The SA (2020) considered five options for 'LPO1 Spatial Distribution' as set out in the table below, plus a 'no policy' option. The preferred option (Revised Option 2A) was then considered against a new option "Local Plan Review" (LPR), following the Regulation 18 Consultation of the Local Plan Review.

Figure A4.1: Percentage of housing growth allocated by area

| Area | Option 1 - King's Lynn Area (Core Strategy) | Option 2 - Spread | Option 2A Hybrid Spread | Option 3 - Rural Focus | Option 4 - New Settlement | Option 5 - Wisbech Fringe |
|------------------|---|----------------------|-------------------------------|------------------------------|---------------------------------|---------------------------------|
| King's Lynn and | | | | | | |
| Surrounding Area | 50 | 30 | 55 | 30 | 20 | 30 |
| Wisbech Fringe | 15 | 20 | 0 | 15 | 10 | 40 |
| Downham Market | 15 | 20 | 18 | 15 | 5 | 10 |
| Hunstanton | 0 | 0 | 2 | 0 | 0 | 0 |
| Watlington | 0 | 0 | 5 | 10 | 0 | 0 |
| Marham | 0 | 0 | 2 | 0 | 0 | 0 |
| KRSC | 15 | 20 | 18 | 25 | 10 | 15 |
| Rural Villages | 5 | 10 | 0 | 5 | 5 | 5 |
| SVAH | 0 | 0 | 0 | 0 | 0 | 0 |
| New Settlement | 0 | 0 | 0 | 0 | 50 | 0 |
| Total | 100 | 100 | 100 | 100 ⁷ | 100 | 100 |

2. An appraisal of these options can be found in the SA 2020⁸

3. The options assessed at the beginning of the plan-making process were based on assumptions around higher housing growth than have been taken forward in the Local Plan Review. The preferred option 'Local Plan Review' forms the basis of 'LPO1 Spatial Distribution' within the submission Plan and sets out a

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⁷ The percentages for Option 4 have been amended as the allocation to Watlington was previously double counted in the table within the SA 2020 as part of Rural Villages. ⁸ <u>https://www.west-norfolk.gov.uk/download/id/6340/final1_sustainability_appraisal-_strategic_environmental_assessment_for_the_local_plan_review_2020.pdf</u>

distribution for a lower level of housing growth, largely in the areas already allocated within the adopted Local Plan. Additional development would mostly be centred around King's Lynn, the A10 and the Rail Line Growth Corridor. In those respects, Option 'LPR' closely aligns with Revised Option 2A.

Figure A4.2: Spread of Housing (%) for Option 2A and Option 7

| Area | Option 2A Hybrid Spread | Option 7 LPR Growth |
|----------------------------------|-------------------------|---------------------|
| King's Lynn and Surrounding Area | 55 | 63 |
| Wisbech Fringe | 0 | 9 |
| Downham Market | 18 | 6 |
| Hunstanton | 2 | 5 |
| Watlington | 5 | 1 |
| Marham | 2 | 1 |
| KRSC | 18 | 12 |
| Rural Villages | 0 | 3 |
| SVAH | 0 | 0 |
| New Settlement | 0 | 0 |
| Total | 100 | 100 |

Option 2A A10 & Rail Line Growth Corridor

4. Option 2A scored highest of the original five options (and the 'no policy' option) and was considered the most sustainable way to deliver the higher growth envisaged in earlier plan documents.

5. The approach in Option 2A is similar to Option 2, but with a focus on the A10 and Main Rail Line to London. The New Anglia Local Enterprise Partnership (LEP) in their Strategic Economic Plan (SEP) highlight King's Lynn and Downham Market as Growth Points, and the area between the two settlements, which includes Watlington, as a Growth Corridor.

- 55% of the new growth through residential allocations is proposed for King's Lynn, which supports the continuation of development at West Winch.
- 18% attributed to Downham Market.
- The Wisbech Fringe area is not allocated any further growth recognising that it will take some time for the current development to be realised in full.

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- Watlington would receive 5% of the required growth; this settlement has been singled out as it benefits from a range of local services and facilities including importantly a railway station on the main line from King's Lynn to Cambridge and London King's Cross.
- 2%, is attributed to the Hunstanton, recognising the degree of land that might be available and still supporting the growth of the town.
- Marham would receive 2% of the required growth; this settlement has been highlighted due to the presence of RAF Marham as a key employment area.
- The Key Rural Service Centres are supported; these offer a range of services and facilities to their local population which could facilitate future growth.

| | | | | | | | | | | | LP01 | l: Sp | atial | Strate | gy | | | | | | | | |
|---|--------|---|---|-----|-----|----|----|----|---|----|------|-------|-------|--------|-------|-----|----|----|----|----|-----|--------|-------------------------------|
| | | | | | | | | | | | | | | SA Ob | jecti | ve: | | | | | | | |
| Policy | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | + | - | Overall Effect |
| Option 1 - King's Lynn Area (as per CS) | | - | - | +/- | • • | + | + | ++ | - | - | + | + | + | + | + | + | + | + | ++ | + | +16 | -7 | Likely Positive Effect +9 |
| Option 2 - Spread | | - | - | + | o | + | + | ++ | | - | + | + | + | + | + | + | + | + | ++ | + | +16 | - 7 | Likely Positive Effect +9 |
| LP01 Option 2A- Hybrid Spread | | - | - | ÷ | 0 | + | + | ++ | | + | + | + | + | + | ++ | + | + | + | ++ | + | +18 | -6 | Likely Positive Effect +12 |
| Option 3 - Rural Focus | | - | - | + | 0 | -? | -? | ++ | - | - | + | + | + | + | + | + | + | + | + | + | +13 | -9 | Likely Positive Effect +4 |
| Option 4 - New Settlement | - ? | - | - | ? | 0 | ? | ? | ++ | - | + | + | + | + | + | + | + | + | + | ? | + | +12 | -5 | Likely Positive Effect +6 |
| Option 5 - Wisbech Fringe | | - | - | + | 0 | + | + | ++ | - | - | + | + | + | + | + | + | + | + | + | + | +15 | -6 | Likely Positive Effect +9 |

Figure A4.3: SA 2020 Appraisal of Options 1 to 5, including 2A

Option 6 - No Local Plan Policy

6. The SA 2020 identified a sixth option where no distribution of housing need was proposed. This option would only realistically come to pass where the Review revoked the old Core Strategy and Allocation policies without a replacement strategy. Development would occur through ad-hoc windfall sites to meet the higher level of growth anticipated in the original assessments, with the resulting negative impacts on sustainability objectives. Any development under this option would also need to meet the requirements of the NPPF 2021, which requires development to be sustainable. It is reasonable to expect that impacts on sustainability would still be controlled through the provisions in the NPPF.

7. A revised assessment is set out below. The original appraisal is unshaded and the revised appraisal is shaded grey.

| Policy | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | Total + | Total - | Overall | Change | Comment |
|-------------------------|---|---|---|-----|---|---|---|---|---|----|----|----|----|----|----|----|----|----|----|----|------------|------------|---------------------------------|--------|--|
| LP01 Option 6- No | | - | - | +/- | 0 | ? | - | 0 | - | - | + | + | + | + | 0 | 0 | ? | ? | ? | + | 6 | -8 | Likely negative effect -2 | | |
| Local Plan Policy | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | Neutral | +2 | Provisions in the wider Plan review and the NPPF would ensure that the impact of this option would be at least neutral. |

Option 6a – No new policy

8. In addition to the 'no policy' option (Option 6) and 'Local Plan Review' (Option 7), there is also potential for a 'no new policy' option (Option 6A), where the policy is not updated from the Core Strategy and existing Site Allocations. This option was not assessed in the SA 2020 as it would not have provided the appropriate level of growth envisaged for the Local Plan Review. The need for a 'No new policy' option becomes reasonable when assessing the lower levels of housing growth, and any reasonable alternatives to Option 7 'Local Plan Review'.

9. A new assessment is set out below.

| Policy | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | Total | Total | Overall | Comment |
|---|---|---|---|---|---|---|---|---|---|----|----|----|----|----|----|----|----|----|----|----|-------|-------|---------------------------------|---|
| LP01 Option 6a- No new policy | + | + | 0 | + | + | ? | + | 0 | 0 | 0 | 0 | 0 | 0 | ? | 0 | 0 | ? | ? | 0 | 0 | 5 | 0 | Likely positive effect +5 | This option is more sustainable than reliance on the NPPF as allocations in the existing plan have been through examination and sit within the wider development plan. |

Option 7 Local Plan Review

10. A revised assessment is set out below. The original appraisal is unshaded and the revised appraisal is shaded grey.

| Policy | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | Total | Total | Overall | Change | Comment |
|--------|---|---|---|---|---|---|---|----|---|----|----|----|----|----|----|----|----|----|----|----|-------|-------|------------|--------|--------------|
| | | | | | | | | | | | | | | | | | | | | | + | - | | | |
| LP01 | - | | - | + | 0 | + | + | ++ | - | + | + | + | + | + | + | + | + | + | ++ | + | 17 | -5 | Likely | | |
| Option | | | | | | | | | | | | | | | | | | | | | | | positive | | |
| 7- | | | | | | | | | | | | | | | | | | | | | | | effect +12 | | |
| Local | - | | - | + | 0 | + | + | ++ | - | + | + | + | + | + | + | + | + | + | ++ | + | 17 | -5 | Likely | No | There are no |
| Plan | | | | | | | | | | | | | | | | | | | | | | | positive | change | significant |
| Review | | | | | | | | | | | | | | | | | | | | | | | effect +12 | | changes to |
| | | | | | | | | | | | | | | | | | | | | | | | | | the SA 2020 |
| | | | | | | | | | | | | | | | | | | | | | | | | | assessment. |

Summary of alternatives and selection of preferred option 'Local Plan Review'

11. Option 2A was considered to deliver the most sustainable outcomes for a higher level of housing growth. The submission Plan envisages that those levels of housing growth anticipated will be delivered over a longer period of time, with a smaller amount of development in the Plan period.

12. Option 7 LPR reflects this new position. It is reasonable to assume that Option 7 is the most sustainable option, where it aligns with Option 2A.

13. Option 7 LPR sets out a similar percentage split of development in settlements across the plan area as Option 2A. It sets a lower level of development across those settlements which will arguably result in lower absolute environmental impacts, as reflected in the appraisal scoring. The level of development and distribution pattern within Option LPR still meets a threshold that would provide the necessary supporting infrastructure to ensure development is sustainable and negative impacts are minimised.

14. Other reasonable alternatives to Option 7 could be:

- Original Options 1 to 5 with a lower level of housing growth
- Original Option 6 No plan policy
- Option 6A Existing Plan policy

Alternative Options 1 to 5

15. The original Options 1 to 5 have been discounted as reasonable alternatives. The Plan Review does not anticipate a significant level of housing growth to come forward in addition to the allocations within the existing adopted Plan. Options 1 to 5 considered allocations above the level of development within the

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adopted Plan. Redirecting development to align with Options 1 to 5, with lower levels of development, would result in the Plan Review supporting less sustainable development, where Option 2A was assessed as providing the most sustainable locations. Option 7 provides for development in similar locations to Option 2A and is therefore considered a more sustainable option than Options 1 to 5.

Alternative Option 6 – No Plan policy

16. Without a local plan policy for distribution of development, development would come forward on an ad-hoc basis, with no strategic direction. Wider strategic opportunities for environmental and social improvements, as well as sustainable provision of infrastructure would be lost. The impact on sustainability objectives would be increasingly unknown, even with the small level of growth anticipated above the allocations in the adopted Plan. Option 7 allows for development in locations that are assessed to be the most sustainable, with more certain impacts on the sustainability objectives.

Alternative Option 6a – Existing Plan policy

17. The existing allocations in the adopted Local Plan have a similar geographical spread to Option 2A and Option 7. The assessment of Option 6a shows that the impacts on the sustainability objectives are therefore similar.

18. Option 6a, without any amendment, would not provide for the small increase in development proposed in the Local Plan Review.

19. Option 2A and Option 7 allow for a small increase in development and align with the updated proposals and policy provisions set out in the wider Local Plan Review.

Conclusion - Preferred Option 7 'Local Plan Review'

20. Option 7 is distinct from Options 2A in that it provides for a lower level of growth within the plan period but broadly aligns with the spatial distribution. Option 6A reflects the lower level of growth, through existing allocations, but would not allow the Plan to make best use of the evidence currently available, or to control the spatial distribution of the additional levels of development.

21. The SA scores for all three options are similar, however Option 7 is the most reasonable in terms of the level of development it provides in the most sustainable distribution.

Appendix 5: Revised Monitoring Indicators

1. The table below sets out a series of suggested indicators and where these indicators will link to monitoring as set out in the Local Plan Review.

2. Regulation 17 of the Environmental Assessment of Plans and Programmes Regulations 2004 requires that the significant environmental effects of implementing a Plan should be monitored. Government guidance on the preparation of Sustainability Appraisal⁹ states that... "Details of monitoring arrangements may be included in the sustainability appraisal report, the post-adoption statement or in the local plan itself. The monitoring results should be reported in the local planning authority's Monitoring Report."

3. The SA Scoping Reports for the BKLWN LPR considered the potential impacts that the SA should monitor in relation to the baseline data. The recommendations from the SA 2020 were incorporated into the Monitoring section of the Local Plan Review. The SA Addendum picks up comments made in relation to the SA consultations, particularly by Natural England, and makes a series of recommendations in relation to indicators to be considered in finalising the Local Plan Review. The indicators will be updated as and when modifications are made to the Local Plan during the examination process.

4. The SEA Post-Adoption Statement will include a final set of indicators with links to specific policies in the Local Plan monitoring schedule. Monitoring will be undertaken through the BKLWN AMR, the AMR for Norfolk County Council, and through the Habitat Regulation Monitoring and Mitigation/Green Infrastructure Panel.

5. The strategic policies in the Local Plan will relate to all the Sustainability Objectives. The last column indicates where these suggested indicators could link to policies within the Local Plan Review.

| Topics | Local Plan Review Sustainability Objectives | SEA Environmental Effect 'Issues' | Suggested Indicators | Links to Local Plan Review Policy Indicators |
|-----------------------------|---|---|---|--|
| Land and Water Resources | 1. Minimise the irreversible loss of undeveloped Greenfield land, agricultural (Best Most Versatile 1- 3) land and productive agricultural holdings | Soil Water Material assets Landscape | Applications granted on undeveloped Greenfield land, agricultural land (Grades 1-3) Applications for inappropriate development refused on | Strategic Policies where they direct development away from sensitive locations Policies for development with criteria related to water |
| | | | undeveloped Greenfield land, agricultural land (Grades 1-3) | consumption |

⁹ https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal (Paragraph: 025 Reference ID: 11-025-20140306 Revision date: 06 03 2014)

| Topics | Local Plan Review Sustainability Objectives | SEA Environmental Effect 'Issues' | Suggested Indicators | Links to Local Plan Review Policy Indicators |
|----------------------------------|---|--|---|--|
| Biodiversity and Geodiversity | 2. Limit water consumption to levels supportable by natural processes and storage systems 3. Maintain, restore and enhance the natural environment and sites designated for biological and geological interest 4. Maintain and enhance the range, functionality and connectivity of characteristic habitats and species | Biodiversity Fauna Flora Soil Water Landscape | Applications granted with appropriate links to water supply network Applications granted with conditions related to sustainable drainage and use of grey water, and monitoring of conditions Applications granted or refused on designated sites Percentage of major developments generating overall biodiversity enhancement in terms of the national metric Hectares of biodiversity habitat delivered through strategic site allocations Monitoring of conditions related to habitat creation and restoration, and effectiveness of implementation of | All policies where development could provide additional functionality and connectivity for habitats and species Policies related to the protection of the natural environment |
| Landscape and | E Avoid damage to protected sites | Material assets | the BNG metric Applications granted or refused | All policies related to |
| Townscape | 5. Avoid damage to protected sites and historic buildings | • Cultural heritage including | within designated landscapes and their settings | development sites within proximity to protected sites |
| | 6. Maintain and enhance the diversity and distinctiveness of landscape and townscape character | architectural and archaeological heritage | Applications granted related to the historic environment | and historic buildings |

| Topics | Local Plan Review Sustainability Objectives | SEA Environmental Effect 'Issues' | Suggested Indicators | Links to Local Plan Review Policy Indicators |
|---------------------------------|--|--|--|---|
| | 7. Create places, spaces and buildings that work well, wear well and look good | • Landscape | Applications refused because of unacceptable impact on the historic environment Monitoring of conditions related to archaeological sites or sites of historic interest Monitoring of major development schemes and conditions on applications related to design and materials | Policies related to the protection of landscape and the historic environments Policies related to the design of development |
| Climate Change and Pollution | 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. 9. Minimise waste production, reduce the use of non-renewable energy sources and support the recycling of waste products 10. Minimise vulnerability and provide resilience and adaptation to | Soil Water Climatic factors Material assets Coastal erosion/ Flood risk Energy High GHG emissions Design & quality Transport | Applications granted in support of sustainable transport Applications granted or refused in the AQMAs for air quality reasons Applications granted for small scale renewable energy Applications approved against Environment Agency advice on flood risk Applications granted related to development for flood resilience and coastal change | Policies related amenity and environmental protection Policies related to climate change and adaptation Policies related to the AQMAs Policies related to flood risk Policies related to coastal change |

| Topics | Local Plan Review Sustainability Objectives | SEA Environmental Effect 'Issues' | Suggested Indicators | Links to Local Plan Review Policy Indicators |
|--------------------------|---|---|--|---|
| | climate change, taking account of flood risk and coastal change 11. New development should be designed to be better adapted to climate change and flood risk | | Monitoring of relevant conditions on applications | |
| 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 (PRoW) and access | Population Human health (There are also links to Biodiversity, Flora and fauna, Soil and Water) | Applications granted where accompanied by Health Impact Assessments Percentage of the city's population having access to a natural greenspace within 400 metres of their home. Hectares of accessible open space per 1000 population Applications granted with specific improvements for green infrastructure Applications granted with impacts on PRoW or local footpaths | Policies related to urban design Policies related to amenity and environmental protection Policies relating to the provision of green infrastructure, open space Policies related to the wider natural environment |
| Inclusive Communities | 15. Improve the quality, range and accessibility of services and facilities (e.g. health, transport, education, training, leisure opportunities) | Population | Applications granted for community, education and training facilities Applications granted that resulted in a loss of community facilities | Policies related to the provision of Community facilities Sustainable transport Education and training |

| Topics | Local Plan Review Sustainability Objectives | SEA Environmental Effect 'Issues' | Suggested Indicators | Links to Local Plan Review Policy Indicators |
|-------------------|--|---|--|--|
| | 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 | | Applications granted for affordable housing in line with policy Applications granted for affordable housing against policy requirements | • Leisure facilities Policies related to the provision of affordable housing and tenure mix |
| | 18. Encourage and enable the active involvement of local people in community activities | | | |
| Economic Activity | 19. Help people gain access to satisfying work appropriate to their skills, potential and place of | Population Material assets | Applications granted for economic and industrial development, training and education facilities (floorspace) | Policies related to employment provision |
| | residence 20. Improve the efficiency, | | Applications granted in support of the local economy (floorspace) | Policies related to education and skills |
| | competitiveness and adaptability of the local economy | | | Policies related to the local economy |