



Borough Council of King's Lynn and West Norfolk Local Plan Examination

Sustainability Appraisal Mitigation Note (December 2022)

Sustainability Appraisal and Mitigation

December 2022

1.1 All policies have been assessed against that SA Sustainability Objectives and the Site Sustainability Factors, which require consideration of mitigation as part of the sustainability appraisal. References to mitigation within this document relate only to sustainability assessment and are not related to separate consideration of mitigation, as part of the HRA.

Figure 1: Relationship between SA Objectives and Site Sustainability Factors

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

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

1.2 The following table summarises the assessment within the SA 2020 documentation, in relation to mitigation. The 2020 and 2021 wording changes, as assessed within the SA update dated 2022, show how wording has been strengthened to mitigate development within policy implementation.

Figure 2: Policy wording within the Submission Plan and consideration of mitigation within the Sustainability Appraisal documentation, prepared in support of the submission plan.

Policy/Reference	SA assessment documents	Mitigation referred to in policy text	Reference to mitigation in SA scoring or commentary
LP01: Spatial Strategy	An updated appraisal has been included in the SA 2022 update to expand on the assessment in SA 2020.	Policy requires protection of heritage, cultural and environmental assets and avoidance of flood risk.	The SA commentary considers the spatial options and which option would be most able to support appropriate levels of development with mitigation, if and when required. This has been incorporated into the updated LP01, as submitted.
LP02: Settlement Hierarchy	No material change to SA 2020.	Policy requires development to be sustainable and sympathetic to local character.	The SA commentary considers the settlement hierarchy against the SA objectives, and concludes that the wording of LP02 will ensure against inappropriate development locations.
LP03: Presumption in favour of Sustainable Development	No material change to SA 2020.	Policy requires consideration of sustainable development and NPPF requirements.	The SA commentary acknowledges the consideration of sustainable development. Mitigation is inherent within that consideration, in allowing development proposals.
LP04: Development Boundaries	No further assessment	Policy requires detailed consideration of implications of development outside development boundaries.	The SA commentary includes reference to countryside buffers.
LP05: Infrastructure Provision	An updated appraisal has been included in the SA 2022 update to expand on the assessment in SA 2020.	Policy requires provision of infrastructure on and off-site in a timely manner, and the provision of specific infrastructure to support and mitigate development	The SA commentary notes provision of CIL within the policy text.
LP06: Climate Change	An updated appraisal has been included in the SA 2022 update to expand on the assessment in SA 2020.	Policy requires mitigation in relation to climate change.	The SA commentary notes the provision of the new Climate Change policy will ensure a number of mitigation measures in relation to development, including mitigation of flood risk.
LP07: The economy	An updated appraisal has been included in the SA 2022	Policy requires detailed consideration of impacts on sectors of economy.	The SA assessment and commentary acknowledges the potential for impacts on SA Objective 4, picking up the

Policy/Reference	SA assessment documents	Mitigation referred to in policy text	Reference to mitigation in SA scoring or commentary
	update to expand on the assessment in SA 2020.		comments from the HRA. The policy wording was subsequently amended.
LP08: Retail development	No material change to SA 2020.	Policy requires detailed consideration of impacts on retail sector.	The SA assessment did not identify any potential negative impacts for mitigation.
LP09: Touring and Permanent Holiday 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.	Policy requires detailed consideration of impacts relating to touring and holiday site provision.	The SA assessment did not identify any potential negative impacts for mitigation.
LP10: Development associated with the National Construction College site, Bircham Newton (CITB), British Sugar Factory, Wissington and RAF Marham Policy	No material change to SA 2020.		The SA assessment did not identify any potential negative impacts for mitigation.
LP11: Strategic and Major Road Network Policy	No material change to SA 2020.	Policy wording requires a transport assessment and criteria limiting cumulative impacts.	The SA scoring identified potential negative impacts on SA Objectives 1, 4, 6 and 9 which can be mitigated through appropriate policy wording.
LP12: Disused Railway Trackways Policy	No material change to SA 2020.	Policy wording requires alternative provision if there are impacts on existing disused trackways.	The SA scoring identified potential negative impacts on SA Objectives 1, 4, 6 and 9 which can be mitigated through appropriate policy wording.
LP13: Transportation Policy	No material change to SA 2020.	Policy wording seeks improvements to the	The SA scoring identified potential negative impacts on SA Objective 7 which can be mitigated through appropriate policy wording.

Policy/Reference	SA assessment documents	Mitigation referred to in policy text	Reference to mitigation in SA scoring or commentary
		transport network and air quality.	
LP14: Parking Provision in New Development	No material change to SA 2020.	Requires adequate provision, and relationship with more sustainable modes of transport.	The SA scoring identified potential negative impacts on SA Objectives 1 and 6 which can be mitigated through appropriate policy wording.
LP15: Coastal Areas Policy	No material change to SA 2020.		The SA assessment did not identify any potential negative impacts for mitigation.
LP16: New LP16 Norfolk Coast AONB Policy	No material change to SA 2020.		The SA assessment did not identify any potential negative impacts for mitigation.
LP17: Coastal Change Management Area (Hunstanton to Dersingham) Policy	An updated appraisal has been included in the SA 2022 update to expand on the assessment in SA 2020.		The SA assessment did not identify any potential negative impacts for mitigation.
LP18: Design and Sustainable Development	An updated appraisal has been included in the SA 2022 update to expand on the assessment in SA 2020.		The SA assessment did not identify any potential negative impacts for mitigation.
LP19: Environmental Assets - Green Infrastructure, Landscape Character, Biodiversity and Geodiversity	An updated appraisal has been included in the SA 2022 update to expand on the assessment in SA 2020.		The SA assessment did not identify any potential negative impacts for mitigation.
LP20: Environmental Assets – Historic Environment	No material change to SA 2020.		The SA assessment did not identify any potential negative impacts for mitigation.
LP21: Environment, Design and Amenity	An updated appraisal has been included in the SA 2022		The SA assessment did not identify any potential negative impacts for mitigation.

Policy/Reference	SA assessment documents	Mitigation referred to in policy text	Reference to mitigation in SA scoring or commentary
	update to expand on the assessment in SA 2020.		
LP22: Provision of Recreational Open Space for Residential Developments	An updated appraisal has been included in the SA 2022 update to expand on the assessment in SA 2020.		The SA assessment did not identify any potential negative impacts for mitigation.
LP23: Green Infrastructure	No material change to SA 2020.		The SA assessment did not identify any potential negative impacts for mitigation.
LP24: Renewable Energy	An updated appraisal has been included in the SA 2022 update to expand on the assessment in SA 2020.		The SA assessment did not identify any potential negative impacts for mitigation.
LP25: Sites in Areas of Flood Risk	An updated appraisal has been included in the SA 2022 update to expand on the assessment in SA 2020.		The SA assessment did not identify any potential negative impacts for mitigation.
LP26: Protection of Open Space	No material change to SA 2020.		The SA assessment did not identify any potential negative impacts for mitigation.
LP27: Habitats Regulation Assessment	An updated appraisal has been included in the SA 2022 update to expand on the assessment in SA 2020.		The SA assessment did not identify any potential negative impacts for mitigation.
LP28: Affordable Housing	No material change to SA 2020.		The SA assessment did not identify any potential negative impacts for mitigation.
LP29: Housing for the elderly and specialist care	No material change to SA 2020.		The SA assessment did not identify any potential negative impacts for mitigation.
LP30: Adaptable & Accessible Homes	No material change to SA 2020.		The SA assessment did not identify any potential negative impacts for mitigation.
LP31: Residential Development Reasonably Related	No material change to SA 2020.	Policy does not apply within the AONB and requires positive contribution to character,	The SA assessment identified potential impacts on SA Objective 1 (Greenfield or agricultural land) and SA Objective 6 (Townscape) which can be mitigated through appropriate policy wording.

Policy/Reference	SA assessment documents	Mitigation referred to in policy text	Reference to mitigation in SA scoring or commentary
to Existing Settlements Policy		conserving and enhancing natural and historic assets.	
LP32: Houses in Multiple Occupation Policy	No material change to SA 2020.		The SA assessment did not identify any potential negative impacts for mitigation.
LP33: Enlargement or Replacement Dwellings in the Countryside Policy	No material change to SA 2020.	Policy requires positive design or applications may be refused.	The SA assessment identified potential impacts on SA Objective 17 (Appropriate housing) which can be mitigated through appropriate policy wording.
LP34: Housing Needs of Rural Workers Policy	No material change to SA 2020.		The SA assessment did not identify any potential negative impacts for mitigation.
LP35: Residential Annexes Policy	No material change to SA 2020.		The SA assessment did not identify any potential negative impacts for mitigation.
LP36: Community and Culture	No material change to SA 2020.	Policy requires high quality and appropriate design, protection of cultural assets and cross-references relevant environmental policies.	The SA assessment identified potential impacts on SA Objective 11 (Flood Risk) which can be mitigated through appropriate policy wording.

Site Allocation policies and mitigation within the Sustainability Appraisals

2.1 Sites policies require provision of SUDS; Open Space; Green Infrastructure; Appropriate infrastructure contributions and on-site or off-site provision; appropriate levels of affordable housing; mitigation of flood risk; protection of cultural, heritage and environmental assets. Policy criteria require the provision of additional, detailed studies at the time planning applications are submitted.

2.2 A summary of the SA commentary and scoring in relation to mitigation is set out in the table below:

Figure 3: Site allocations and mitigation within the Sustainability Appraisal

Site Allocations	SA commentary and Scoring in relation to mitigation
<p>LP38 - Kings Lynn E1.1 - Kings Lynn: Town Centre E1.2 - Kings Lynn: Port E1.3 - Kings Lynn: Gaywood Clock E1.KLR - Kings Lynn: Riverfront Regeneration Area E1.5 - Kings Lynn: Boal Quay E1.6 - Kings Lynn: South of Parkway E1.7 - Kings Lynn: Land at Lynnsport E1.8 - Kings Lynn: South Quay E1.9 - Kings Lynn: Land west of Columbia Way E1.10 - Kings Lynn: North of Wisbech Road E1.11 - Kings Lynn: Southgates E1.12 - Kings Lynn: Employment Land E1.13 - Kings Lynn: Green Infrastructure E1.14 - West Lynn: Land West of St Peter's Road E1.15 - West Lynn: Land at Bankside E2.1 - West Winch Growth Area E2.2 - Development within existing built up areas of West Winch E3.1 - South Wootton Hall Lane</p>	<p>The SA assessment identified potential impacts on SA Objectives 1, 2, 3, 4, 8 and 9 which can be mitigated through policy wording and the appropriate detailed assessments at planning application stage.</p> <p>Potential negative impacts for the proposed site allocations were identified in relation to flood risk. These could be mitigated through appropriate policy wording and appropriate detailed assessments at the planning application stage.</p>
<p>LP39 - Downham Market F1.1 - Downham Market Town Centre Area and Retailing F1.2 - Downham Market Land off St. Johns Way F1.3 - Downham Market North-East: Land east of Lynn Road in vicinity of Bridle Lane F1.4 - Downham Market South East: Land north of southern bypass in vicinity of Nightingale Lane</p>	<p>The SA assessment identified potential impacts on SA Objectives 1, 2, 3, 4, 8 and 9 which can be mitigated through policy wording and the appropriate detailed assessments at planning application stage.</p> <p>Potential negative impacts for the proposed site allocations were identified in relation to flood risk. These could be mitigated through appropriate policy wording and appropriate detailed assessments at the planning application stage.</p>
<p>LP40 - Hunstanton F2.1 - Hunstanton Town Centre Area and Retailing F2.2 - Hunstanton Land to the east of Cromer Road F2.3 - Hunstanton Land South of Hunstanton Commercial Park F2.4 - Hunstanton Land north of Hunstanton Road</p>	<p>The SA assessment identified potential impacts on SA Objectives 1, 4, 6 and 11 which can be mitigated through policy wording and the appropriate detailed assessments at planning application stage.</p>

Site Allocations	SA commentary and Scoring in relation to mitigation
F2.5 - Hunstanton Employment Land south of Hunstanton Commercial Park F3.1 - Wisbech Fringe: Land east of Wisbech (west of Burrettgate Road)	Site Allocation assessments noted the potential negative impacts on cultural and historic assets, as well as the proximity of the AONB. The SA commentary notes that the potential for impacts is dependant on the implementation of policy and appropriate policy criteria would be required.
Growth Key Rural Service Centres G56.1 - Marham Land at the Street MAR1 - Marham Land south of The Street G112.1 - Watlington: Land south of Thieves Bridge Road	Although G56.1 has potential negative impacts on Economy B Food Production and Waste infrastructure, the SA commentary considers any impacts can be mitigated within the Plan, and allocations within Marham and Watlington are broadly positive overall.
Key Rural Service Centres – Part 1 G13.1 - Brancaster: Land to the east of Mill Road G13.2 - Brancaster Staithe and Burnham Deepdale: Land off The Close G22.1 - Castle Acre: Land west of Massingham Road G25.1 - Clenchwarton: Land between Wildfields Road and Hall Road G25.2 - Clenchwarton: Land north of Main Road G25.3 - Clenchwarton: Land south of Main Road G29.1 - Dersingham: Land north of Doddshill Road G29.2 - Dersingham: Land at Manor Road G30.1 - Docking: Land situated off Pound Lane G31.1 - East Rudham: Land off Fakenham Road	These sites are ‘carried forward’ from the SADMP and have not been assessed in greater detail. A few potential negative impacts for these sites were identified, particularly in relation to flood risk, landscape, climate change, waste infrastructure and Economy Food B. These impacts can be mitigated through policy wording and detailed assessments at the planning application stage.
Key Rural Service Centres – Part 2 G34.1 - Emneth: Land on south of The Wroe G35.1 - Feltwell: Land to the rear of Chocolate Cottage, 24 Oak Street G35.3 - Feltwell: Land at 40 Lodge Lane / Skye Gardens G43.1 - Great Massingham: Land south of Walcup’s Lane G41.1 - Gayton: Land north of Back Street Policy G41.2 - Grimston and Pott Row: Land adjacent Stave Farm, west of Ashwicken Road G47.1 - Heacham: Land off Cheney Hill G47.2 - Heacham: Land to the south of St. Mary’s Close	These sites are ‘carried forward’ from the SADMP and have not been assessed in greater detail. A few potential negative impacts for these sites were identified, particularly in relation to flood risk, landscape, climate change, waste infrastructure and Economy Food B. These impacts can be mitigated through policy wording and detailed assessments at the planning application stage.

Site Allocations	SA commentary and Scoring in relation to mitigation
G57.1 - Marshland St James Land adjacent to Marshland Saint James Primary School G57.2 - Marshland St James land adjacent 145 Smeeth Road	
Key Rural Service Centres – Part 3 G59.1 - Methwold: Land at Crown Street G59.2 - Methwold: Land at Herbert Drive G59.3 - Methwold: Land at Hythe Road G59.4 - Methwold: Land off Globe Street/St George’s Court G83.1 - Snettisham Land south of Common Road and behind Teal Close G85.1 - Southery: Land off Lions Close G88.1 - Stoke Ferry: Land South of Lark Road/Wretton Road G88.2 - Stoke Ferry: Land at Bradfield Place G88.3 - Stoke Ferry: Land at Indigo Road/Lynn Road	These sites are ‘carried forward’ from the SADMP and have not been assessed in greater detail. A few potential negative impacts for these sites were identified, particularly in relation to flood risk, landscape, climate change, waste infrastructure and Economy Food B. These impacts can be mitigated through policy wording and detailed assessments at the planning application stage.
Key Rural Service Centres – Part 4 G93.1 - Terrington St. Clement: Land at Church Bank, Chapel Road G93.2 - Terrington St. Clement: Land adjacent King William Close G93.3 - Terrington St. Clement: Land West of Benn’s Lane TSC1 - Terrington St. Clement: Land south of Northgate Way and west of Benn’s Lane G94.1 - Terrington St. John, St John’s Highway and Tilney St. Lawrence: Land east of School Road G104.1 - Upwell: Land north west of Townley Close G104.2 - Upwell: Land south/east of Townley Close G104.4 - Upwell: Land off St Peter’s Road G104.5 - Outwell: Land at Wisbech Road G104.6 - Outwell: Land Surrounding Isle Bridge G109.1 - Walpole St. Peter: Land south of Walnut Road G109.2 - Walpole St. Peter: Land south of Church Road	These sites benefit from planning permission or are existing allocations within the SADMP. The SA commentary conclusions support the allocation of these sites with appropriate updated policy wording to reflect the updated Sustainability Objectives and Site Sustainability Factors. A few potential negative impacts for these sites were identified, particularly in relation to flood risk, landscape, climate change, waste infrastructure and Economy Food B. These impacts can be mitigated through policy wording and detailed assessments at the planning application stage.
LP41 - Development in Rural Areas	The SA assessment did not identify any negative impacts for mitigation.

Site Allocations	SA commentary and Scoring in relation to mitigation
<p>Rural Villages – Part 1 G28.1 - Denver: Land south of Sluice Road G33.1 - East Winch: Land South of Gayton Road G36.1 - Fincham Land East of Marham Road G42.1 - Great Bircham and Bircham Tofts: Land adjacent to 16 Lynn Road G45.1 - Harpley: Land at Nethergate Street/School Lane G48.1 - Hilgay: Land South of Foresters Avenue G52.1 - Ingoldisthorpe: Land opposite 145 - 161 Lynn Road G72.1 - Runcton Holme: Land at School Road G78.1 - Sedgeford: Land off Jarvie Close H1 - Development of site allocated at Jarvie Close</p>	<p>These sites benefit from planning permission or are existing allocations within the SADMP. The SA commentary conclusions support the allocation of these sites with appropriate updated policy wording to reflect the updated Sustainability Objectives and Site Sustainability Factors. A few potential negative impacts for these sites were identified, particularly in relation to flood risk, landscape, climate change, waste infrastructure and Economy Food B. These impacts can be mitigated through policy wording and detailed assessments at the planning application stage</p>
<p>Rural Villages – Part 1 G81.2 - Shouldham: Land accessed from Rye’s Close G91.1 - Syderstone: Land West of No.26 The Street G97.1 - Tilney All Saints: Land between School Road and Lynn Road G106.1 - Walpole Highway: Land east of Hall Road G120.1 - Walton Highway: Land adjacent to Common Road G120.2 - Walton Highway: Land north of School Road G113.1 - Welney: Former Three Tuns / Village Hall G113.2 - Welney: Land off Main Street G114.1 - Wereham: Land to the rear of ‘Natanya’ Hollies Farm, Flegg Green G123.1 - Wiggenhall Street Germans: Land north of Mill Road</p>	<p>These sites benefit from planning permission or are existing allocations within the SADMP. The SA commentary conclusions support the allocation of these sites with appropriate updated policy wording to reflect the updated Sustainability Objectives and Site Sustainability Factors. A few potential negative impacts for these sites were identified, particularly in relation to flood risk, landscape, climate change, waste infrastructure and Economy Food B. These impacts can be mitigated through policy wording and detailed assessments at the planning application stage</p>
<p>Smaller Villages and Hamlets</p>	<p>Policy requires development in these areas to be consistent with the development plan. The implications and required mitigation for these policies are therefore considered to be already taken account of within the wider Local Plan, evidence base, assessments and SA.</p>