

King's Lynn and West Norfolk Sustainability Appraisal Addendum

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This report describes work commissioned by the Borough Council of King's Lynn and West Norfolk by an instruction dated 6 June 2024. JBA Consulting carried out this work.

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Abbreviations

ALC	Agricultural Land Classification
AONB	Area of Outstanding Natural Beauty
HRA	Habitat Regulations Assessment
NLA	National Landscape area (formerly AONB)
NPPF	National Planning Policy Framework
ODPM	Office of the Deputy Prime Minister
PPG	Planning Policy Guidance
PRoW	Public Right of Way
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment

Definitions

Term	Definition
Agricultural Land Classifications	The Agricultural Land Classification is part of the planning system in England and Wales – it provides a method for classifying agricultural land in six categories, or “grades” according to versatility and suitability for growing crops.
National Landscape area (formerly known as Area of Outstanding Natural Beauty)	<p>Areas of Outstanding Natural Beauty were formally designated under the National Parks and Access to the Countryside Act of 1949. They protect areas of the countryside of high scenic quality that cannot be selected for National Park status because of their lack of opportunities for outdoor recreation. Natural England is responsible for designating AONBs and advising the Government and others on how they should be protected and managed.</p> <p>Since November 2023, AONBs (including Norfolk Coast) have been known as National Landscape areas.</p>
Habitat Regulations Assessment	A process that determines whether the proposed strategy could significantly impact the designated features of protected European sites.
National Planning Policy Framework	The National Planning Policy Framework constitutes all policy statements and guidance documents into one document which forms a core part of the national planning system.
Planning Policy Guidance	Planning Policy Guidance Notes are statements of the Government’s national policy and principles towards certain aspects of the town planning framework.
Public Right of Way	A public right of way is a right by which the public can always pass along routes over land.
Strategic Environmental Assessment	A decision support process which aims to promote sustainable development by assessing the extent to which the emerging plan will help achieve relevant environmental, economic, and social objectives.

Non-Technical Summary

Introduction

The Borough Council of King's Lynn and West Norfolk (herein referred to as 'the Council') is currently undergoing examination for their Local Plan 2021-2040. The new Local Plan will incorporate the previous Core Strategy (CS) and Site Allocations and Development Management Plan (SADMP) into a single document plan. This Plan is intended to cover a period through up to 2040.

Plans such as the Council's Local Plan 2021-2040 are subject to a process called Sustainability Appraisal (SA). The SA assesses the potential social, environmental and economic effects of the plan's proposals together with other 'reasonable alternatives' considered by the Council.

Previous work in the Sustainability Appraisal process, including scoping, environmental reports and addendums was undertaken by Capita. This current addendum has been prepared by JBA Consulting to document the SA (including a Strategic Environmental Assessment (SEA)) of the most recent modifications (Main Modifications) to the Local Plan 2021-2040, as agreed through the examination process.

Purpose of this assessment

Under the Planning and Compulsory Purchase Act 2004, SA is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) (2004 SI 1633), known as the 'SEA Regulations'. These Regulations were originally transposed from the Strategic Environmental Assessment (SEA) Directive (European Directive 2001/42/EC), prior to the UK's departure from the EU.

The Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020 have modified several inspection requirements set out in the SEA Regulations that require responsible authorities to make physical copies of documents available for inspection at their principal office.

The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process, whereby the requirements of the SEA Regulations can also be met through a single integrated SA process. Therefore, the term 'SA' should be taken to mean 'SA incorporating the requirements of the SEA Regulations'.

Background to the Borough of King's Lynn and West Norfolk Local Plan 2021-2040

The current King's Lynn and West Norfolk Local Plan is comprised of two development plan documents, the Core Strategy (CS) and the Site Allocations and Development Management Policies Plan (SADMP), adopted in 2016. The current plan period extends from 2011 to 2026. The Local Plan 2021-2040 will consist of a single document to replace the CS and SADMP, this new Plan will cover a period from 2021-2040.

Once the Council finished preparing and consulting on the Local Plan, it was submitted for examination by the Planning Inspectorate. The examination process assesses whether the plan has been prepared in accordance with legal and procedural requirements and it is sound. During this process several changes were agreed and as part of the SA process, it is necessary to assess the potential sustainability impacts of these changes.

Summary of changes to Local Plan 2021-2040 (main modifications)

During examination, several changes to the proposed Plan were recommended, one of the more fundamental changes was the overarching Plan period. Originally, the Plan was intended to cover the period between 2016-2036, however, to comply with the national planning regulations a Plan should cover a minimum of 15 years from the expected date of adoption. Therefore, the amended Plan period now covers 2021-2040. In response to this longer timeframe, the housing requirement for the Plan period is higher.

Another fundamental change has been recommended for the key spatial strategy including the combination of LP01 and LP02 to one more comprehensive strategy covering the settlement hierarchy. In addition, there has been a removal of references to the Strategic Growth Corridor (SGC) as this does not reflect the spatial distribution of new development proposed in the Plan.

Other changes included separating out topics within the spatial strategy to have stand-alone policies on windfall sites and self and custom build housing. The new allocation of Bexwell Business Park also resulted in a new site allocation policy, and material changes to LP07 The Economy policy.

Policy LP20 Historic Environment has also been re-written in collaboration with Historic England, and the site allocation policy for West Winch Growth Area has been updated to include increased proposed dwelling allocation.

Summary of the Sustainability Appraisal process

Sustainability Appraisal is an iterative process that aims to identify the significant environmental, social and economic effects of a plan. For this Addendum, this involves assessing the updates to spatial strategies, policies and site allocations, to identify the extent to which sustainable development is likely to be achieved.

The SA has been prepared in accordance with the requirements of the SEA Regulations and follows good practice guidance produced by the Office of the Deputy Prime Minister (ODPM, 2004), Department for Communities and Local Government (DCLG, 2014), and Royal Town Planning Institute (RTPI, 2018).

This SA report assesses the sustainability performance of the updated policies and sites for this stage of Local Plan 2021-2040. This SA accompanies the previous SA reports including, Scoping (2020), Environmental Report (2020) and Addendum (2022).

SA Objectives

The SA Objectives are used to identify and evaluate the potential sustainability effects associated with the implementation of the Local Plan 2021-2040. The SA Objectives were developed by Capita at the Regulation 18 stage and have been carried forward throughout the following assessments. Acting as yardsticks of sustainability performance, the SA Objectives are designed to represent the topics identified in Schedule 2 of the SEA Regulations. There are 20 SA Objectives used in the assessment, as shown in Table 1 below.

Table 1: Sustainability Appraisal Objectives

SA Objective	
1	Minimise the irreversible loss of undeveloped Greenfield land, agricultural (Best Most Versatile Grade 1-3) land and productive agricultural holdings.
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 to characteristic habitats and species.
5	Avoid damage to protected sites and historic buildings.
6	Maintain and enhance the diversity and distinctiveness of landscape and townscape character.
7	Create places, spaces and buildings that work well, wear well and look good.
8	Reduce pollution and GHG emissions that affects the quality of land, air, water or soils in the borough including noise, light, vibrations.
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 adaption to 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.
12	Maintain and enhance human health.
13	Reduce and prevent crime and reduce fear of crime.

SA Objective	
14	Improve the quantity and quality of Green Infrastructure, publicly accessible open space, Public Rights of Way and access.
15	Improve the quality, range and accessibility of services and facilities (e.g. health, transport, education, training, leisure opportunities).
16	Redress inequalities related to age, gender, disability, race, faith, location and income.
17	Ensure all groups have access to decent, appropriate and affordable housing.
18	Encourage and enable to active involvement of local people in community activities.
19	Help people gain access to satisfying work appropriate to their skills, potential and place of residence.
20	Improve the efficiency, competitiveness and adaptability of the local economy.

The SA objectives reflect all subject areas to ensure that the assessment process is transparent, robust and thorough. The SA Objectives are strategic and can potentially be open-ended. Site sustainability Factors were developed to facilitate the assessment of site allocation policies, these are outlined in Table 2.

Table 2: Site Sustainability Factors

Ref.	Site Sustainability Factor	Includes positive and negative anticipated results in terms of, for example:
A	Access to services	Proximity to services; development providing supporting local services; availability of public transport to towns and such major service centres.
B	Community and Social	Local community support for proposals; provision of community facilities; provision of housing; especially types/tenures/mixes that meet community needs; neighbourhood plan promoted development; development contributing to healthy lifestyles.
C	Economy A: Business	Promotes economic development; creates supports employment.
D	Economy B: Food Production	Use of higher or lower grade agricultural land; development that involves/ supports food production.

Ref.	Site Sustainability Factor	Includes positive and negative anticipated results in terms of, for example:
E	Flood Risk	Development of land at different levels of flood risk; development type sensitivities.
F	Heritage	Conservation or enhancement of cultural heritage, including listed and other historic buildings, conservation areas and others of local distinction, archaeology, etc.
G	Highways and Transport	Relationship of development to transport networks, especially public transport; safety, free flow and efficiency of use of highway and other transport networks; transport infrastructure improvements and extensions; cycle and footway provision/ availability for practical access and reduction of car use.
H	Landscape Amenity	Conservation and enhancement of designated Norfolk Coast Area of Outstanding Natural Beauty and other distinctive landscapes; protection and improvement of local amenity (including visual/aural/olfactory).
I	Natural Environment	Biodiversity and geodiversity
J	Infrastructure, Pollution and Waste	Provision, protection and best use of infrastructure; avoidance of waste and pollution
K	Climate Change	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

Summary of SA findings

This SA Addendum has drawn upon the previous SAs undertaken by Capita throughout the development of the Local Plan 2021-2040. This assessment has sought to determine the impacts of the proposed main modifications on the overall conclusions of previous SA.

Upon adoption, the Plan will be accompanied by an Adoption Statement, which will outline proposed monitoring indicators most appropriate for future monitoring of the Plan in line with Regulation 16 of the SEA Regulations 2004.

Concluding statement

This SA Addendum has been conducted in line with the SEA Regulations. The appraisal shows that the changes as a result of the main modifications do not significantly alter the conclusions of the previous SA work undertaken. The Local Plan seeks to balance the social, economic and environmental expected impacts to meet the needs of the Borough.

1 Introduction

1.1 Background

The Borough Council of King's Lynn and West Norfolk (BCKLWN) is currently undergoing the Local Plan 2021-2040 examination. The examination started in early April 2022, shortly after the Plan was submitted to the Secretary of State (March 2022). The Local Plan 2021-2040 consists of one document which will replace the Core Strategy, and elements of the Site Allocations and Development Management Policies Document in setting out policies and proposals to guide future development.

Plans such as King's Lynn and West Norfolk Local Plan are subject to a process called Sustainability Appraisal (SA). The Sustainability Appraisal assesses the potential social, environmental and economic effects of the plan's proposals together with other 'reasonable alternatives' considered by the Council.

As a consequence of the Local Plan examination process, there have been several updates to Local Plan policies, and the removal of several allocated sites. This SA Addendum has been prepared by JBA Consulting to update the assessment of potential significant impacts in relation to the updated policies.

Several SA reports have been produced throughout the Plan making process by Capita, these are referenced throughout this report and include the following:

- SA Scoping Report (2017), followed by SA Scoping Report Update (2020)
- Draft SA Environmental Report (2019) followed by the final SA Environmental Report (2020)
- SA Addendum (2022)¹.

1.2 The Plan Area

The Borough of King's Lynn and West Norfolk covers approximately 500 square miles, and is predominantly rural in character. There are two market towns (King's Lynn and Downham Market) and Hunstanton, a Victorian coastal town. It is located approximately 100 miles north from London with a significant proportion of the borough designated as part of the Norfolk Coastal National Landscape. The previous Scoping Report (2017) and subsequent update (2020), identified a range of sustainability issues across the appraisal topics, including but not limited to:

- Increasing pressures on greenfield sites for development due to increasing population;
- Significant areas of the borough are vulnerable to flooding;
- Increased recreational pressures on the national and internationally designated ecological sites;
- Pressures from built development on landscape, townscape and archaeology;

¹ https://www.west-norfolk.gov.uk/info/20079/planning_policy_and_local_plan/629/sustainability_appraisal

- Need to consider future housing requirements for aging population;
- Need to raise educational attainment;
- Low level of economically active people due to small working age population.

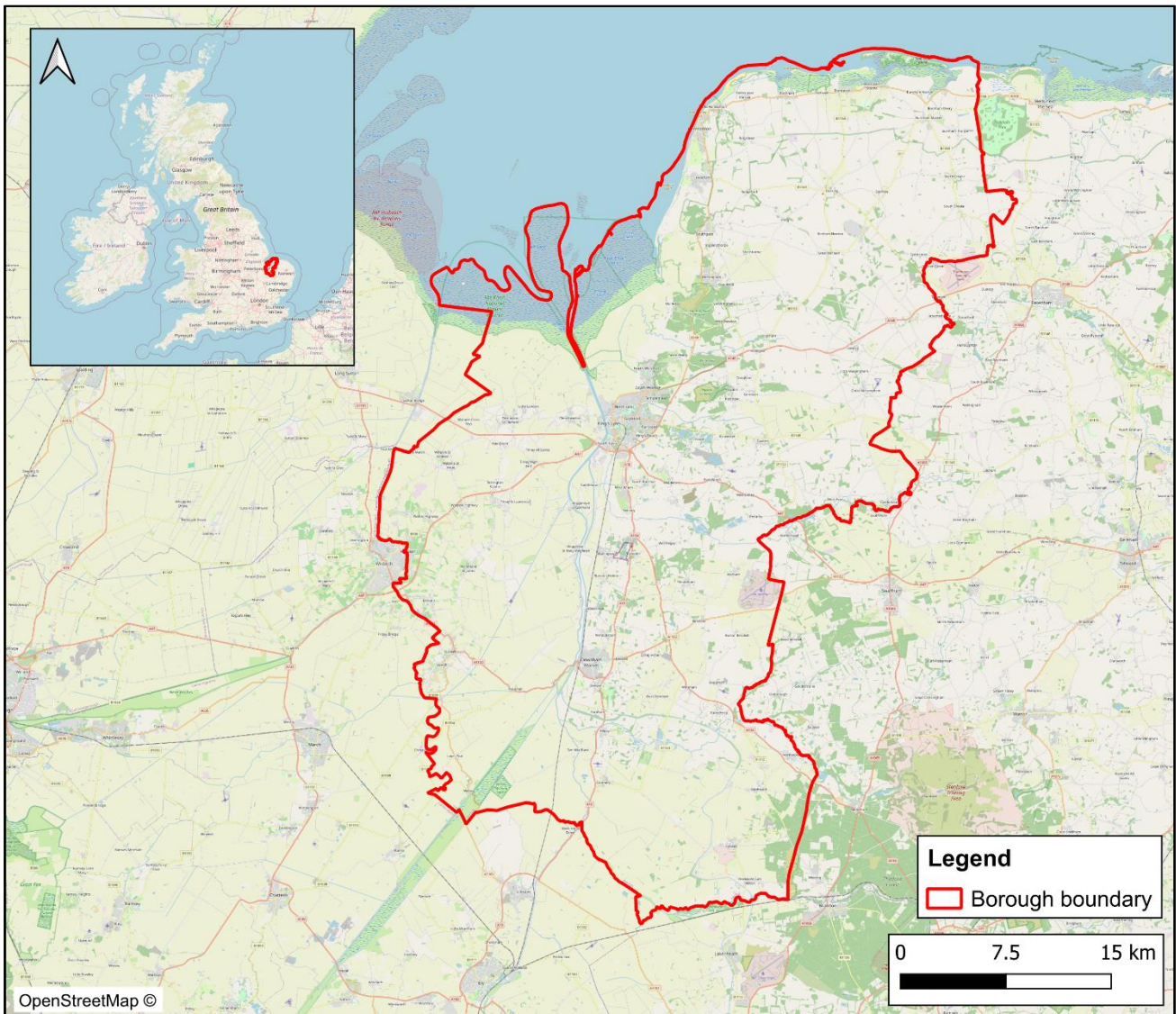


Figure 1-1: Borough of King's Lynn and West Norfolk

1.3 Purpose of this document

Following a series of recent examination hearings, several amendments have been made to the draft Local Plan document, in response to inspectors comments and removal of allocated sites which are either completed or undeliverable.

Therefore, this SA Addendum intends to update the conclusions of the previous SA Report (2020) to reflect the changes made to policies and site allocations.

1.4 King's Lynn and West Norfolk Local Plan (2021-2040)

The current King's Lynn and West Norfolk Local Plan is comprised of two development plan documents, the Core Strategy (CS) and the Site Allocations and Development Management

Policies Plan (SADMP), adopted in 2016. The current plan period extends from 2011 to 2026. The CS provides strategic guidance to growth and issues across the borough, it sets out the long-term growth strategy including the visions and objectives for the borough. The SADMP sets out the provision of land use allocations including housing and economic land to meet the long-term strategy set out in the CS.

The new Local Plan 2021-2040 is a single document prepared to supersede the CS and SADMP. The Local Plan covers a plan period from 2021 through to 2040. The review has been undertaken in relation to current and emerging plans for adjacent districts in the wider region. Once adopted, the Local Plan 2021-2040 will become the statutory development plan for the borough.

Once the Council finished preparing and consulting on the Local Plan, it was submitted for examination by the Planning Inspectorate. The examination process assesses whether the plan has been prepared in accordance with legal and procedural requirements (including Sustainability Appraisal) and it is sound. Following several discussions between the Inspectorate and the Council, the Inspectorate provided recommendations that are necessary to allow the Plan to be adopted. These are referred to as 'main modifications', a schedule of the necessary changes has produced by the Council. As part of the SA process, it is necessary to assess the potential significant impacts associated with these main modifications.

1.4.1 Summary of Main Modifications

One of the overarching modifications of the replacement Local Plan, is the Plan period, which has been extended to 2021-2040. To comply with Paragraph 22 of the National Planning Policy Framework (NPPF), the Plan period was extended to ensure a minimum 15-year Plan period from the anticipated date for adoption. As a consequence, the overall housing requirement for the Plan period would need to be amended. It was agreed during the examination period that the housing requirement should be based on the standard methodology for Local Housing Need (LHN) which for the borough is 554 dwellings per annum. Therefore, using this methodology the new housing requirement for the extended plan period is now 10,526 new dwellings.

The Spatial Strategy as set out in the submission Local Plan refers to the A10/ main rail line Strategic Growth Corridor (SGC) and Sustainable Development Locations. During examination, concern was expressed over the use of the SGC as there is no new growth proposed at Downham Market and Watlington other than those carried forward from the previous Local Plan. This was largely as a result of significant recent development in Downham Market, and lack of facilities to support further significant development. As a consequence, the Council agreed to remove the reference for SGCs, which would not change the substance of the plan but more accurately reflect the proposed allocations. The removal of SGCs also results in some consequential amendments to the settlement hierarchy. This includes removal of the "Growth Key Rural Services Centres" tier from the settlement hierarchy and merging this into the "Key Rural Service Centres" tier.

During examination, it was agreed to undertake a review of the settlement hierarchy, in light of the removal of SGC's and some concerns about the justification in the evidence base. The review found the majority of settlements in the submission Local Plan were appropriately designated with some amendments. The decision to remove reference to the Strategic Growth Corridor from the overall spatial strategy results in a very similar settlement tiers utilised in the previous Core Strategy.

There have also been some further updates to existing policies in the submission Plan, as follows:

- Policy LP07: The Economy - following discussions the Inspector recommended that the previously unallocated site at Bexwell should be included within the Plan as an allocated employment site.
- Policy LP20: Historic Environment Policy - through discussions with Historic England, significant amendments to the policy were agreed to strengthen the policy in respect of protecting the historic environment and ensure this is NPPF-compliant.
- Policy E2.1: West Winch Growth Area: - updates to the policy to increase the proposed allocation to 4,000 dwellings (2,030 within the Plan-period) and updates to site criteria following more detailed environmental assessments.

Several new policies have also been developed through this process, these include:

- New Policy: Residential development on windfall sites (to follow LP01) - Residential development on windfall sites: due to the reliance of windfall development, it was agreed this should be a standalone policy.
- New Policy: Neighbourhood Plans (to follow LP01) - this policy has been developed to reflect recent legislative changes including the Levelling-Up and Regeneration Act 2023 and updates to the NPPF since 2018, and the obligations now placed on local authorities in respect of neighbourhood planning.
- New Policy: Custom and Self-Build housing (to follow LP28) - this policy has been developed to reflect recent legislative changes including the Levelling-Up and Regeneration Act 2023 and the obligations now placed on local authorities to support custom and self-build housing.
- Policy F1.5 - New Bexwell Business Park employment land allocation (20ha) to the east of the A10 at Downham Market.

1.4.2 Habitat Regulations Assessment

Under the Conservation of Habitats and Species Regulations 2017 (as amended by the Conservation of Habitats and Species (amendment) EU (Exit) Regulations 2019) land-use plans are subject to Habitat Regulations Assessment (HRA). The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of European sites and to ascertain whether it would adversely affect the integrity of those sites. European sites comprise Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and under UK Government Policy, Ramsar sites.

The Local Plan 2021-2040 at pre-submission was subjected to an appropriate assessment and integrity test according to the statutory provisions laid out in the Habitats Regulations 2017. This was prepared by Footprint Ecology on behalf of the Council.

The findings indicate that through implementing appropriate mitigation (as agreed with Natural England) it will be possible to conclude that the replacement Local Plan would not cause any adverse impacts on site integrity. An updated HRA addendum has been prepared by Footprint Ecology as part of this Local Plan 2021--2040 in line with updates as part of Examination. The addendum has concluded there are no further significant impacts expected from the changes.

1.5 Structure of this report

This SA Addendum is structured into the following sections:

- Chapter 2 summarises the methodology used to carry out this SA update, including the SA objectives and Site Sustainability Factors used to assess the updated policies, as well as any difficulties encountered in applying the methodology.
- Chapters 3 to 4 describe the results of the SA of the amended policies and updated site allocations.
- Chapter 5 describes the sustainability effects of the Plan cumulatively.
- Chapter 6 describes the next steps in the SA process.

2 Sustainability Appraisal Methodology

2.1 The Sustainability Appraisal process

Sustainability Appraisal is an iterative process that aims to identify the significant environmental, social and economic effects of a plan. For this SA Addendum, this involves assessing the updated spatial strategies and policies, as well as any reasonable alternatives considered, to identify the extent to which these changes change the overall conclusions of the previous SA Environmental Report (2022) and whether sustainable development is likely to be achieved.

This SA Addendum has been prepared in accordance with the requirements of the SEA Regulations and follows good practice guidance produced by the Office of the Deputy Prime Minister (ODPM, 2004), Department for Communities and Local Government (DCLG, 2011), and Royal Town Planning Institute (RTPI, 2018)

2.1.1 Meeting legal requirements

Sustainability Appraisal is a compulsory requirement for Local Plans under Section 19 of the Planning and Compulsory Purchase Act 2004. This has since been amended by the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 to ensure it functions effectively following the UK's exit from the EU.

Government guidance requires that SA incorporate the requirements of the SEA Regulations; in practice, SA and SEA follow similar methodologies and it is possible to combine them without losing the essence of either.

2.2 Sustainability Appraisal Objectives

The previous SA Scoping Report (2020) undertaken by Capita provided a review of the baseline environment across the borough, and identified a series of sustainability issues. A series of Sustainability Appraisal Objectives have been developed to be used as yardsticks of sustainability performance of the Local Plan. The Objectives aim to address the identified issues and conform with relevant policy, plans and programmes.

Table 2-1: Sustainability Appraisal objectives and topics

SA Topic	SA Objective
Land and water resources	<p>Minimise the irreversible loss of undeveloped Greenfield land, agricultural (Best Most Versatile Grade 1-3) land and productive agricultural holdings.</p> <p>Limit water consumption to levels supportable by natural processes and storage systems.</p>
Biodiversity and Geodiversity	<p>Maintain, restore and enhance the natural environment and sites designated for biological and geological interest.</p> <p>Maintain and enhance the range, functionality and connectivity to characteristic habitats and species.</p>
Landscape and Townscape	<p>Avoid damage to protected sites and historic buildings.</p> <p>Maintain and enhance the diversity and distinctiveness of landscape and townscape character.</p> <p>Create places, spaces and buildings that work well, wear well and look good.</p>
Climate change and pollution	<p>Reduce pollution and GHG emissions that affects the quality of land, air, water or soils in the borough including noise, light, vibrations.</p> <p>Minimise waste production, reduce the use of non-renewable energy sources and support the recycling of waste products.</p> <p>Minimise vulnerability and provide resilience and adaption to climate change, taking account of flood risk and coastal change.</p> <p>New development should be designed to be better adapted to climate change and flood risk.</p>
Healthy communities	Maintain and enhance human health.

SA Topic	SA Objective
	<p>Reduce and prevent crime and reduce fear of crime.</p> <p>Improve the quantity and quality of Green Infrastructure, publicly accessible open space, Public Rights of Way and access.</p>
Inclusive communities	<p>Improve the quality, range and accessibility of services and facilities (e.g. health, transport, education, training, leisure opportunities).</p> <p>Redress inequalities related to age, gender, disability, race, faith, location and income.</p> <p>Ensure all groups have access to decent, appropriate and affordable housing.</p> <p>Encourage and enable to active involvement of local people in community activities.</p>
Economic activity	<p>Help people gain access to satisfying work appropriate to their skills, potential and place of residence,</p> <p>Improve the efficiency, competitiveness and adaptability of the local economy.</p>

The SA Objectives were originally developed by Capita in the Scoping Report undertaken in 2017. During consultation on this document several representations were made from statutory consultees on the proposed SA Objectives. These comments were taken into consideration and resulted in the addition of new SA Objectives, featured in the SA Scoping Report update undertaken in 2020. Further consultations were undertaken following this publication, however no further amendments were made.

The SA methodology undertaken throughout the subsequent stages of the Local Plan 2021-2040 were considered as part of the ongoing examination with no further modifications, indicating that the inspector considered the methodology appropriate for Sustainability Appraisal. Therefore, the SA Objectives in this Addendum remain consistent with those applied in the previous SA reports produced by Capita.

2.3 Site Sustainability Factors

The previous SA Environmental Report (2022) developed 11 Site Sustainability Factors to assess the sustainability of proposed sites. At the Scoping stage, 10 factors were proposed, however following representations during consultation an additional factor was added relating to climate change. The factors were used to score sites and then assess the combined anticipated effects of the selected sites. The scoring of options against these

factors is intended to give only a broad indication of its performance against the SA Objectives.

Table 2-2: Site Sustainability Factors

Ref.	Site Sustainability Factor	Includes positive and negative anticipated results in terms of, for example:
A	Access to services	Proximity to services; development providing supporting local services; availability of public transport to towns and such major service centres.
B	Community and Social	Local community support for proposals; provision of community facilities; provision of housing; especially types/tenures/mixes that meet community needs; neighbourhood plan promoted development; development contributing to healthy lifestyles.
C	Economy A: Business	Promotes economic development; creates supports employment
D	Economy B: Food Production	Use of higher or lower grade agricultural land; development that involves/ supports food production.
E	Flood Risk	Development of land at different levels of flood risk; development type sensitivities.
F	Heritage	Conservation or enhancement of cultural heritage, including listed and other historic buildings, conservation areas and others of local distinction, archaeology, etc
G	Highways and Transport	Relationship of development to transport networks, especially public transport; safety, free flow and efficiency of use of highway and other transport networks; transport infrastructure improvements and extensions; cycle and footway provision/ availability for practical access and reduction of car use
H	Landscape 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

Ref.	Site Sustainability Factor	Includes positive and negative anticipated results in terms of, for example:
K	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 2-3, shows the relationship between the Site Sustainability Factors and the SA Objectives. Within the table, where relationship between factor and objective is 'Strong' this has been denoted with an 'S' and where moderate, it has been denoted with an 'M',

Table 2-3: The relationship between Site Sustainability Factors and Sustainability Objectives

		Site Sustainability Factors										
Local Plan Sustainability Objectives		A	B	C	D	E	F	G	H	I	J	K
1	Minimise the irreversible loss of undeveloped Greenfield land, agricultural (Best Most Versatile Grade 1-3) land and productive agricultural holdings.				S		M		S	S		M
2	Limit water consumption to levels supportable by natural processes and storage systems.					M				S	S	M
3	Maintain, restore and enhance the natural environment and sites designated for biological and geological interest.								M	S	S	M
4	Maintain and enhance the range, functionality and connectivity to characteristic habitats and species.								M	S		
5	Avoid damage to protected sites and historic buildings.			M			S		M			
6	Maintain and enhance the diversity and distinctiveness of landscape and townscape character.						S		S	M		
7	Create places, spaces and buildings that work well, wear well and look good.	M	M	M		M	M	M	M		M	M
8	Reduce pollution and GHG emissions that affects the quality of land, air, water or soils in the borough including noise,	M						M/S	S	S	S	S

		Site Sustainability Factors										
	light, vibrations.											
9	Minimise waste production, reduce the use of non-renewable energy sources and support the recycling of waste products.	M								M	S	S
10	Minimise vulnerability and provide resilience and adaption to climate change, taking account of flood risk and coastal change.		M	M	M	S		M			M	S
11	New development should be designed to be better adapted to climate change and flood risk.		M	M		M			M	M	M	M
12	Maintain and enhance human health		S									M
13	Reduce and prevent crime, and reduce the fear of crime		S									
14	Improve the quantity and quality of Green Infrastructure, publicly accessible open space, Public Rights of Way and access	S	S						S			S
15	Improve the quality, range and accessibility of services and facilities (e.g. health, transport, education, training, leisure opportunities)	S		M								M
16	Redress inequalities related to age, gender, disability, race, faith, location and income	S	S									

		Site Sustainability Factors											
17	Ensure all groups have access to decent, appropriate and affordable housing	M	S							S			M
18	Encourage and enable the active involvement of local people in community activities		S										M
19	Help people gain access to satisfying work appropriate to their skills, potential and place of residence		S	S									
20	Improve the efficiency, competitiveness and adaptability of the local economy			S									

2.4 Assessing impact significance of options, policies, and sites

For the purposes of site assessment, the following Site Sustainability Factor Scoring guide was developed to establish a methodology for ascribing significance of impact for sites on factors. Table 2-4 and Table 2-5 show this guide, developed in the previous SA Environment Report (2022).

Table 2-4: The Site Sustainability Factor Scoring Guide (1/2)

Impact Score	Site Sustainability Factor					
	A	B	C	D	E	F
Highly positive (++)	Good access to a wide range of services	Strong community support. The community benefits from the site i.e. housing/mixed communities/ quality/ facilities	Highly positive permanent contribution to the economy, jobs, business opportunities			
Positive (+)	Good access to a range of service	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 jobs, business opportunities	Grade 6 Urban/ Previously Developed land / Non-agricultural	Flood Zone 1	Proven to enhance heritage
Neutral (O)		No comments received. Site would deliver minimal benefits to the community	Site would deliver minimal/ no real benefit to the economy	Grade 4 or 5		No heritage impact
Positive/ Negative (+/-)						
Unknown (?)		Unknown impact	Unknown impact	Unknown grade	Unknown zone	Unknown impact

Impact Score	Site Sustainability Factor					
	A	B	C	D	E	F
Highly positive (++)	Good access to a wide range of services	Strong community support. The community benefits from the site i.e. housing/mixed communities/ quality/ facilities	Highly positive permanent contribution to the economy, jobs, business opportunities			
Dependant on implementation (#)	Development is of scale that could deliver a great range of service	Site details negotiable - may deliver some community benefits				Within or immediately adjacent to Conservation Area
Negative (-)	Poor access to a range of services	Some community objections - the scheme delivers minimal benefits	Overall negative impact to the economy, jobs, business opportunities	Grade 3	Flood Zone 2	
Highly negative (--)	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 Zone 3 / Tidal Hazard Zone	Irreversible loss of heritage asset or permanent negative impact on setting

Table 2-5: The Site Sustainability Factor Scoring Guide (2/2)

Impact Score	Site Sustainability Factor				
	G	H	I	J	K
Highly positive (++)	Site would deliver better transport links for the community		Improves natural environment	Site is for local and national infrastructure	Strong emphasis on green design and proof of new development taking a strong lead in adapting and mitigating climatic impacts
Positive (+)	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)		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 (+/-)					Strong community/political objection but the site shows a strong emphasis on green design and reducing climatic issues

Impact Score	Site Sustainability Factor				
	G	H	I	J	K
Unknown (?)	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 (#)	Site suitable subject to safe access etc. (NCC Highways Authority)	Potential negative impacts but this could be mitigated through the design of the scheme	Potential negative impact which could be mitigated	Some minor issues but also solutions provided	Site details still negotiable. Potential positive or negative impact on reducing climatic impact within the borough
Negative (-)	Inadequate footpath to the school/ generally 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 (--)	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

2.4.1 Limitations and difficulties encountered

SA is a useful exercise in identifying and balancing potential environmental and socio-economic effects against each other. However, it does not represent the entire analysis required to determine the acceptability of plan objective or policy and even where one policy scores positively in terms of sustainability, it may not be appropriate for other reasons.

SA is a desk-based exercise carried out to report the generic potential sustainability effects of implementing the plan. SA is a strategic level assessment and therefore, does not contain as much detail as site specific EIA that might accompany a specific development proposal.

Inevitably, a degree of professional judgement has been required in undertaking the policy appraisals to determine the 'significance' of effects based on the baseline data available and likely evolution of the baseline.

3 SA Findings for updated Plan Policies

3.1 Introductions

The Local Plan 2021-2040 has been developed in the context of current and emerging plans for adjacent districts and wider region to align with a wide range of plans and programmes. There are a number of different types of policies within the Local Plan 2021-2040, including:

- Non-site-specific policies, including strategic policies and development management policies these are high level policies which guide and shape development such as the settlement hierarchy and topic-based policies.
- Strategic area-specific designations; e.g. coastal change management area, Norfolk Coast National Landscape area.
- Settlement specific policies, these include:
 - Allocation policies of land for specific development
 - Guidance for the evolution of areas including town centre
 - Development boundaries, illustrating geographically where principal of development will be permitted.

3.2 Scope of assessment

As described in Section 1.4.1, as part of the examination process, there have been several changes to the overarching spatial strategy, and several changes to wider policies relating to the historic environment, and the economy.

A comprehensive screening exercise has been undertaken to identify which policy amendments require reappraisal, this can be found in Appendix A. Policy amendments which have had material consequences to the outcomes of the policy have been re-

appraised. Where amendments have re-iterated requirements which would be usually enforced through planning obligations, or included minor re-wording, these have not been assessed as part of this Addendum. Table 3-1 summarises the policy amendments screened to require re-appraisal in this SA Addendum.

Table 3-1: Screening policy amendments for re-assessment within SA Addendum

Policy Ref.	Description of changes	Need for re-appraisal
LP01: Spatial Strategy Spatial Strategy	Deletion of Policy LP01 and replacement with new policy LP01, as set out in Topic Paper Spatial Strategy and Settlement Hierarchy (August 2023), with some further amendments arising through the Local Plan examination hearings (March/ April 2024). New spatial policy in line with previous Core Strategy, also incorporating the Settlement Hierarchy, replacing Policy LP02.	Yes - material changes to the Local Plan 2021-2040
LP07: The Economy	Clarification on the requirement of Habitat Regulations Assessments. Removal of outdated references and cross-referencing other policies. Update of Plan period. Update in line with newly allocated employment site Bexwell Business Park. Text amendment to provide positive approach to proposals for alternative uses of employment land for consistency with NPPF	Yes - due to material changes brought from new employment site allocation.
LP20: Environmental Assets - Historic Environment	Whole policy re-written in collaboration between Local Planning Authority and Historic England.	Yes
E2.1 West Winch Strategic Growth Area	Several material changes to the policy including additional criteria for preventing traffic impacts, green infrastructure, SuDS, heritage assessment, noise and ecological assessment. Revised dwelling figures to be delivered in Plan period.	Yes
F1.5 - Bexwell Business Park (BEX)	New employment land allocation (20ha)	Yes
New Policy: Neighbourhood plans	New policy and supporting text around guidance of Neighbourhood Plans.	Yes
New Policy: Custom and Self-	New policy in support of custom and self-built housing.	Yes

Policy Ref.	Description of changes	Need for re-appraisal
Build Housing		

3.3 Policy Assessment

The following section presents an assessment of each policy to support its inclusion within the Plan. As described above, this assessment only includes policy amendments which have been screened as requiring re-appraisal. Policies have been assessed in line with the methodology set out in Section 2, as developed by Capita and utilised in previous SA reports associated with this Local Plan 2021-2040. No further assessment of reasonable alternatives has been assessed within this Addendum, an assessment of reasonable alternatives can be found in the SEA Environmental Report (2020). Whilst the assessment methodology applied is consistent with the previous iterations of the Sustainability Appraisal, it is important to note that in some instances professional judgement has been applied and this may differ from previous consultants' work on the basis of available evidence and information. For example, in this assessment where policies promote development, a negative score has been applied as broadly development will result in increased GHG emissions unless where explicitly stated otherwise.

The overarching score for each assessment has been calculated based on the addition of the negative and positive scores.

3.3.1 LP01: Spatial Strategy

Policy LP01 constitutes the overall spatial strategy of the Plan, the policy identifies the aspiration to distribute the majority of growth within the most sustainable locations of Kings Lynn, Downham Market and Hunstanton. This makes the most of existing services, and opportunities for regeneration and infrastructure improvements. The policy also includes the promotion of a major sustainable growth area to the south east of King's Lynn, West Winch Growth Area. This is, by far, the most significant site allocation in the Plan.

The policy recognises the need for rural areas to grow appropriately to maintain rural vitality. The distribution of growth across the settlements has been informed by the settlement hierarchy, determining the overall level of growth for the Borough, and distribution of growth with individual tiers of the settlement hierarchy. Each tier of the hierarchy reflects the settlement/ area's role, including range of services, proximity and functional relationships between settlements, accessibility by public transport, infrastructure capacity, and ability to expand to accommodate the needs generated by new development.

The settlement hierarchy is as follows:

- Tier 1: King's Lynn Sub Regional Centre (including West Winch Growth Area)
- Tier 2: Main Towns

- Tier 3: Settlements adjacent to King's Lynn and the main towns
- Tier 4: Key Rural Service Centres
- Tier 5: Rural Villages
- Tier 6: Smaller Villages and Hamlets

The policy also sets out how the Local Housing Need (LHN), has been calculated using the Standard Method as per the NPPF and Planning Practice Guidance (PPG). This provides a figure of 554 new homes per year, over the 19-year Local Plan period, this provides an overall need of 10,526 new homes. The Employment Land 2021-2040 2017 (ELR) identified a high supply of employment land, this equates to at least 13,000 new jobs, Policies LP07-LP10 provide a detailed framework regarding managing development for proposed employment and retail uses in the Borough. Windfall development, sites which will come forward which are not site-specific development plan allocations, have also been accounted for over the Plan period, accounting for 3,081 of housing supply. This has been calculated on a basis consistent with NPPF and PPF.

Table 3-2: SA Assessment of LP01

LP01: Spatial Strategy																				
SA Objectives																			Overall Effect	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19		20
-	-	0	0	0	+	+	-	-	0	0	0	0	0	+	0	+	0	+	+	+2

LP01 largely focuses on the location of new development across the larger existing settlements, with some distribution across the other tiers in the settlement hierarchy. The policy has scored positively for objectives which relate to access to services, public transport, infrastructure capacity and landscape and townscape as a result of the methodology used in the settlement hierarchy. Broadly, development is likely to result in some residual (albeit limited) increase of Greenhouse Gas (GHG) emissions, water consumption and waste production, therefore scoring negatively for these policies. The policy does not consider the enhancement of biodiversity and environment, flood risk, and wider social objectives, thus scoring neutral for these objectives. These topics, however, are tackled in subsequent policies in the Local Plan 2021-2040. Overall, the assessment concludes that the spatial strategy is likely to have an overall positive score in relation to the SA objectives.

3.3.2 LP07: The Economy

Policy LP07 details the employment land allocations within the Local Plan 2021-2040 across the key areas of King's Lynn, Downham Market and Hunstanton. The policy includes support for proposals for alternative uses of employment land where it can be demonstrated that using the site for employment purposes gives rise to unacceptable environmental or accessibility problems including sustainable transport, or alternative use offers greater potential benefits to the community. The policy also supports the rural economy and diversification through a rural exception approach within the countryside, and expansion for opportunities in innovation, skills and training.

LP07: The Economy																				
SA Objectives																			Overall Effect	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	
+	-	0	0	0	0	0	-	-	0	0	0	0	0	+	0	0	0	++	++	+3

The policy references the protection of premises currently or last used for employment purposes including agricultural purposes unless specific criteria is met, therefore scoring positively for the protection of agricultural land. Broadly the policy does not refer to ecological sites or habitats and species, historical environment, or landscape therefore, it has scored neutrally in these areas. Similarly, the policy does not cover flood risk requirements, health, inequality, housing, crime or improving green infrastructure or PRow's, therefore scoring neutrally on these factors. Positive impacts have been recorded for objectives relating to training, education, access to work and the local economy due to the policies support of employment sites and expansion of opportunities for innovation, skills and training. Finally, as the policy promotes new development including on agricultural land, the policy has scored negatively for both GHG emissions and water consumption.

3.3.3 LP20: Historic Environment Policy

Policy LP20 (with supporting text) has been comprehensively revised by the Borough Council (with advice/ input from Historic England), to bring it into line with the NPPF. It outlines the role of the Borough's historic environment for its contribution to a high-quality environment and as an important resource in bringing social, cultural, economic and environmental benefits to the community. The policy states the requirement to protect heritage assets and the historic environment from inappropriate development to sustain, and where appropriate enhance their significance, including putting heritage assets into uses consistent with their conservation. The policy covers the importance

of both designated and non-designated heritage assets. The Council will continue with the programme Conservation Area Character statements, providing information about the Conservation area including its origins and historical development to be used as a material consideration when assessing planning applications. Overall, the policy details the requirements for any development which may have impacts on the historic environment and heritage assets within the Borough.

LP20: Historic Environment Policy																				
SA Objectives																			Overall Effect	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19		20
0	0	0	0	++	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+3

This policy sets out criteria for which development proposals should adhere to in regard to protecting and enhancing heritage assets and the wider historic environment. Therefore, a major positive impact on historic environment would be anticipated (SA Objective 5). Through protecting heritage assets and their setting within the Plan area, this policy would be also likely to have a minor positive impact on the local landscape character.

3.3.4 New Policy: Residential development on windfall sites (to follow LP01)

The new windfall development policy replaces policies LP04, LP31 and LP41 from the submission Plan, each of which was fully assessed through the pre-submission Sustainability Appraisal.

It makes the provision for some development outside of, but adjoining, development boundaries of the most sustainable settlements (Tier 1-4), provided certain criteria are met. Windfall development can also take place in Tier 5 and 6 settlements; however, these should normally be confined to sites within the development boundaries. This is intended to protect smaller villages from over development, promote local choice, and protect their character and distinctiveness.

Furthermore, it would not prevent Neighbourhood Plans allocating sites for residential development outside the development boundaries. The policy places criteria on windfall developed within boundaries including sustainable design of development, housing that supports the needs of the community, avoids significant impacts on services and infrastructure, contributes to local environment

and landscape setting, avoids significant impacts on highways and maximises opportunities to reduce the need to travel and encourages sustainable and active travel.

The policy also includes specific additional criteria for residential development outside of development boundaries which includes respecting or enhancing the character of adjoining settlements, supported by existing and future services, not within the Norfolk Coast National Landscape or adverse impacts on setting, preserves or enhances the significance of heritage assets and their settings, and maintains physical separation of existing settlements and protect their identity.

The policy places certain thresholds on the number of dwellings which can be brought forward through windfall development. Where in excess of these figures, outside of development boundaries by adjoining, the development boundary must be brought forward as allocations through the Local Plan or Neighbourhood Plan.

In Tiers 5 and 6 of the settlement hierarchy, residential development will not be supported outside development boundaries where allocated through the Local Plan or a Neighbourhood Plan. Some small scale development of up to five dwellings will be considered where necessary, and where Neighbourhood Plan does not address through allocations and not within development boundaries. This recognises the differing characteristics, roles and functions of rural settlements and the need to direct development towards the most sustainable locations.

Table 3-3: SA Assessment of New windfall developments policy

New Policy: Residential development on windfall sites																				
SA Objectives																			Overall Effect	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	
-	-	+	0	+	+	+	-	-	0	0	+	0	0	+	0	+	+	0	0	+ 4

Overall, the policy provides a series of criteria for windfall residential development which largely supports the SA objectives including criteria on the protection of local environment, provision of services, and conservation of settlement characteristics. The site criteria, however, do not consider wider social issues including fear of crime, or engagement in community activities, thus scoring neutral. For

objectives relating to water consumption, waste and GHG emissions the policy does not directly deal with these issues and as development is likely to result in increased pressures on this objective they have scored negatively.

3.3.5 New Policy: Neighbourhood Plans (to follow LP01)

The new Neighbourhood Plan policy enables communities to produce their own policies and to allocate sites for development through the Neighbourhood Plan process. The policy states the Council will support the production of Neighbourhood Plans to identify appropriate, locally specific policies which are in conformity with the strategic policies of the Local Plan. Where Neighbourhood Plans seek plans for housing growth, the policy sets out minimum housing requirements for Neighbourhood Plan Areas. For monitoring purposes, Neighbourhood Plan development land allocations would be treated as windfall development, as opposed to "planned growth". Planned growth is represented by Local Plan allocations, to deliver the strategic housing requirement set out in LP01.

Table 3-4: SA Assessment of New Neighbourhood Plans policy

New Policy: Neighbourhood Plans																				
SA Objectives																			Overall Effect	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19		20
0	0	0	0	0	+	+	0	0	0	0	0	0	0	+	0	0	+	0	0	

The new Neighbourhood Plans policy has largely scored neutrally across the majority of SA Objectives, as whilst the ability of Neighbourhood plans can facilitate the ability of policies specific to the local environment. However, this cannot be guaranteed. The policy has scored positively in relation to creating places that work well, and provision and accessibility of services.

3.3.6 New Policy: Custom and Self-Build housing (to follow LP28)

The new Custom and Self-Build (C&SB) policy refers to the definition of a custom or self-build housing in addition for the requirement for local authorities to keep a register of individuals and associations of individuals who are seeking to acquire plots of land for this purpose in the local authority's area. The policy states the support of this type of development through the creation of a Task Group and published Custom and Self-Build Action Plan.

New Policy: Custom and Self-Build housing																				
SA Objectives																			Overall Effect	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19		20
0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	+	0	+	+	+4

This policy will have a neutral impact on most Objectives as they do not interact. However, it performs well against policy 7 to create buildings that work well, wear well and look good. The policy should help ensure people have access to decent housing, help people gain access to place of residence, and improve the local economy. Therefore, it also performs well against Objectives 17, 19 and 20.

4 Site Assessments

4.1 Introduction

As part of this SA Addendum, two sites and associated policies have been assessed using the Site Sustainability Factors developed in the SA Environmental Report (2022). 26 sites have been removed from the Local Plan 2021-2040 as they are now no longer feasible or (in many cases) have largely been delivered, these are listed in Table 4-1.

The following section provide an updated site assessment for the following sites:

- E2.1 West Winch Growth Area: significant changes to policy criteria from submission version, predominantly to ensure these are robust and can contribute towards sustainable development)
- F1.5 - Downham Market, Bexwell Business Park (BEX): new 20ha site allocation, reflecting an extant planning permission

Table 4-1: Site allocation policies removed from the submission Local Plan 2021-2040

Ref.	Name
E1.11	King's Lynn – Southgates
E1.15	West Lynn – Land at Bankside
F2.4	Hunstanton – Land north of Hunstanton Road
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
G25.3	Clenchwarton – Land south of Main Road
G29.2	Dersingham – Land at Manor Road
G30.1	Docking – Land situated off Pound Lane (Manor Pasture)
G33.1	East Winch – Land south of Gayton Road
G34.1	Emneth – Land on south of The Wroe
G35.3	Feltwell - Land at 40 Lodge Lane / Skye Gardens
G41.2	Grimston and Pott Row – Land adjacent Stave Farm, west of Ashwicken Road
G45.1	Harpley – Land at Nethergate Street/School Lane
G47.2	Heacham – Land to the south of St. Mary's Close
G52.1	Ingoldisthorpe – Land opposite 143-161 Lynn Road
G57.1	Marshland Saint James – Land adjacent to Marshland Saint James Primary School

Ref.	Name
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
G72.1	Runcton Holme – Land at School Road
G81.2	Shouldham – Land accessed from Rye’s Close
G83.1	Snettisham – Land south of Common Road and behind Teal Close
G85.1	Southery – Land off Lions Close
G91.1	Syderstone – Land west of no. 26 The Street
G93.1	Terrington St. Clement – Land at Church Bank, Chapel Road
G93.2	Terrington St. Clement – Land Adjacent King William Close
G97.1	Tilney All Saints – Land between School Road and Lynn 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
G109.2	Walpole St. Peter – Land south of Church Road
G114.1	Wereham – Land to the rear of ‘Natanya’, Hollies Farm, Flegg Green, Wereham
G120.1	Walton Highway – Land adjacent Common Road

4.2 Revised site assessment

4.2.1 Policy E2.1 West Winch Growth Area

Table 4-2 shows the revised site assessment to Policy E2.1, which allocates a 192ha site located to the south-east of King’s Lynn and includes parts of the parishes of West Winch and North Runcton. It makes provision for 2,030 homes within the plan period to 2040, with 4,000 new homes planned overall. The aim of the strategic growth area is to integrate a large number of new homes and associated facilities with the existing village community, create a range of major improvements such as a new housing access road along the eastern boundary of the site, and promotes a sense of community among the existing and new residents.

Table 4-2: SA Assessment of Policy & Site E2.1

Revised site assessment: E2.1 West Winch Growth Area												
Site Ref.	Site Sustainability Factor											Overall Effect
	A Services Access	B Community & Social	C Economy Business	D Economy Food	E Flood Risk	F Heritage	G Highways & Transport	H Landscape Amenity	I Natural Environ	J Infrastructure, Pollution & Waste	K Climate Change	
E2.1	++	+	+	--	+	?	+	+	+	+	+	+8

A highly positive impact on Factor A is anticipated due to the proximity of the site to King's Lynn which will provide residents with a wide range of services. Factor B performs well as the community will benefit from the mix of facilities, housing densities and types, and affordable housing.

The site is within Flood Zone 1. Nonetheless, the policy includes criteria that must be met for the development to be approved, which includes flood risk assessments and the incorporation of Sustainable Drainage Systems (SuDS). Strategic transport assessments and traffic impact thresholds and high standards of design are also a requirement of Policy E2.1. Through these measures, a positive impact on Site Suitability Factors E and K are anticipated, and a positive impact on Factor G, particularly through the inclusion of a new link road between the A10 and A47 to provide access and release traffic pressure. The latter is necessary to enable all but the earliest development phases (up to the first 300 dwellings) to come forward.

Maintaining connectivity is vital to achieving links and integration between new residents and business and can contribute to a healthy community and economy. Another positive impact is the provision of a network of cycle and pedestrian routes (including links to King's Lynn town centre).

A positive impact is expected on Factor C as the new housing should contribute to revitalising the local economy and encourage jobs and business opportunities in Kings Lynn and the surrounding area.

The site is on Grade 2/3 Agricultural Land therefore a significant negative impact on Factor D is anticipated through the loss of Best and Most Versatile land as a result of the policy.

A positive impact on Factor I is expected through the policy's criteria for habitat protection measures and other ecological protections, mitigation and enhancement measures. There are listed buildings within West Winch and North Runcton on either side of the site and the development could have an impact on the setting of these assets. Therefore, an unknown impact on Factor F has been given, although it should be noted that revisions to the site allocations proposals were necessary to bolster the historic environment as agreed with Natural England². The policy makes provision for a Heritage Assessment so any impact on will be heritage considered and associated mitigations should be incorporated into the site's design.

The landscape and townscape will be altered to accommodate up to 4,000 new homes, associated infrastructure, such as the new road, and services to support the increased population. However, the various measures included in the policy, as outlined in this section, will also have indirect positive impacts on the landscape, such as the ecological enhancements, and the policy makes provision for green infrastructure which will also help integrate the development into the landscape. Through good design and sensitivity to local character and amenity of the existing area, an overall positive impact on Factor H is anticipated.

Considering Factor J, an increase in housing will result in an increase in waste production, energy and water use. Due to the scale of the development, the increased cars to the area as well as the material required will result in both short- and long-term increase in emissions. Parts of the Main Road through West Winch was identified in Round 3 of the Noise Action Plan Important Areas, and so the policy makes provision for noise as well as air quality mitigation measures. Furthermore, the policy requires the developer to make financial contributions towards the provision of infrastructure including additional primary and secondary school places, and they must also provide

² https://www.west-norfolk.gov.uk/download/downloads/id/8544/f75_-_west_winch_-_historic_englandborough_council_socg_signed_action21.pdf

land for another primary school post 2040. These, alongside the provision of a new road and pedestrian and cycle routes, will have a positive overall impact on local infrastructure.

4.2.2 New Policy (F1.5) Downham Market, Bexwell Business Park (BEX)

The new Policy F1.5 proposes the allocation of Bexwell Business Park, a longstanding employment land commitment to the east of the town. It has extant permission for around 23ha of land, of which 3ha (Karoo Close) has been delivered to date. The remaining 20ha is allocated in this plan, to support the delivery of a significant employment hub, in addition to the established employment area at Bexwell. The policy includes specific criteria to stipulate that access to the site should be provided by existing routes, where possible pedestrian and cycle links should be provided, and the requirement for a site-specific flood risk assessment.

Table 4-3: SA Assessment of Policy & Site F1.5

Revised site assessment: F1.5 Bexwell Business Park (BEX)												
Site Ref.	Site Sustainability Factor											Overall Effect
	A Services Access	B Community & Social	C Economy Business	D Economy Food	E Flood Risk	F Heritage	G Highways & Transport	H Landscape Amenity	I Natural Environ	J Infrastructure, Pollution & Waste	K Climate Change	
F1.5	+	+	++	-	+	-	+	-	0	-	-	+1

The policy includes criteria in relation to providing active travel opportunities between the existing Bexwell business park, as part of an established employment site, which is already serviced by bus stops. Therefore, the additional provision of active travel measures would increase access to services and contributing to healthy lifestyles, scoring positively for these factors. The employment site scores positively for its significant contribution to employment land for Economy A scoring positively for this factor, however, it also scores negatively for Economy B food production, for the loss of Grade 3 agricultural land.

The site is not located within any nationally designated ecological sites, and does not contain any criteria therefore has scored neutrally for factors E and I. The site does not also include proposals for community facilities, also scoring neutrally for this factor. As dictated by the Site Sustainability Factor Scoring Guide, as the site is in Flood Zone 1 it scores positive for flood risk.

A negative impact is determined for both heritage and landscape factors, due to the sites proximity to the setting of Scheduled Monument (Old gatehouse at Bexwell Hall) and listed structures (Barn 110m north of St Marys Church, Church of St Mary the Virgin, and Bexwell Hall Farmhouse). The size of the site is likely to change views when approaching Bexwell from the north. However, these impacts are not expected to be significant due to the existing employment sites adjacent to the allocation. The existing employment site separates the allocation from the designated heritage assets, therefore screening the view of the new allocation.

The main negative impacts arising from the allocation are increased traffic, pollution and waste, resulting in additional waste and greenhouse gas emissions. However, there is no reason to expect that these would be anything over and above any employment land development on a greenfield site of around 20ha.

5 Cumulative Assessment

The previous SA Environmental Report and associated Addendum (2022) concluded that the cumulative impacts of the Plan would overall have a positive impact on sustainability. Table 5-1 shows the total cumulative scores recorded from the previous SA Addendum, and updated scores following re-appraisal in this SA Addendum.

For the strategic policies, the combining of several policies, and creation of new policies has significantly changed the cumulative scores.

For the site-specific policies and sites, there has been a significant change in the cumulative score due to the removal of approximately 37 sites, addition of the Bexwell employment allocation and re-appraisal of West Winch Growth Area policy.

Table 5-1: Summary of updated cumulative scores

	SA Addendum 2022	Updated scores
Policies - positive	555	442
Policies - negative	69	55
Total	486	387
Site specific - positive	396	282
Site specific - negative	170	101
Total	566	383

This SA Addendum does not impact the overall conclusions of the previous Environmental Report (2020) and subsequent SA Addendum (2022). The updated cumulative scores of this SA Addendum still demonstrates significantly more identified positive impacts on sustainability than negative.

6 Monitoring and Next Steps

6.1 Monitoring and the predicted significant impact of the Plan

The significant sustainability effects of implementing a Local Plan must be monitored to identify unforeseen adverse effects and to be able to undertake appropriate remedial action. Guidance stipulates that it is not necessary to monitor everything included in the SA Objectives, but that monitoring should focus on significant sustainability effects.

Upon adoption, the Plan will be accompanied by an Adoption Statement, which will outline those monitoring indicators most appropriate for future monitoring of the Plan in line with Regulation 16 of the SEA Regulations 2004.

6.2 Consultation

A key aspect of the SA process is consultation. The SA process provides a mechanism to ensure that stakeholder engagement requirements are achieved by providing interested parties/ organisations and the public an opportunity to inform the process and comment on decisions taken. Stakeholder engagement also ensures that economic, environmental, and social issues, constraints and opportunities are identified and assessed throughout the development of the Local Plan.

This SA Addendum will be published for consultation in July 2024, alongside the Schedule of Main Modifications.

A Assessment of policy amendments

Table 6-1: Screening amendments for re-appraisal.

Policy	2024 Changes	Need for re-appraisal	Assessment status
LP01: Spatial Strategy	Deletion of Policy LP01 replaced with new policy set out in Topic Paper Spatial Strategy and Settlement Hierarchy (August 2023). New spatial policy in line with previous Core Strategy, also incorporating the Settlement Hierarchy, replacing Policy LP02.	Yes	An updated appraisal can be found in Section 3.3.1
LP02: Settlement Hierarchy	Deletion of policy (see above).	No	n/a
New Policy: Residential development on windfall sites.	New policy to guide residential development on windfall sites, both within and adjacent to development boundaries (as shown on the Policies Map).	Yes	An updated appraisal can be found in Section 3.3.4
New Policy: Neighbourhood plans	New policy and supporting text around guidance of Neighbourhood Plans.	Yes	An updated appraisal can be found in Section 3.3.5
LP03: Presumption in favour of Sustainable Development	Slightly updated wording to align with national policy.	No	No further assessment
LP04: Development Boundaries	Deletion of policy to be replaced by New Policy: Residential development on windfall sites.	No	n/a
LP05: Infrastructure Provision	Updated wording to refer to the Infrastructure Delivery Plan and adding reference to the use of planning obligations to cover emergency services and green infrastructure. Revised wording to ensure timely implementation of infrastructure to provide additional capacity to support development. To be consistent with national policy making sure where no community infrastructure levy contributions are due to viability, the	No	No further assessment

Policy	2024 Changes	Need for re-appraisal	Assessment status
	development must accord with policies in the plan and there is full justification.		
LP06: Climate Change	<p>Deletion of additional text to policy as it is a repetition of other policies in the plan.</p> <p>Updated outdated reference to national policy guidance.</p> <p>Deletion of additional text to policy as it is a repetition of other policies in the plan.</p> <p>Deletion of sub-sections of the policy which are repeated elsewhere or superseded by updates to the Building Regulations.</p> <p>Updated ref to national flooding policy.</p>	No	No further assessment
LP07: The Economy	<p>Clarification that Habitat Regulations Assessment is required.</p> <p>Remove reference to the SADMP as no longer being taken forward.</p> <p>Cross reference to existing major employment sites and policy LP10.</p> <p>Update of site areas of allocated employment sites.</p> <p>Adds reference to New Bexwell Business Park site allocation (F1.5).</p> <p>Updated plan period.</p> <p>Updated table of employment land area allocated.</p> <p>Additional text for consistency.</p> <p>Text amendment to provide positive approach to proposals for alternative uses of employment land for consistency with NPPF.</p>	Yes - required for the updated plan period, site areas of allocated employment sites and the new Bexwell Business Park site.	An updated appraisal can be found in Section 3.3.2

Policy	2024 Changes	Need for re-appraisal	Assessment status
LP08: Retail development	<p>Amended text.</p> <p>Set threshold for sequential approach to main town centre uses.</p> <p>Classification of small-scale convenience retailing thresholds.</p> <p>Aimed to prevent large out of centre food stores.</p> <p>Similar text about thresholds and preserving viability of town centre.</p> <p>Change of threshold number reference.</p>	No	No further assessment
LP09: Touring and Permanent Holiday Sites	<p>Definition of holiday accommodation sites.</p> <p>Changed wording around permitting holiday sites to include all international / nationally designated sites.</p> <p>Repeated text.</p> <p>Amended text to ensure positively worded.</p> <p>Amended text to ensure consistency of NPPF.</p>	No	No further assessment
LP10: Development associated with the National Construction College site, Bircham Newton (CITB), British Sugar Factory, Wissington and RAF Marham Policy	<p>Additional text to ensure policy is positively worded.</p>	No	No further assessment
LP11: Strategic and Major Road Network Policy	<p>Amendment to ensure wording is consistent with national policy on highway safety and amenity and access. Removal of text where repeated in policy LP13 and LP11.</p>	No	No further assessment
LP12: Disused Railway Trackways Policy	<p>No change.</p>	No	No material change

Policy	2024 Changes	Need for re-appraisal	Assessment status
LP13: Transportation Policy	Add heading of policy justification and add reference to Norfolk County council guidance on transport assessment. Removed reference of incorrect name. Include explicit reference to integration of bus and rail services. Add requirement for any development likely to have significant impacts on transport to have assessment.	No	No further assessment
LP14: Parking Provision in New Development	Amend reference to parking standards. Added line about local car ownership levels. Deletion of information on charging points, superseded by building regs.	No	No further assessment
LP15: Coastal Areas Policy	Insertion of header, and line about requirement for bespoke assessment where the tidal hazard mapping is not fit for purpose.	No	No further assessment
LP16: New LP16 Norfolk Coast AONB Policy	No change.	No	No material change
LP17: Coastal Change Management Area (Hunstanton to Dersingham) Policy	Updated name of the policy. Added new paragraph to include specific reference to an Integrated Coastal Zone Management approach. Additional criteria to set out what is acceptable in terms of minor development in coastal area.	No	No further assessment
LP18: Design and Sustainable Development	Additional sentence about light pollution and recognising it as a potential concern. Broadened criteria to encourage infrastructure for range of species. Take account of circumstances where BREEAM not applicable.	No	No further assessment
LP19: Environmental Assets - Green	Adding reference on nature-based solution, mitigation hierarchy, and reference Nature Recovery Strategies and BNG.	No	No further assessment

Policy	2024 Changes	Need for re-appraisal	Assessment status
Infrastructure, Landscape Character, Biodiversity and Geodiversity			
LP20: Environmental Assets – Historic Environment	Entirely re-written policy as agreed with Historic England and Local Planning Authority.	Yes	An updated appraisal can be found in Section 3.3.3
LP21: Environment, Design and Amenity	No change.	No	No material change
LP22: Provision of Recreational Open Space for Residential Developments	Change reference to plan period.	No	No further assessment
LP23: Green Infrastructure	Addition of new paragraph stating the benchmark standards for accessible natural greenspace.	No	No further assessment
LP24: Renewable Energy	Added reference to international sites.	No	No further assessment
LP25: Sites in Areas of Flood Risk	Added reference to explain groundwater as source of flooding and risks of contamination.	No	No further assessment
LP26: Protection of Open Space	No change.	No	No material change
LP27: Habitats Regulation Assessment	Clarification on HRA requirement. Added text describing Breckland SAC and SPA Minor text update. Added reference to RAMSAR and location of AQMA.	No	No further assessment

Policy	2024 Changes	Need for re-appraisal	Assessment status
LP28: Affordable Housing	Re-ordered for clarity and consistency. Change reference to Social Provider and updated cross reference.	No	No further assessment
New Policy: Custom and Self-Build Housing	New policy.	Yes	An updated appraisal can be found in Section 3.3.6
LP29: Housing for the elderly and specialist care	No change.	No	No material change
LP30: Adaptable & Accessible Homes	Amendment to sub-heading. Change sub-heading. Change to relate study (evidence base) is till 2036, rather than the revised Local Plan end-date (2040).	No	No further assessment
LP31: Residential Development Reasonably Related to Existing Settlements Policy	Superseded by proposed new Windfall development policy to replace LP02.	No	n/a
LP32: Houses in Multiple Occupation Policy	No change.	No	No material change
LP33: Enlargement or Replacement Dwellings in the Countryside Policy	No change.	No	No material change
LP34: Housing Needs of Rural Workers Policy	No change.	No	No material change
LP35: Residential Annexes Policy	No change.	No	No material change

Policy	2024 Changes	Need for re-appraisal	Assessment status
LP36: Community and Culture	No change.	No	No material change
LP38: King's Lynn Area	Updated description of spatial strategy, to ensure consistency with LP01. Reference to historic/ previous regeneration strategies removed, to reflect that many of these are complete and/ or superseded. Instead, the focus is now Nelson Quay, as the current key waterfront project. Cross reference to LP22.	No	No further assessment
E1.1: King's Lynn Town Centre	Restructuring of paragraphs and clarification of justification of site in response to inspectors' initial questions.	No	No further assessment
E1.2: Town Centre retail expansion area Policy	Additional text for clarity and description of key concerns for the area.	No	No further assessment
E1.2a: King's Lynn Port Policy	No change.	No	No material change
E1.3: Gaywood Clock Area	Reference to traffic impacts needs to accord with Policy LP13. Text on how to continue existing role of Gaywood Clock role of convenient and accessible shopping facilities. Added in criteria that development may be supported where conserving and enhancing the significance of heritage assets.	No	No further assessment
E1.KLR: King's Lynn Riverfront Regeneration Area Policy	Removed reference to SADMP allocations. Added text on recognising development constraints - including preference for passive defence.	No	No further assessment
E1.5: King's Lynn, Boal Quay	Added required maintenance of defences, information on brownfield land. Cross reference with LP28.	No	No further assessment

Policy	2024 Changes	Need for re-appraisal	Assessment status
E1.6 King's Lynn, South of Parkway	Update to information about existing planning permission status.	No	No further assessment
E1.7 King's Lynn, Land at Lynnsport	Remove references to sites already completed and cross references with policies.	No	No further assessment
E1.8 King's Lynn, South Quay	Additional context around allocation status and cross references with policies.	No	No further assessment
E1.9 King's Lynn, Land west of Columbia Way	Added context, updated number of dwellings, cross references, and HRA requirement.	No	No further assessment
E1.10 King's Lynn, North of Wisbech Road	Added text to reflect wording on flood defences, NPPF and FRA, cross references, and requirement for HRA.	No	No further assessment
E1.11 King's Lynn, Southgates	Deallocation of site.	No	n/a
E1.12 King's Lynn Employment Land	Updates to site size due to trail permission and delivered employment land.	No	No further assessment
E1.13 Green Infrastructure	Reordered paragraphs and clarification that is strategic green infrastructure is lost by development it should be replaced.	No	No further assessment
9.3 West Lynn and E1.14 West Lynn Housing	Reorder of paragraphs. Added cross references to other policies.	No	No further assessment
E1.15 West Lynn Housing, Land at Bankside	Deallocation on grounds of viability and flood risk.	No	n/a
E2.1/E2.2 West Winch Strategic Growth Area	Increased number of dwelling to be delivered (i.e. trajectory). New criteria for preventing impacts on traffic. New date. Updated reference to reflect requirements of the IDP.	Yes	An updated appraisal can be found in Section 4.2.1

Policy	2024 Changes	Need for re-appraisal	Assessment status
	Additional criteria for Green Infrastructure Additional criteria for SuDS. Clarification that adopted NP policies apply Updated dates. New criteria for consistency AQMS. Additional criteria for ecological assessment of site. Requirement for a Heritage Impact Assessment. New criteria for noise. New date. New units and date. Listed out settings of local heritage assets.		
E3.1 South Wootton	Cross reference with another policy.	No	No further assessment
LP40: Hunstanton	Descriptive text removed from policy text into supporting text and updated accordingly.	No	No further assessment
F1.1 Downham Market Town Centre	No change.	No	No material change
F2.1 Hunstanton Town Centre and Retailing	No change.	No	No further assessment
F2.2: Hunstanton - Land to the East of Cromer Road	Cross reference with another policy.	No	No further assessment
F2.3 Hunstanton Housing	No change.	No	No material change

Policy	2024 Changes	Need for re-appraisal	Assessment status
F3.1: Wisbech Fringe - Land east of Wisbech (west of Burrettgate Road)	Cross reference with LP25.	No	No further assessment
G29.1: Dersingham - Land north of Doddshill Road	No change.	No	No material change
G29.2: Dersingham - Land at Manor Road	Deallocated.	No	n/a
G41.2: Grimston and Pott Row - Land adjacent Stave Farm, west of Ashwicken Road	Delete as site completed.	No	n/a
MAR1: Marham - Land south of The Street	Correction of title and infrastructure requirements - improvements to footpath between the old village and airbase. Cross reference to another policy.	No	No further assessment
G112.1: Land south of Thieves Bridge Road	Cross reference with another policy. Increased site capacity (40 dwellings), to reflect extant permission.	No	No further assessment
G13.1: Brancaster - Land to the east of Mill Road	Deletion as completed.	No	n/a
G22.1: Castle Acre - Land west of Massingham Road	Deletion as completed.	No	n/a
G25.1: Clenchwarnton - Land between Wildfields Road and Hall Road	Deletion as completed.	No	n/a

Policy	2024 Changes	Need for re-appraisal	Assessment status
G25.2: Clenchwarnton - Land north of Main Road	Policy cross reference.	No	No further assessment
G25.3: Clenchwarnton - Land south of Main Road	Delete as site completed.	No	n/a
G29.2: Dersingham - Land at Manor Road	Deallocated.	No	n/a
G30.1: Docking - Land situated off Pound Lane (Manor Pasture)	Deletion as completed.	No	n/a
G31.1: East Rudham - Land off Fakenham Road	Includes designation for nutrient neutrality zone. Clarity that Highways are a local authority issue. Cross reference to another policy.	No	No further assessment
G35.1: Feltwell - Land to the rear of Chocolate Cottage, 24 Oak Street	Clarity that Highways are a local authority issue. Cross reference to another policy.	No	No further assessment
G35.3: Feltwell - Land at 40 Lodge Lane / Skye Gardens	Deallocated.	No	n/a
G43.1: Great Massingham - Land south of Walcup's Lane	Clarity that Highways are a local authority issue. Cross reference to another policy.	No	No further assessment
G41.1: Gayton - Land north of Back Street	Cross reference to another policy. Increased site capacity (37 dwellings), to reflect previous permission.	No	No further assessment
G47.1: Heacham - Land off Cheney Hill	Cross reference to another policy. Increased site capacity (133 dwellings), to reflect extant permission.	No	No further assessment
G47.2: Heacham - Land	Delete as site completed.	No	No further

Policy	2024 Changes	Need for re-appraisal	Assessment status
to the south of St. Mary's Close			assessment
G57.1: Land adjacent to Marshland Saint James Primary School	Delete as site completed.	No	n/a
G57.2: Land adjacent 145 Smeeth Road, Marshland Saint James	Changes to site capacity, reflecting consented scheme. Addition of cross reference to LP25 for proposed development sites where site specific flood risk assessments are specifically required. Cross reference to another policy.	No	No further assessment
G59.1: Methwold - Land at Crown Street	Site virtually complete, no longer required.	No	n/a
G59.2: Methwold - Land at Herbert Drive	Almost complete, no longer required.	No	n/a
G59.3: Methwold - Land at Hythe Road	Almost complete, no longer required.	No	n/a
G59.4: Methwold - Land off Globe Street/St George's Court	Almost complete, no longer required.	No	n/a
G83.1: Land south of Common Road and behind Teal Close, Snettisham	Site complete.	No	n/a
G85.1: Land off Lions Close, Southery	Site complete.	No	n/a

Policy	2024 Changes	Need for re-appraisal	Assessment status
G88.1: Stoke Ferry - Land South of Lark Road/ Wretton Road	Updated site capacity (13 dwellings) - reflecting earlier consent now lapsed. Clarity that Highways are a local authority issue. Cross reference to another policy.	No	No further assessment
G88.2: Stoke Ferry - Land at Bradfield Place	Clarity that Highways are a local authority issue. Cross reference to another policy.	No	No further assessment
G88.3: Stoke Ferry - Land at Indigo Road / Lynn Road	Updated site capacity (29 dwellings) to reflect earlier consent now lapsed. Clarity that Highways are a local authority issue. Cross reference to another policy.	No	No further assessment
G93.1: Terrington St. Clement - Land at Church Bank, Chapel Road	Site complete.	No	n/a
G93.2: Terrington St. Clement - Land Adjacent King William Close	Site complete.	No	n/a
G93.3: Terrington St. Clement - Land West of Benn's Lane	Cross reference to another policy. Increased site capacity (43 dwellings), to reflect extant permission.	No	No further assessment
TSC1: Terrington St Clement Land south of Northgate Way and west of Benn's Lane	Clarity that Highways are a local authority issues. Cross reference.	No	No further assessment
G94.1: Terrington St John, St John's Highway and Tilney St Lawrence -	Cross reference to another policy. Increased site capacity (40 dwellings), to reflect earlier permission.	No	No further assessment

Policy	2024 Changes	Need for re-appraisal	Assessment status
Land east of School Road			
G104.1: Upwell - Land north west of Townley Close	Site completed.	No	n/a
G104.2: Upwell - Land south/ east of Townley Close	Site completed.	No	n/a
G104.4: Upwell - Land off St Peter's Road	Site completed.	No	
G104.5: Outwell - Land at Wisbech Road	Updated capacity (40 dwellings) to reflect consented site.	No	No further assessment
G104.6: Outwell - Land Surrounding Isle Bridge	Amendment of dwellings allocated to reflect consented scheme (50 dwellings), flood risk requirements, highways issues, and cross reference.	No	No further assessment
G109.1: Walpole St. Peter - Land south of Walnut Road	Updated capacity (9 dwellings) to reflect consent Cross reference to another policy.	No	No further assessment
G109.2: Walpole St. Peter - Land south of Church Road	Site completed.	No	n/a
LP41: Development in Rural Areas	Superseded by proposed new development boundaries policy and supporting text as agreed.	No	n/a

Policy	2024 Changes	Need for re-appraisal	Assessment status
G28.1: Denver - Land to South of Sluice Road	Amendment to No. of dwellings allocated (6 dwellings) to reflect revised capacity. Changes to policy criterion 1, to clarify that Highways are a local authority issue. Cross reference to another policy.	No	No further assessment
G33.1: East Winch - Land south of Gayton Road	Site completed.	No	n/a
G36.1: Fincham - Land east of Marham Road	Clarification that Highways are a local authority issue. Cross reference to another policy.	No	No further assessment
G45.1: Harpley - Land at Nethergate Street/School Lane	Site completed.	No	n/a
G48.1: Hilgay - Land south of Foresters Avenue	Updated number of dwellings to reflect revised capacity (16 dwellings). Clarification that Highways are a local authority issue. Cross reference to another policy.	No	No further assessment
G52.1: Ingoldisthorpe - Land opposite 143-161 Lynn Road	Site completed.	No	n/a
G72.1: Runcton Holme - Land at School Road	Site completed.	No	n/a
G78.1: Sedgeford - Land off Jarvie Close	Updated capacity of the site (11 dwellings). Clarification that Highways are a local authority issue. Cross reference to another policy.	No	No further assessment

Policy	2024 Changes	Need for re-appraisal	Assessment status
G81.2: Shouldham - Land accessed from Rye's Close	Site completed.	No	n/a
G91.1: Syderstone - Land west of no. 26 The Street	Site completed.	No	n/a
G97.1: Tilney All Saints - Land between School Road and Lynn Road	Site completed.	No	n/a
G106.1: Walpole Highway - Land East of Hall Road	Updated dwelling capacity (8 dwellings, mostly now complete). Clarification that Highways are a local authority issue. Cross reference to another policy.	No	No further assessment
G120.1: Walton Highway - Land adjacent Common Road	Site completed.	No	n/a
G113.1: Welney - Former Three Tuns/Village Hall	Site capacity updated (4 dwellings). Explanation for need to address discharge into Internal Drainage Board (IDB) watercourses. Affordable housing requirement. Requirement for an HRA.	No	No further assessment
G113.2: Welney - Land off Main Street	Updated capacity (17 dwellings). Details of specific IDB discharge issues. Clarification that Highways are a local authority issue. Cross reference to another policy Requirement for an HRA.	No	No further assessment
G114.1: Wereham - Land to the rear of 'Natanya', Hollies Farm, Flegg	Site completed.	No	n/a

Policy	2024 Changes	Need for re-appraisal	Assessment status
Green			
G123.1: Wiggshall St. Germans - Land north of Mill Road	Updated capacity (4 dwellings). Clarification that Highways are a local authority issue. Cross reference to another policy.	No	No further assessment

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