



# Habitats Regulations Assessment of the King's Lynn and West Norfolk Local Plan 2021 - 2040 at Main Modifications

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## Summary

This report provides the Habitats Regulations Assessment (HRA) of King's Lynn and West Norfolk Borough Local Plan 2021 - 2040 and accompanies the Main Modifications version of the Plan, post the examination hearings (April 2024). The HRA is a complete HRA that builds on, and updates, the previous HRA produced at pre-submission.

The Conservation of Habitats and Species Regulations 2017 (as amended) require local authorities to assess the impact of their local plan on the internationally important sites for biodiversity in and around their administrative areas. Together, these Special Protection Areas, Special Areas of Conservation and Ramsar sites are known as European sites. The task is achieved by means of a Habitats Regulations Assessment (HRA).

An HRA asks very specific questions of a plan. Firstly, it 'screens' the plan to identify if there is a risk that certain policies or allocations may have a 'likely significant effect' on a European site, alone or (if necessary) in-combination with other plans and projects. If the risk of likely significant effects can be ruled out, then the plan may be adopted but if they cannot, the plan must be subjected to the greater scrutiny of an 'appropriate assessment' to find out if the plan will have an 'adverse effect on the integrity' of the European sites. The following European site types are located within or in close proximity to the Borough:

- Special Protection Areas (SPAs);
- Special Areas of Conservation (SACs); and
- Ramsar sites.

Following an appropriate assessment, a Plan may only be adopted if an adverse effect on the integrity of the site can be ruled out. If necessary, a plan should be amended to avoid or mitigate any likely conflicts.

The King's Lynn and West Norfolk area holds a number of European sites and these support a wide range of qualifying features. The screening for likely significant effects involved a complete rescreening of the plan, incorporating the main modification and identified likely significant effects relating to:

- **Loss of supporting habitat/functionally-linked land** (Breckland SPA, Ouse Washes SPA/Ramsar, the North Norfolk Coast SPA/Ramsar and the Wash SPA/Ramsar);
- **General urban effects and avoidance of buildings by Stone Curlew** (Breckland SAC/SPA, Ouse Washes SPA/Ramsar);
- **Recreation impacts** (Breckland SPA/SAC, Ouse Washes SPA/Ramsar, Norfolk Valley Fens SAC, Roydon Common & Dersingham Bog SAC, Roydon Common Ramsar, Dersingham Bog Ramsar, The Wash SPA/Ramsar, North Norfolk Coast SAC/SPA/Ramsar and The Wash & North Norfolk Coast SAC);
- **Water-related impacts** (River Wensum SAC, Ouse Washes SAC/SPA/Ramsar, the Norfolk Valley Fens SAC, Breckland SAC, Roydon Common and Dersingham Bog SAC, Roydon Common Ramsar, Dersingham Bog Ramsar, North Norfolk Coast SAC/SPA/Ramsar, The Wash & North Norfolk Coast SAC and the Wash SPA/Ramsar);
- **Air quality** (Roydon Common & Dersingham Bog SAC, Dersingham Bog Ramsar, North Norfolk Coast SAC/SPA/Ramsar, The Wash and North Norfolk Coast SAC, Breckland SAC/SPA and the Ouse Washes SAC/SPA).

These topics were taken to appropriate assessment. With respect to the **loss of supporting habitat/functionally-linked land**, there are a number of wide ranging bird species that are qualifying features of a number of European sites within or close to the Borough. There are risks from development leading to loss of supporting habitat that is functionally linked to the European site. We identify one location where a need for project level HRA has been identified and is highlighted in the Plan. With the protective wording in place, adverse effects can be ruled out alone and in-combination, given the scale of development and the allocation sites, all of which have been checked using GIS, knowledge of the relevant areas and the ecology of the bird interest.

**General urban effects and avoidance of buildings by Stone Curlews** relates to issues with development in close proximity to European site boundaries. In terms of Breckland SPA and Stone Curlews, the avoidance of areas by birds due to the effect of buildings is addressed in Policy LP27 which limits growth within 1500m of the SPA unless particular criteria are met, such as the development is fully within an existing urban area. Only 1 allocation is within 1500m of the SPA, at Feltwell and this is in accordance with the protective policy. A review of allocations outside the 1500m zone but within the potential area where development could impact on Stone Curlews that are using areas outside the SPA boundary indicates no risks. LP27 ensures cumulative impacts are addressed and ensures in-combination effects can be ruled out. Checks for all relevant European sites for housing growth within 400m indicates very low levels of growth and all allocation sites have been checked. The scale of growth and locations involved mean that adverse effects on integrity from urban effects can be ruled out for all European sites, alone or in-combination. There is no need for mitigation.

In terms of impacts from increased **recreation**, adverse effects on integrity in the absence of any mitigation could not be ruled out for Breckland SPA/SAC; Roydon Common & Dersingham Bog SAC, Roydon Common Ramsar, Dersingham Bog SAC; The Ouse Washes SPA/SAC/Ramsar; The North Norfolk Coast SAC/SPA/Ramsar, the North Norfolk Coast & the Wash SAC, The Wash SPA/Ramsar. Risks relate to the overall quantum of growth within the Plan and the potential for in-combination effects from individual allocations. It is therefore necessary for the Local Plan 2021 - 2040 to ensure there is sufficient mitigation. The county-wide mitigation strategy 'GIRAMS' provides the means to provide and secure the necessary mitigation. Without the GIRAMS in place there is no means to address the effects from the overall quantum of growth within the Plan. A GIRAMS action plan has been produced a provides a refresh and update, ensuring that mitigation is fit to address the level of growth (at a County-level) and appropriately costed. With the GIRAMS in place and running smoothly adverse effects on integrity are ruled out for the Plan alone and in-combination.

Various European sites have water-dependent qualifying features which could be affected by development. Adverse effects on integrity from **water-related impacts** are ruled out alone or in-combination for the: Ouse Washes SAC/SPA/Ramsar, the Norfolk Valley Fens SAC, Breckland SAC, North Norfolk Coast SAC/SPA/Ramsar, The Wash & North Norfolk Coast SAC and the Wash SPA/Ramsar. Adverse effects on integrity are eliminated due to the scale of growth, the locations in relation to the European sites and qualifying features and through protective measures established through the review of consent/licensing of abstraction and management of water quality as controlled by the statutory agencies.

The River Wensum SAC has been the subject of advice from Natural England regarding the need for nutrient neutrality and policy wording ensures development will only come forward if it does not add to the pollution burden of the SAC. This relates to two allocations only.

For Roydon Common and Dersingham Bog SAC protective wording has been included within the plan in relation to a single allocation in close proximity (around 1km from the SAC). The wording identifies the need for project level Habitats Regulation Assessment and provision of suitable mitigation where necessary. This

ensures necessary hydrological checks are made and any issues relating to drainage or hydrology adequately resolved in the site design before development can be allowed to proceed.

With respect to **air quality**, the issues are complicated as there is a general trajectory of improving air quality and vehicle emissions are improving. Likely significant effects were triggered for sites where there are roads within 200m. Detailed assessment rules out adverse effects on integrity for North Norfolk Coast SAC/SPA/Ramsar, The Wash and North Norfolk Coast SAC, Breckland SAC/SPA and the Ouse Washes SAC/SPA. There is no need for mitigation. With respect to Roydon Common & Dersingham Bog SAC/Dersingham Bog Ramsar some uncertainty remains and in the absence of mitigation, it is not possible to rule out adverse effects on integrity as a result of plan-led growth and increased traffic flows along the A149. The risks relate to a single short section of road. Policy LP27 refers to the preparation of an air quality strategy and the policy wording ensures development only comes forward if it can demonstrate that adverse effects on integrity are ruled out. This ensures no additional traffic or further exceedance of critical loads at Dersingham Bog. With this 'break' in place, adverse effects on integrity from air quality can be ruled out for Roydon Common & Dersingham Bog SAC/Dersingham Bog Ramsar as a result of the Plan.

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# 1. Introduction

## Context

- 1.1 This report provides the Habitats Regulations Assessment (HRA) of the King's Lynn and West Norfolk Local Plan 2021 - 2040. The Local Plan 2021 - 2040 replaces the Core Strategy (adopted in 2011) and the Site Allocations and Development Management Policies Plan (adopted 2016). The Local Plan 2021 - 2040 combines these two plans into a single document and updates them to cover the period through to 2040.
- 1.2 This HRA has been produced for the version of the Plan at Main Modifications. It is a complete and updated HRA that builds on the previous iteration of the HRA (pre-submission, with the HRA report dated May 2021).
- 1.3 HRA is a key piece of evidence to support a plan and is added to and refined throughout the plan making process, informing and informed by the developing plan. This HRA report therefore will continue to be worked on with the planning officers and other stakeholders, only providing a final HRA after Examination in Public when any final modifications to the plan are checked.

## HRAs and legislative context

- 1.4 The designation, protection and restoration of key wildlife sites is embedded in the Conservation of Habitats and Species Regulations 2017, as amended, which are commonly referred to as the 'Habitats Regulations'. These are domestic law and remain in place post Brexit. The most recent amendments (the Conservation of Habitats and Species (amendment) (EU Exit) Regulations 2019<sup>1</sup>) take account of the UK's departure from the EU.
- 1.5 Regulation 105 *et seq* addresses the assessment of local plans and determines the scope of this HRA alongside recent Government Guidance on the interpretation and application of the Regulations<sup>2</sup>.

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<sup>1</sup> The amending regulations generally seek to retain the requirements of the 2017 Regulations but with adjustments for the UK's exit from the European Union. See Regulation 4, which also confirms that the interpretation of these Regulations as they had effect, or any guidance as it applied, before exit day, shall continue to do so.

<sup>2</sup> Habitats regulations assessments: protecting a European site. Defra and Natural England. 24 February 2021. <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>.

- 1.6 Competent authorities must carry out an assessment under the Habitats Regulations (an HRA), to test if a plan or project proposal could significantly harm the designated features of a European site.
- 1.7 Competent authorities include any public body that decides to give a licence, permit, consent or other permission for work to happen, adopt a plan or carry out work for itself, such as a local planning authority.

### ***European sites***

- 1.8 'European sites' are those over which the provisions of the Habitats Regulations exert an influence, through statute or policy. They are the top tier of protected sites in the UK and are of international importance for nature conservation. These include those sites that were part of the Natura 2000 network of sites prior to Brexit and previously referred to as Natura 2000 sites.
- 1.9 Sites that are afforded statutory protection and included within regulation 8 of the Habitats Regulations are now part of a 'national network' and referred to as Habitats sites. Statutory sites comprise the following:
- Special Areas of Conservation (SACs) designated under the 1992 Habitats Directive;
  - Sites of Community Importance (SCI) included on the list of such sites compiled by the European Commission and submitted before the UK left the EU;
  - Candidate SACs (cSACs), submitted by the UK government to the European Commission before Exit day as eligible for selection as an SCI;
  - Special Protection Areas (SPAs) classified under the 1979 Birds Directive;
- 1.10 As a matter of policy, the following sites are also European sites:
- 'Wetlands of International Importance' (Ramsar sites, listed under the Convention) or proposed Ramsar sites;
  - Potential SPAs (pSPAs),
  - Possible / proposed SACs
  - Areas providing formal compensation for damage to a European site.
- 1.11 The overarching objectives of the national network are to maintain, or where appropriate, restore habitats and species listed in Annexes I and II of the Habitats Directive to a Favourable Conservation Status, and contribute to ensuring, in their area of distribution, the survival and reproduction of wild

birds and securing compliance with the overarching aims of the Wild Birds Directive.

- 1.12 The appropriate authorities must have regard to the importance of protected sites, coherence of the national site network and threats of degradation or destruction (including deterioration and disturbance of protected features) on SPAs and SACs.

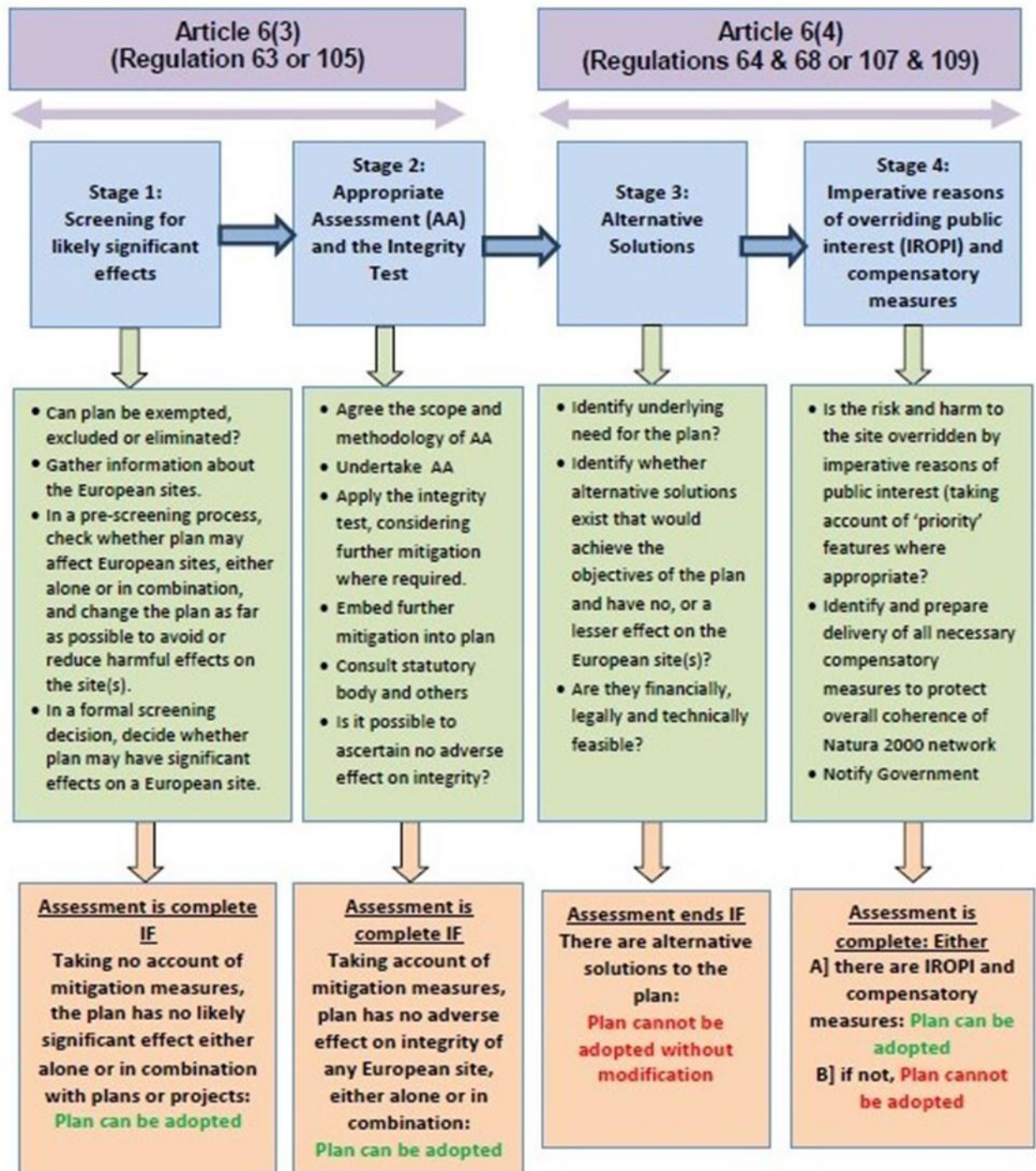
***Process***

- 1.13 Plans and projects which are directly connected with or necessary to the management of a European site may be exempt from the HRA process. For all other plans or projects, assessment proceeds through a step-by-step process, summarised in Figure 1.
- 1.14 Throughout all stages, there is a continual consideration of the options available to avoid and mitigate any identified potential impacts. A competent authority may consider that there is a need to undertake further levels of evidence gathering and evaluation at the appropriate assessment stage in order to provide the necessary certainty. At this point the competent authority may identify the need to add to or modify the plan in order to adequately protect the European site, and these mitigation measures may be added through the imposition of particular restrictions and conditions.
- 1.15 For plans, the stages of HRA are often quite fluid, with the plan normally being prepared by the competent authority itself (in this case, the Borough Council, as the local planning authority). This gives the competent authority the opportunity to repeatedly explore options to prevent impacts, refine the plan and rescreen it to demonstrate that all potential risks to Habitat sites have been successfully dealt with.
- 1.16 When preparing a plan, a competent authority may therefore go through a continued assessment as the plan develops, enabling the assessment to inform the development of the plan. For example, a competent authority may choose to pursue an amended or different option where impacts can be avoided, rather than continue to assess an option that has the potential to significantly affect Habitat site interest features.
- 1.17 After completing an assessment, a competent authority should only adopt a plan where it can be ascertained that there will not be an adverse effect on the integrity of the Habitat site(s) in question. In order to reach this conclusion, the competent authority may have made changes to the plan, or

modified the project with restrictions or conditions, in light of their  
Appropriate Assessment findings.

- 1.18 Where adverse effects cannot be ruled out, further exceptional tests are set out in Regulation 107. In exceptional cases, this allows a plan to be taken forward where there are no 'alternative solutions', where 'imperative reasons of overriding public interest' apply and where compensation can be delivered. It should be noted that meeting these tests is a rare last resort and ordinarily, competent authorities seek to ensure that a plan or project is fully mitigated for, or it does not proceed.
- 1.19 In such circumstances where a competent authority considers that a plan should proceed under Regulations 107, they must notify the relevant Secretary of State. Normally, planning decisions and competent authority duties are then transferred, becoming the responsibility of the Secretary of State, unless on considering the information, the planning authority is directed by the Secretary of State to make their own decision on the plan or project at the local level. The decision maker, whether the Secretary of State or the planning authority, should give full consideration to any proposed 'overriding reasons' for which a plan or project should proceed despite being unable to rule out adverse effects on Habitat site interest features, and ensure that those reasons are in the public interest and are such that they override the potential harm. The decision maker will also need to secure any necessary compensatory measures, to ensure the continued overall coherence of the Habitat site network if such a plan or project is allowed to proceed.

Outline of the four-stage approach to the assessment of plans  
under the Habitats Regulations



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Figure 1: Outline of the assessment of plans under the Habitat Regulations. Though dated prior to the latest amendments to the Regulations, the same tests still apply and it remains valid.

**Definitions, references to case law and guidance**

- 1.20 This HRA follows principles of case law, both UK and EU. It also refers as appropriate to the Habitats Regulations Assessment Handbook (Tyldesley and Chapman, 2021), to which Footprint Ecology subscribes. We also follow relevant government guidance.
- 1.21 Drawing on the Handbook, other relevant guidance and case law, we clarify the following terms used in the flow chart (Figure 1).
- 1.22 In Stage 1, A '**likely significant effect**' following Waddenzee<sup>3</sup>, is a '*possible significant effect; one whose occurrence cannot be excluded on the basis of objective information*'. It is a low threshold and simply means that there is a risk or doubt regarding such an effect. The screening stage is a preliminary examination, sometimes described as a coarse filter, or following *Sweetman*<sup>4</sup>, as '*a trigger for the obligation to carry out an appropriate assessment*'. There should however be credible evidence to show that there is a real rather than a hypothetical risk of effects that could undermine a site's conservation objectives. This was amplified in the *Bagmoor Wind*<sup>5</sup> case where '*if the absence of risk... can only be demonstrated after a detailed investigation, or expert opinion, [then] the authority must move from preliminary examination to appropriate assessment*'.
- 1.23 Following the *People Over Wind* judgement<sup>6</sup>, when making screening decisions for the purposes of deciding whether an appropriate assessment is required, competent authorities cannot take into account any measures intended to avoid or reduce harmful effects upon a European site.
- 1.24 Stage 2 involves the **appropriate assessment and integrity test**. Here a plan can only be adopted if the competent authority can demonstrate that it will not adversely affect the integrity of the Habitat site. This is precautionary approach and means it is necessary to show the absence of harm.
- 1.25 Following *Champion*<sup>7</sup> '**appropriate**' is not a technical term but simply indicates that the assessment needs to be appropriate to the task in hand; i.e. sufficient to fulfil the legal requirements of the Habitat Regulations.

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<sup>3</sup> Waddenzee: European Courts C-127/02 Waddenzee 7<sup>th</sup> September 2004, reference for a preliminary ruling from the Raad van State.

<sup>4</sup> Sweetman: European Court C – 258/11 Sweetman 11<sup>th</sup> April 2013, reference for a preliminary ruling from the Supreme Court of Ireland.

<sup>5</sup> Bagmoor Wind: UK courts Bagmoor Wind v The Scottish Ministers, Court of Session [2012] CSIH 93.

<sup>6</sup> *People Over Wind and Sweetman v Coillte Teoranta* (323-17) [2018] PTSR 1668

<sup>7</sup> *R (on the application of Champion v North Norfolk District Council* [2015] 1 WLR 3170 at para 41

- 1.26 The **integrity** of a Habitat site has been described as the 'coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was classified<sup>8</sup>. An alternative definition, after *Sweetman*<sup>9</sup>, is 'the lasting preservation of the constitutive characteristics of the site'.
- 1.27 In terms of the burden of proof, the HRA of development plans was first made a requirement in the UK following a ruling by the European Court of Justice in *EC v UK*<sup>10</sup>. However, the judgement<sup>11</sup> recognised that any assessment had to reflect the actual stage in the strategic planning process and the level of evidence that might or might not be available. This was given expression in the High Court (*Feeney*)<sup>12</sup> which stated: "*Each ... assessment ... cannot do more than the level of detail of the strategy at that stage permits*".
- 1.28 The need to consider possible **in-combination** effects arises at stage 1 – the screening and also at stage 2 – the appropriate assessment and integrity test. The effects of the plan in-combination with other plans or projects are the cumulative effects which will or might arise from the addition of the effects of other relevant plans or projects alongside the plan under consideration. If during the stage 1 screening it is found the subject plan would have no likely effect alone, but might have such an effect in-combination then the appropriate assessment at stage 2 will proceed to consider cumulative effects. Where a plan is screened as having a likely significant effect alone, the appropriate assessment should initially concentrate on its effects alone.

### ***Role of the competent authority***

- 1.29 This HRA has been prepared by Footprint Ecology to help the Council and the Inspectors discharge their duties under the Habitats Regulations. Further, it should be noted that this HRA has been prepared for the purposes of preparing and examining the Plan. Individual allocations will need to be reviewed when they become the subject of an individual planning application, to ensure that if further assessment under the Habitats

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<sup>8</sup> Para 20 of the ODPM Circ. 06/2005

<sup>9</sup> *Sweetman v An Bord Pleanála* (C-258-11) [2014] PTSR 1092 at paragraph 39

<sup>10</sup> *Commission v UK* (C-6/04) [2005] ECR 1-9017

<sup>11</sup> *Commission of the European Communities v UK* Opinion of Advocate General Kokott

<sup>12</sup> *Feeney v Oxford City Council* [2011] EWHC 2699 Admin at paragraph 92

Regulations is necessary, it is undertaken in accordance with the requirements of appropriate assessment.

## **Background to the main modifications and structure of this report**

- 1.30 Natural England confirmed in their representations of the pre-submission version of the plan that they were satisfied with the pre submission HRA which they described<sup>13</sup> as providing a detailed and comprehensive assessment of the likely significant effect of site allocation and detailed policy on designated sites and meets the requirements of the Habitats Regulations.
- 1.31 A large number of main modifications have now been proposed and these include a number of new policies and changes to the settlement hierarchy. Given the large volume of modifications and complexity of them, we have produced a standalone updated HRA rather than any addendum. This has also allowed us to update particular sections, for example with reference to nutrient neutrality and strategic mitigation for recreation impacts.
- 1.32 The whole of this HRA report has therefore been updated, with the whole Plan (including the Main Modifications) being rescreened and new sections added to the appropriate assessment section.

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<sup>13</sup> Letter dated 28<sup>th</sup> September 2021



## 2. European sites in and around King's Lynn and West Norfolk

### Introduction

2.1 King's Lynn and West Norfolk is particularly important for nature conservation and there are a wide range of European sites within or close to the Borough. These encompass a wide range of different habitats and species. This section provides an overview of the sites, their qualifying features and key issues affecting them and remains unchanged from the pre-submission HRA.

### Overview of European sites

2.2 Using 20km from the Borough boundary as an initial area of search (20km being the maximum extent that policies could reasonably be considered to generate measurable effects), European sites are listed in Table 1 and also shown on Maps 1-3.

**Table 1: European sites within King's Lynn and West Norfolk District or where part of the European site is within a 20km radius of the Borough Council boundary**

SACs	SPAs	Ramsar
Breckland	Breckland	Chippenham Fen
Fenland	Gibraltar Point	Dersingham Bog
Inner Dowsing, Race Bank and North Ridge	Greater Wash	Gibraltar Point
Nene Washes	Nene Washes	Nene Washes
Norfolk Valley Fens	North Norfolk Coast	North Norfolk Coast
North Norfolk Coast	Ouse Washes	Ouse Washes
Ouse Washes	The Wash	Roydon Common
Rex Graham Reserve		The Wash
River Wensum		Wicken Fen
Roydon Common & Dersingham Bog		
Saltfleetby-Theddlethorpe Dunes & Gibraltar Point		
The Wash & North Norfolk Coast		

2.3 Context for the European sites in terms of the general conservation objectives are summarised in Appendix 1. Relevant information on each European site and their qualifying features are provided in Appendix 2, which also provides links to the conservation objectives for each site.

- 2.4 Among the varied European sites, The Wash and North Norfolk Coast, Roydon Common and Dersingham Bog and Breckland are core to this assessment.

### ***The Wash and North Norfolk Coast***

- 2.5 The coastal areas around the Borough are one of the most important marine areas in the UK and European North Sea coast and there are various overlapping designations. Relevant European sites are the North Norfolk Coast SAC, the N Norfolk Coast SPA, The Wash and North Norfolk SAC and the Wash SPA, while the Greater Wash SPA covers the off-shore areas and extends from Bridlington down to the Outer Thames. There are also two Ramsar sites, the Wash and then a separate Ramsar for the North Norfolk Coast.
- 2.6 Intertidal communities include large numbers of polychaetes, bivalves and crustaceans. In the subtidal zone, large dense beds of Brittlestar *Ophiothrix fragilis* and Ross Worm *Sabellaria spinulosa* reefs are present. The intertidal flats are important breeding and hauling-out areas for one of Europe's largest populations of Harbour (Common) Seal *Phoca vitulina*.
- 2.7 The low-lying barrier coast of north Norfolk includes areas of sand- and mud-flats, saltmarshes, shingle, sand dunes, freshwater grazing marsh and reedbed. It supports large breeding populations of waders, terns, Bittern *Botaurus stellaris* and wetland raptors such as Marsh Harrier *Circus aeruginosus*, as well as many wintering and passage waterbirds.
- 2.8 A wide range of threats and pressures currently impact this site, as set out in the site improvement plan,<sup>14</sup> including inappropriate water levels, disturbance from recreation, coastal squeeze, air pollution, non-native invasive marine species and harmful fishing activities.

### ***Roydon Common and Dersingham Bog SAC***

- 2.9 Roydon Common and Dersingham Bog are designated as an SAC for their large areas of wet heaths with Cross-leaved Heath *Erica tetralix*, dry heathland and depressions on peat substrates. They are also listed separately as Ramsar sites.
- 2.10 Roydon Common is one of the best examples of lowland mixed valley mire in Britain, with a complex series of plant communities. Dersingham Bog is the

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<sup>14</sup> <http://publications.naturalengland.org.uk/publication/5327498292232192>

largest remaining example of an acid valley mire in East Anglia, and also has areas of heathland and pine woodland.

- 2.11 Both sites support several rare and uncommon plants such as Round-leaved Sundew *Drosera rotundifolia*, Bog Asphodel *Narthecium ossifragum*, Cranberry *Vaccinium oxycoccos* and White Beak-sedge *Rhynchospora alba*. Invertebrates include the Black Darter *Sympetrum danae*, which is scarce in Norfolk. The heathland areas are an important breeding site for Nightjars *Caprimulgus europaeus*.
- 2.12 Issues affecting this site, as set out in the site improvement plan<sup>15</sup>, include hydrological changes (the site appears to be drying out), inappropriate ditch management, air pollution, undergrazing and water pollution.

### **Breckland SAC/SPA**

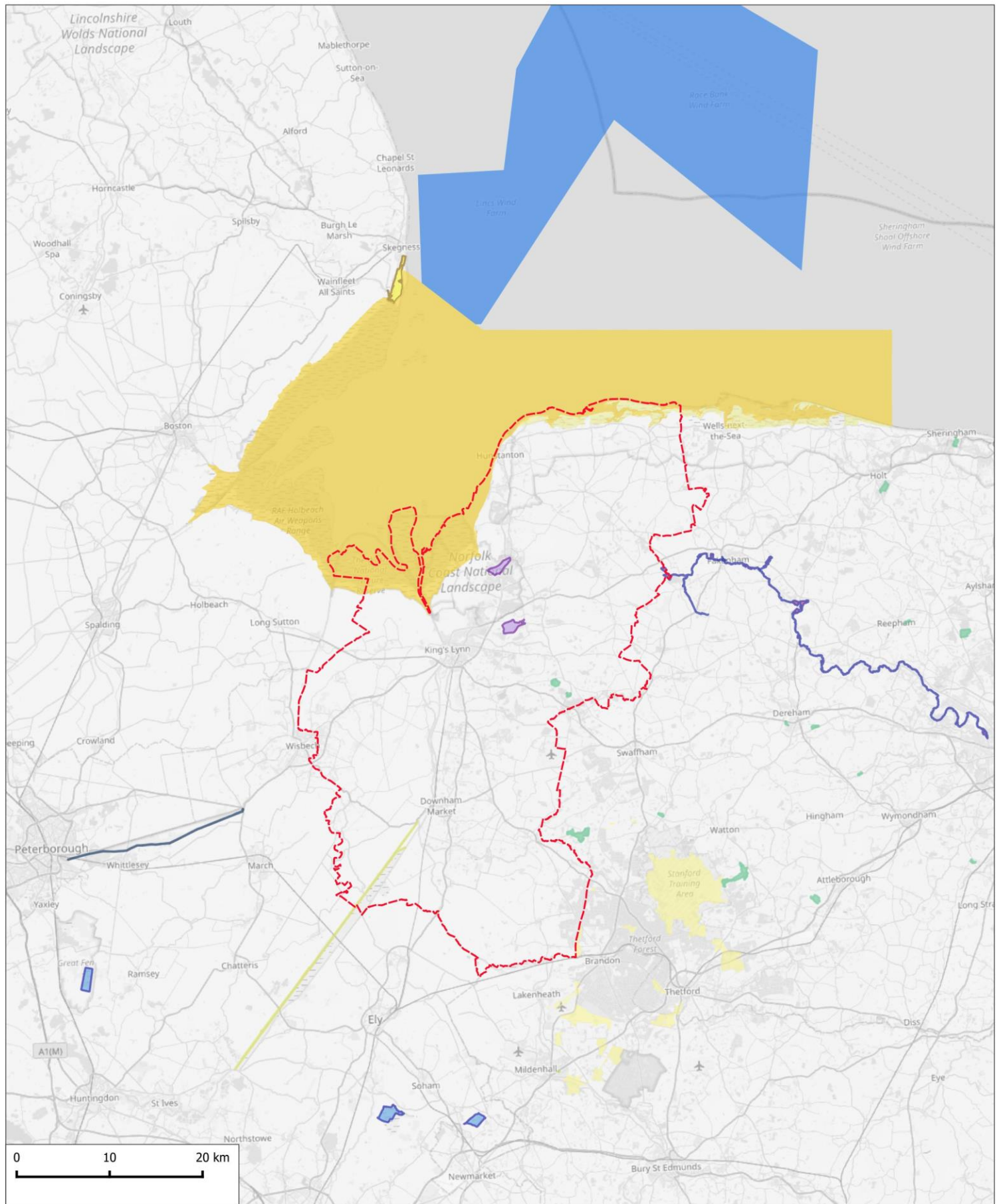
- 2.13 The Breckland SAC and SPA straddles the Norfolk-Suffolk border. It has internationally important populations of Stone-curlew *Burhinus oedicephalus*, Nightjar *Caprimulgus europaeus* and Woodlark *Lullula arborea*. It also supports small numbers of wintering Hen Harrier *Circus cyaneus* and breeding Goshawk *Accipiter gentilis*. The SAC encompasses the open semi-natural habitats including grassland and heathland and also includes the Breckland meres which are examples of hollows within glacial outwash deposits and are fed by water from the underlying chalk aquifer. The SPA extends over a much larger area than the SAC and includes conifer plantations (that support Woodlark and Nightjar) and arable (that supports Stone Curlew).
- 2.14 Key issues for the site, as set out in Natural England's site improvement plan<sup>16</sup>, include lack of ground disturbance to create/maintain the early successional habitats, undergrazing, forestry/woodland management (Woodlark and Nightjar have declined markedly due to the reduction in open habitats within Thetford Forest), water pollution (affecting the meres), planning permissions (with issues for all the Annex I bird species), air quality and public access and disturbance.

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<sup>15</sup> <http://publications.naturalengland.org.uk/publication/4809467120058368>

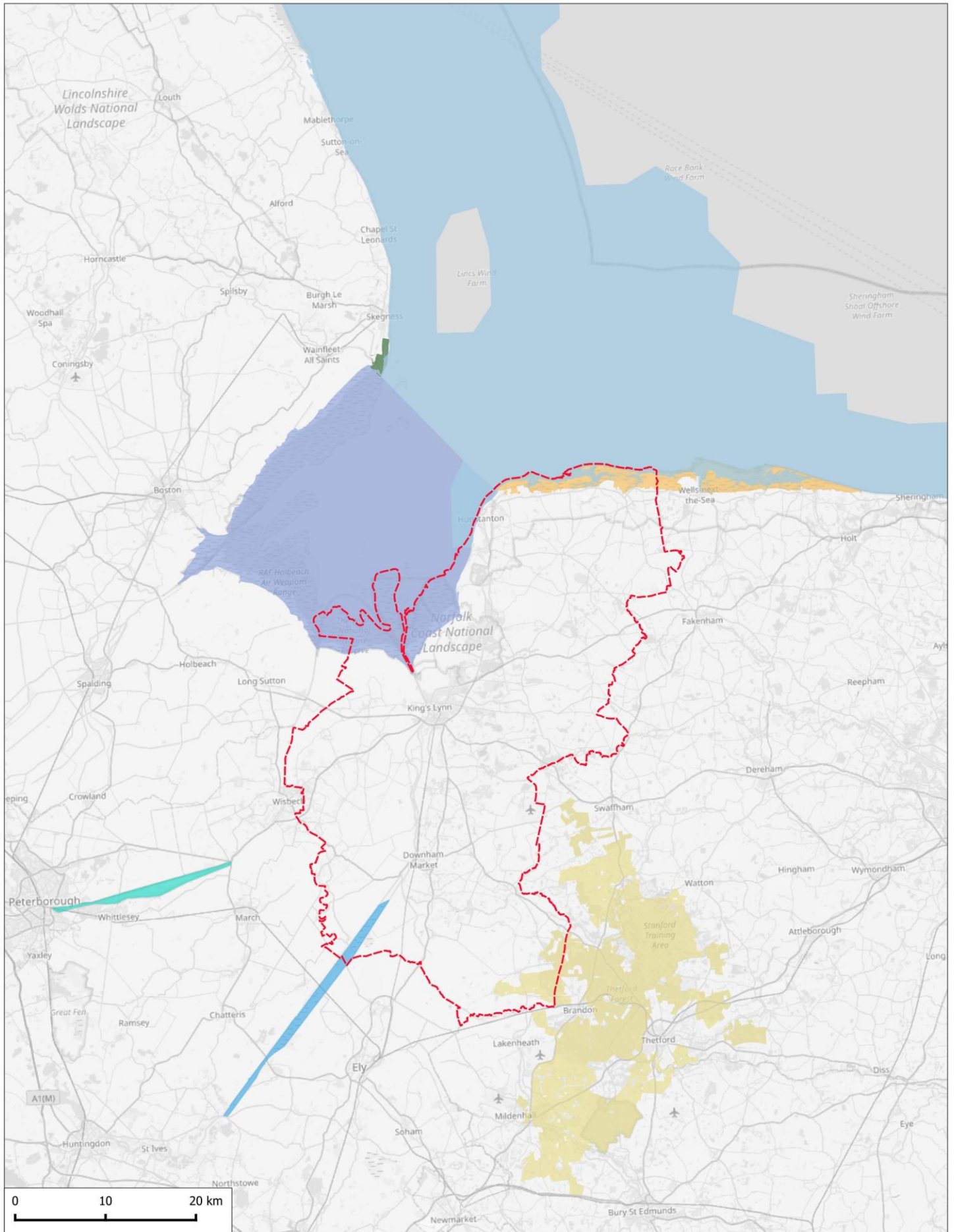
<sup>16</sup> <http://publications.naturalengland.org.uk/publication/5075188492271616>

**Map 1: SACs within 20km of King's Lynn and West Norfolk District**



- |                                          |                     |                                                   |
|------------------------------------------|---------------------|---------------------------------------------------|
| King's Lynn and West Norfolk District    | Norfolk Valley Fens | Roydon Common & Dersingham Bog                    |
| Breckland                                | North Norfolk Coast | Saltfleetby-Theddlethorpe Dunes & Gibraltar Point |
| Fenland                                  | Ouse Washes         | The Wash & North Norfolk Coast                    |
| Inner Dowsing, Race Bank and North Ridge | Rex Graham Reserve  |                                                   |
| Nene Washes                              | River Wensum        |                                                   |

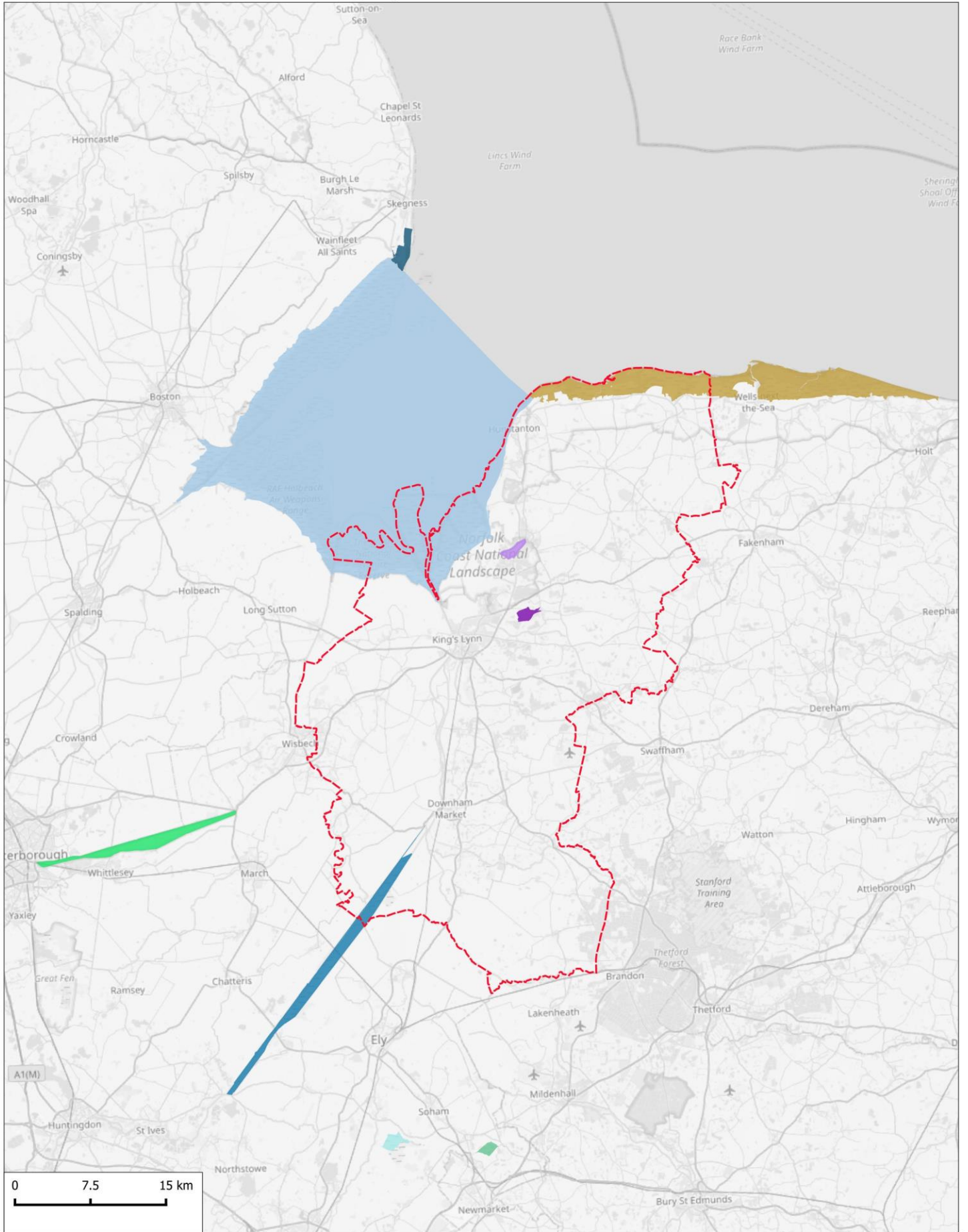
**Map 2: SPAs within 20km of King's Lynn and West Norfolk District**



**Legend**

King's Lynn and West Norfolk District	Gibraltar Point SPA	Nene Washes SPA	Ouse Washes SPA
Breckland SPA	Greater Wash SPA	North Norfolk Coast SPA	The Wash SPA

**Map 3: Ramsar sites within 20km of King's Lynn and West Norfolk District**



**Legend**

- King's Lynn and West Norfolk District
- Nene Washes Ramsar
- North Norfolk Coast Ramsar
- Chippenham Fen Ramsar
- Ouse Washes Ramsar
- Dersingham Bog Ramsar
- Redgrave & South Lopham Fens Ramsar
- Gibraltar Point Ramsar
- The Wash Ramsar

### 3. Screening the Local Plan for Likely Significant Effects

- 3.1 This section documents the screening stage of HRA (stage 1 of the 4-stage process), where the plan is screened for likely significant effects.
- 3.2 The screening for likely significant effects of a plan involves checking all aspects of the plan and identifying any areas of potential concern, which are then examined in more detail in the appropriate assessment (stage 2) of HRA. The check for likely significant effects provides a provisional screening of the plan. It is undertaken to enable the plan maker as competent authority to do two things; narrow down the elements of the plan that may pose a risk to European sites to highlight those options that are likely to be harmful and, where an option poses a risk but is a desired element of the plan, the screening exercise identifies where further assessment is necessary in order to determine the nature and magnitude of potential impacts on European sites and what could be done to eliminate those risks. Further assessment and evidence gathering after early screening may include, for example, the commissioning of additional survey work, modelling, researching scientific literature or setting out justifications in accordance with expert opinion.

#### What constitutes a likely significant effect?

- 3.3 At the screening stage of HRA, there is the opportunity to identify changes to the plan that could be made to avoid risks to European sites, and this is particularly relevant at this stage in the plan making as issues can be identified up front and resolved with later iterations of the plan. It should also be noted that the preliminary work identifying impact pathways and issues has already been running parallel to the plan making and has informed the choice of location and options included in the plan at this stage.
- 3.4 Where the screening identifies risks that cannot be avoided with simple clarifications, corrections or instructions for project level HRA, a more detailed assessment is undertaken to gather more information about the likely significant effects and give the necessary scrutiny to potential mitigation measures. This is the appropriate assessment stage of HRA.

- 3.5 A likely significant effect could be concluded on the basis of clear evidence of risk to European site interest, or there could be a scientific and plausible justification for concluding that a risk is present, even in the absence of direct evidence. The latter is a precautionary approach, which is one of the foundations of the high-level of protection pursued by EU policy on the environment, in accordance with the EU Treaty<sup>17</sup>. The precautionary principle should be applied at all stages in the HRA process and follows the principles established in case law relating to the use of such a principle in applying the European Directives and domestic Habitats Regulations. In particular, the European Court in the 'Waddenzee' case<sup>18</sup> refers to "*no reasonable scientific doubt*" and in the 'Sweetman' case<sup>19</sup> the Advocate General identified that a positive conclusion on screening for likely significant effects relates to where there "*is a possibility of there being a significant effect*".
- 3.6 The screening in this report looks at policies and options prior to any avoidance, reduction/mitigation measures in line with People Over Wind<sup>20</sup>. Mitigation potential can only be considered at Appropriate Assessment stage. People Over Wind clarified the need to carefully explain actions taken at each HRA stage, particularly at the screening for likely significant effects stage. The Judgment highlights the need for clear distinction between the stages of HRA, and good practice in recognising the function of each. The screening for likely significant effects stage should function as a screening or checking stage (regardless of avoidance, reduction/mitigation measures), to determine whether further assessment is required. Assessing the nature and extent of potential impacts on European site interest features, and the robustness of mitigation options, should be done at the appropriate assessment stage.
- 3.7 The screening of this version of the plan is based on the Plan incorporating the Main Modifications. We have drawn upon the previous HRA reports and produced a comprehensive screening table, screening policy by policy of the complete Plan, including the Main Modifications. This will ensure that the Local Plan being adopted by the Council has been checked for any possibility of significant effects on European sites and provides an accurate and up to date record of assessment for the plan.

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<sup>17</sup> Article 191 of the Treaty on the Functioning of the EU. Previously Article 174 of the Treaty of the EC.

<sup>18</sup> Waddenzee: European Court of Justice case C - 127/02

<sup>19</sup> Sweetman: European Court of Justice case C - 258/11

<sup>20</sup> People Over Wind: European Court Case C-323/17 People Over Wind & Peter Sweetman v Coillte Teoranta  
12 April 2018



## Identifying impact pathways

3.8 Drawing on our list of all European sites within 20km of the Borough, previous HRA work and the locations that are the focus for the Local Plan, we can identify the following potential impact pathways (i.e. credible risks) to European sites from the Plan:

- **Loss of supporting habitat/functionally-linked land** (i.e. direct loss of habitat that is used by mobile species or directly linked to the European sites);
- **General urban effects and effects of buildings** (umbrella term relating to development in close proximity to European sites and issues such as increased fly-tipping, invasive species, cat predation etc.), we include the avoidance of otherwise suitable habitat close to buildings by Stone Curlew under this heading;
- **Recreation impacts** (including trampling, disturbance, contamination and increased fire risk resulting from increased population and change in distribution of housing, with more people living nearby European sites);
- **Hydrological impacts** (relating to water quality and availability);
- **Air quality** (linked to increased road traffic);

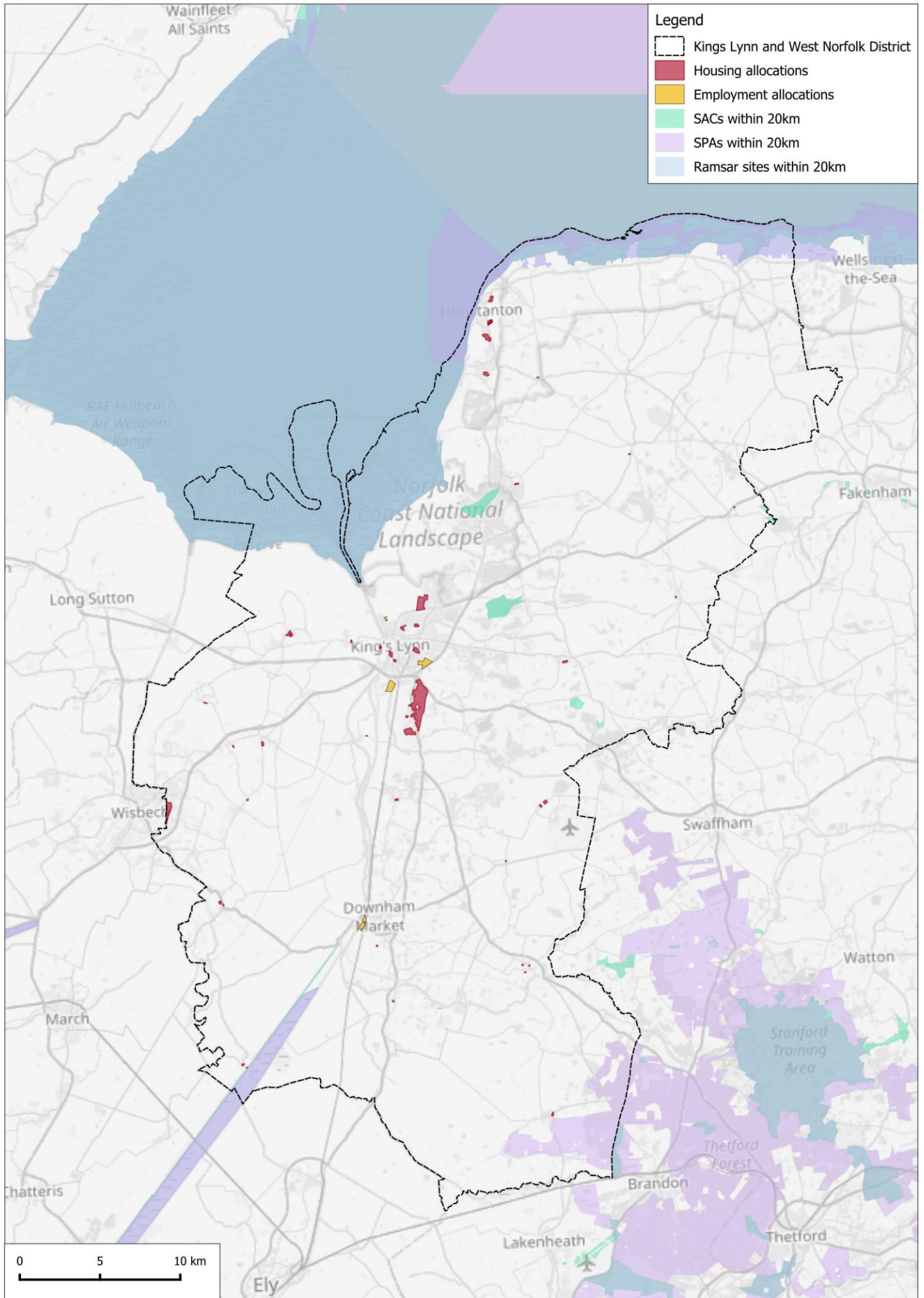
3.9 These pathways are simple terms, each encompassing a range of issues.

## Identifying European sites potentially at risk

3.10 European sites within a 20km radius of the Borough boundary are listed in previous sections and shown in Maps 1-3. Map 4 shows key elements of the Plan, including sites.

3.11 Reviewing this list, we can focus on those that are relevant to the screening (see Table 2). Many of the European sites listed are well away from the Borough boundary and there is no plausible mechanism by which the Plan could have an impact. These are shaded grey in the table. The pathways and European sites potentially at risk were identified in the pre-submission HRA and have not needed to change with the Main Modifications.

Map 4: Local plan allocations and European sites



**Table 2: Summary of European sites within 20km, potentially relevant impact pathways for those sites and those that can be eliminated from further consideration (grey shading). Those sites with no figure in the distance column fall within or partly within the King's Lynn and West Norfolk Borough boundary.**

European site	Distance (km) from borough boundary	Loss of supporting habitat/ functionally-linked land	General urban effects and avoidance of buildings	Recreation impacts	Water related impacts	Air quality	Reasons for elimination from rest of assessment
<b>SACs</b>							
Breckland SAC	-		✓	✓	✓	✓	
Fenland SAC	14.7						Comprises Chippenham Fen, Snailwell Poor Fen, Wicken Fen and Woodwalton Fen all well outside Borough. No plausible impacts due to distance.
Inner Dowsing, Race Bank and North Ridge SAC	10.9						Offshore and no plausible way Plan could impact.
Nene Washes SAC	8.7						Designated for Spined Loach. Catchment well outside Borough.
Norfolk Valley Fens SAC	-		✓		✓	✓	
North Norfolk Coast SAC	-		✓	✓	✓	✓	
Ouse Washes SAC	-				✓	✓	
Rex Graham Reserve SAC	11.8						Small site well to the south, supporting rare orchids. No plausible impacts due to distance.
River Wensum SAC	-		✓		✓	✓	
Roydon Common & Dersingham Bog SAC	-		✓	✓	✓	✓	

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European site	Distance (km) from borough boundary	Loss of supporting habitat/ functionally-linked land	General urban effects and avoidance of buildings	Recreation impacts	Water related impacts	Air quality	Reasons for elimination from rest of assessment
Saltfleetby-Theddlethorpe Dunes & Gibraltar Point SAC	18.3						Sand dunes and coastal habitats round the Wash, no plausible impacts due to distance.
The Wash & North Norfolk Coast SAC	-		✓	✓	✓	✓	
<b>SPAs</b>							
Breckland SPA	-	✓	✓	✓		✓	
Gibraltar Point SPA	17.6						No plausible impact due to distance.
Greater Wash SPA	-						Offshore and no plausible way Plan could impact.
Nene Washes SPA	8.7						Site supports wintering and breeding waterbirds; Borough is outside the catchment and well beyond likely feeding range for the birds.
North Norfolk Coast SPA	-	✓	✓	✓	✓	✓	
Ouse Washes SPA	-	✓		✓	✓	✓	
The Wash SPA	-	✓	✓	✓	✓	✓	
<b>Ramsar sites</b>							
Chippenham Fen	14.7						No plausible impacts due to distance.
Dersingham Bog	-		✓	✓	✓	✓	
Gibraltar Point	17.6						No plausible impacts due to distance.
Nene Washes	8.7						No plausible impacts due to distance.
North Norfolk Coast	-	✓	✓	✓	✓	✓	

European site	Distance (km) from borough boundary	Loss of supporting habitat/functionally-linked land	General urban effects and avoidance of buildings	Recreation impacts	Water related impacts	Air quality	Reasons for elimination from rest of assessment
Ouse Washes	-	✓	✓	✓	✓	✓	
Roydon Common	-		✓	✓	✓	✓	
The Wash	-	✓	✓	✓	✓	✓	
Wicken Fen	16.6						No plausible impacts due to distance.

## Findings from the screening

- 3.12 The screening for likely significant effects is set out in Appendix 3. This is a modified version of the screening table from the pre-submission HRA and therefore follows the structure and policy numbers etc used in the pre-submission HRA. This approach ensures we can update the previous HRA findings and is necessary to ensure consistency with the Local Plan, as submitted.
- 3.13 The updated table in Appendix 3 covers the whole plan, incorporating the modifications. Where risks are highlighted and there is a possibility of significant effects on European sites, further and more detailed assessment is required. As with the pre-submission HRA, all impact pathways initially identified are taken forward to appropriate assessment.
- 3.14 Those strategic policies which are identified as triggering likely significant effect are summarised in Table 3, below. These include 2 new policies that have been added as part of the Main Modifications.
- 3.15 Screening did not consider mitigation measures, which in accordance with *People vs Wind* must be considered at appropriate assessment. Table 4 summarises those policies that include bespoke details intended to avoid or reduce harmful effects to a European site.
- 3.16 In addition to the strategic policies and those setting out mitigation, all detailed site policies/allocations triggered likely significant effects for a range of issues. In Appendix 4 we provide a table with the relevant distances from the allocation boundary to each European site. Shading here reflects the distance and allows allocations in close proximity to the European sites to be picked out. This table has been updated to reflect the allocations in the Plan at Main Modifications.
- 3.17 Screening identified likely significant effects for the following policies/allocations alone in relation to loss of supporting habitat/functionally-linked land. These were all identified on a precautionary basis as falling within the relevant distances at which birds associated with the relevant site might be expected to roam (and these are reviewed in the relevant appropriate assessment section):
- Breckland SPA: G35.1, G56.1, G88.1, G88.2, G88.3, MAR1 (all within 7km of the SPA);
  - Ouse Washes SPA/Ramsar: G113.1, G113.2, G28.1, G48.1, (all within 5km of the SPA);
  - North Norfolk Coast SPA/Ramsar: F2.2, F2.3, F2.5 (all within 5km of the SPA);

- The Wash SPA/Ramsar: F2.2, F2.3, F2.5, G47.1, E1.12-EST, G25.2, E1.9, E3.1, E1.14, E1.7, G29.1, E1.8, E1.5, G78.1, E1.10, TSC1, G93.3, E1.6 (all within 5km of the SPA).

3.18 Screening identified likely significant effects for the following policies/allocations alone due to their specific location and risks in relation to general urban effects and avoidance of buildings:

- Breckland SPA: G35.1 (within 400m of the SPA);
- Ouse Washes SPA/Ramsar: G113.1 and G113.2 (both within 400m of the SPA/Ramsar).

3.19 Screening identified likely significant effects from recreation for all allocations. For two allocations (G113.1 and G113.2), likely significant effects were triggered alone due to their immediate proximity to the Ouse Washes SPA/Ramsar. For all allocations and relevant European sites there were also in-combination risks triggered to various European sites. The impacts relate to the overall quantum of growth and the GIRAMS is based on a county-wide mitigation tariff and mitigation approach. On a precautionary basis all allocations were therefore screened in for the following European sites: Breckland SPA/SAC, Ouse Washes SPA/Ramsar, Norfolk Valley Fens SAC, Roydon Common & Dersingham Bog SAC, Roydon Common Ramsar, Dersingham Bog Ramsar, The Wash SPA/Ramsar, North Norfolk Coast SAC/SPA/Ramsar and The Wash & North Norfolk Coast SAC.

3.20 In Appendix 5 we summarise the allocations by the zones used in the GIRAMS, using the latest zones as produced by Footprint Ecology in 2024.

3.21 Screening identified likely significant effects from recreation for the following policies alone, due to their proximity to the European sites:

- Ouse Washes SAC/SPA/Ramsar: G113.1 and G113.2;
- Roydon Common and Dersingham Bog SAC (and relevant Ramsar sites): G29.1.

3.22 Screening also identified effects alone relating to the overall quantum of growth (as set out in Policies LP01, xx, xx and LP38) and water related impacts for the following European sites:

- River Wensum SAC, Ouse Washes SAC/SPA/Ramsar, the Norfolk Valley Fens SAC, Breckland SAC, Roydon Common and Dersingham Bog SAC, Roydon Common Ramsar, Dersingham Bog Ramsar, North Norfolk Coast SAC/SPA/Ramsar, The Wash & North Norfolk Coast SAC and the Wash SPA/Ramsar.

3.23 Screening identified likely significant effects for the following European sites and allocations alone with respect to water-related issues:

- Ouse Washes SAC/SPA/Ramsar: G113.1 and G113.2;
- Roydon Common and Dersingham Bog SAC (and relevant Ramsar sites): G29.1;
- River Wensum SAC (G31.1, G42.1).

3.24 Screening identified effects alone relating to the overall quantum of growth (as set out in Policies LP01, xx, xx and LP38) and air quality for the following European sites: Roydon Common & Dersingham Bog SAC, Dersingham Bog Ramsar, North Norfolk Coast SAC/SPA/Ramsar, The Wash and North Norfolk Coast SAC, Breckland SAC/SPA and the Ouse Washes SAC/SPA.



Table 3: Strategic policies where likely significant effects are triggered

Policy	Loss of supporting habitat/functionally-linked land	General urban effects and avoidance of buildings	Recreation impacts	Water related impacts	Air quality
LP01 - Spatial Strategy Policy	Effects alone for: Breckland SPA; North Norfolk Coast SPA/Ramsar, Ouse Washes SPA/Ramsar, The Wash SPA/Ramsar,	Effects alone for: Breckland SPA, Ouse Washes SAC/SPA/Ramsar	Effects alone for: Breckland SPA/SAC, Norfolk Valley Fens SAC, Roydon Common & Dersingham Bog SAC, Roydon Common Ramsar, Dersingham Bog Ramsar, The Wash & North Norfolk Coast SAC, The Wash SPA/Ramsar, North Norfolk Coast SAC/SPA/Ramsar, Ouse Washes SPA/Ramsar	Effects alone for: River Wensum SAC, Ouse Washes SAC/SPA/Ramsar, the Norfolk Valley Fens SAC, Breckland SAC, Roydon Common and Dersingham Bog SAC, Roydon Common Ramsar, Dersingham Bog Ramsar, North Norfolk Coast SAC/SPA/Ramsar, The Wash & North Norfolk Coast SAC and the Wash SPA/Ramsar	Effects alone for: Roydon Common & Dersingham Bog SAC, Dersingham Bog Ramsar, North Norfolk Coast SAC/SPA/Ramsar, The Wash and North Norfolk Coast SAC, Breckland SAC/SPA and the Ouse Washes SAC/SPA
New Policy - 'Residential development on windfall sites'	Effects alone for: Breckland SPA; North Norfolk Coast SPA/Ramsar, Ouse Washes SPA/Ramsar, The Wash SPA/Ramsar,		Effects alone for: Breckland SPA/SAC, Norfolk Valley Fens SAC, Roydon Common & Dersingham Bog SAC, Roydon Common Ramsar, Dersingham Bog Ramsar, The Wash & North Norfolk Coast SAC, The Wash SPA/Ramsar, North Norfolk Coast SAC/SPA/Ramsar, Ouse Washes SPA/Ramsar	Effects alone for: River Wensum SAC, Ouse Washes SAC/SPA/Ramsar, the Norfolk Valley Fens SAC, Breckland SAC, Roydon Common and Dersingham Bog SAC, Roydon Common Ramsar, Dersingham Bog Ramsar, North Norfolk Coast SAC/SPA/Ramsar, The Wash & North Norfolk Coast SAC and the Wash SPA/Ramsar	Effects alone for: Roydon Common & Dersingham Bog SAC, Dersingham Bog Ramsar, North Norfolk Coast SAC/SPA/Ramsar, The Wash and North Norfolk Coast SAC, Breckland SAC/SPA and the Ouse Washes SAC/SPA
New Policy - 'Neighbourhood Plans'	Effects alone for: Breckland SPA; North Norfolk Coast SPA/Ramsar, Ouse Washes SPA/Ramsar, The Wash SPA/Ramsar,		Effects alone for: Breckland SPA/SAC, Norfolk Valley Fens SAC, Roydon Common & Dersingham Bog SAC, Roydon Common Ramsar, Dersingham Bog Ramsar, The Wash & North Norfolk Coast SAC, The Wash SPA/Ramsar, North Norfolk Coast SAC/SPA/Ramsar, Ouse Washes SPA/Ramsar	Effects alone for: River Wensum SAC, Ouse Washes SAC/SPA/Ramsar, the Norfolk Valley Fens SAC, Breckland SAC, Roydon Common and Dersingham Bog SAC, Roydon Common Ramsar, Dersingham Bog Ramsar, North Norfolk Coast SAC/SPA/Ramsar, The Wash & North Norfolk Coast SAC and the Wash SPA/Ramsar	Effects alone for: Roydon Common & Dersingham Bog SAC, Dersingham Bog Ramsar, North Norfolk Coast SAC/SPA/Ramsar, The Wash and North Norfolk Coast SAC, Breckland SAC/SPA and the Ouse Washes SAC/SPA

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Policy	Loss of supporting habitat/ functionally-linked land	General urban effects and avoidance of buildings	Recreation impacts	Water related impacts	Air quality
LP07 - The Economy Policy			In-combination effects of recreation for: Norfolk Valley Fens SAC, Roydon Common & Dersingham Bog SAC, Roydon Common Ramsar, Dersingham Bog Ramsar, The Wash & North Norfolk Coast SAC, The Wash SPA/Ramsar, North Norfolk Coast SAC/SPA/Ramsar		
LP15 - Coastal Areas Policy			In-combination effects of recreation for: Norfolk Valley Fens SAC, Roydon Common & Dersingham Bog SAC, Roydon Common Ramsar, Dersingham Bog Ramsar, The Wash & North Norfolk Coast SAC, The Wash SPA/Ramsar, North Norfolk Coast SAC/SPA/Ramsar		
LP38 - King's Lynn Policy	Effects alone for: North Norfolk Coast SPA/Ramsar, The Wash SPA/Ramsar,		Effects alone for: Breckland SPA/SAC, Norfolk Valley Fens SAC, Roydon Common & Dersingham Bog SAC, Roydon Common Ramsar, Dersingham Bog Ramsar, The Wash & North Norfolk Coast SAC, The Wash SPA/Ramsar, North Norfolk Coast SAC/SPA/Ramsar, Ouse Washes SPA/Ramsar	Effects alone for: River Wensum SAC, Ouse Washes SAC/SPA/Ramsar, the Norfolk Valley Fens SAC, Breckland SAC, Roydon Common and Dersingham Bog SAC, Roydon Common Ramsar, Dersingham Bog Ramsar, North Norfolk Coast SAC/SPA/Ramsar, The Wash & North Norfolk Coast SAC and the Wash SPA/Ramsar	Effects alone for: Roydon Common & Dersingham Bog SAC, Dersingham Bog Ramsar, North Norfolk Coast SAC/SPA/Ramsar, The Wash and North Norfolk Coast SAC, Breckland SAC/SPA and the Ouse Washes SAC/SPA

Table 4: Policies that relate to mitigation, have not been taken into account at the screening and need to be considered at appropriate assessment

Policy	General urban effects and avoidance of buildings	Recreation impacts	Water related impacts	Air quality
LP19 - Environmental Assets - Green Infrastructure, Landscape Character, Biodiversity and Geodiversity Policy	Zone relating to Breckland SPA			
LP23 - Green Infrastructure Policy		Mitigation relating to all relevant sites: Breckland SPA/SAC, Norfolk Valley Fens SAC, Roydon Common & Dersingham Bog SAC, Roydon Common Ramsar, Dersingham Bog Ramsar, The Wash & North Norfolk Coast SAC, The Wash SPA/Ramsar, North Norfolk Coast SAC/SPA/Ramsar, Ouse Washes SPA/Ramsar		
LP27 - Habitats Regulations Assessment (HRA) Policy	Zone relating to Breckland SPA	Mitigation relating to all relevant sites: Breckland SPA/SAC, Norfolk Valley Fens SAC, Roydon Common & Dersingham Bog SAC, Roydon Common Ramsar, Dersingham Bog Ramsar, The Wash & North Norfolk Coast SAC, The Wash SPA/Ramsar, North Norfolk Coast SAC/SPA/Ramsar, Ouse Washes SPA/Ramsar		Mitigation relating to Dersingham Bog
E1.13 King's Lynn - Green Infrastructure Policy		Cross-references to GI and mitigation role; relevant to: Breckland SPA/SAC, Norfolk Valley Fens SAC, Roydon Common & Dersingham Bog SAC, Roydon Common Ramsar, Dersingham Bog Ramsar, The Wash & North Norfolk Coast SAC, The Wash SPA/Ramsar, North Norfolk Coast SAC/SPA/Ramsar, Ouse Washes SPA/Ramsar		

## 4. Appropriate assessment: Loss of supporting habitat /functionally-linked land

### Relevant policies from LSE screening

- 4.1 Screening at main modifications identified the overall quantum of growth (as set out in LP01 Spatial Strategy Policy and also in the new strategic policies for Residential development on windfall sites and Neighbourhood Plans) triggered likely significant effects alone as a result of the potential loss of supporting habitat/functionally-linked land for Breckland SPA, Ouse Washes SPA/Ramsar, the North Norfolk Coast SPA/Ramsar and the Wash SPA/Ramsar.
- 4.2 Screening identified likely significant effects for the following policies alone in relation to loss of supporting habitat/functionally-linked land:
- Breckland SPA: G35.1, G56.1, G88.1, G88.2, G88.3, MAR1 (all within 7km of the SPA);
  - Ouse Washes SPA/Ramsar: G113.1, G113.2, G28.1, G48.1, (all within 5km of the SPA);
  - North Norfolk Coast SPA/Ramsar: F2.2, F2.3, F2.5 (all within 5km of the SPA);
  - The Wash SPA/Ramsar: F2.2, F2.3, F2.5, G47.1, E1.12-EST, G25.2, E1.9, E3.1, E1.14, E1.7, G29.1, E1.8, E1.5, G78.1, E1.10, TSC1, G93.3, E1.6 (all within 5km of the SPA).
- 4.3 These screening findings broadly match the pre-submission HRA, however at main modifications we have screened in two new policies (relating to residential development on windfall sites and to neighbourhood plans) and in addition a number of allocations have been removed from the Plan and no longer need to be considered.

### Introduction

- 4.4 For a number of sites and species there are areas outside the boundary of the European site that are likely to be important and at risk from development. There are therefore risks to sites through the loss, deterioration, or compromise of habitat outside a European site boundary that serves a supporting role for the European site, as reservoirs of mobile species migrating in and out of a European site or providing genetic exchange, as roosting, foraging or breeding sites for species as stepping stones between European sites and equivalent habitat. Where

European sites are isolated in the landscape there is greater risk of species extinctions and little chance of recolonisation.

4.5 The following sites and issues are potentially relevant:

- **Breckland SPA:** Nightjar are known to roam widely from breeding sites and feed in a range of habitats away from heaths and forest blocks.
- **Ouse Washes SPA:** land outside of the SPA is known to provide daytime foraging localities for wintering Bewick's and Whooper Swans, and Hen Harriers, which roost within the SPA.
- **North Norfolk Coast SPA and the Wash SPA/Ramsar:** land outside the SPA may provide foraging localities for wintering Pink-footed and Dark-bellied Brent Geese, and breeding localities for Marsh Harrier.

## Breckland SPA

4.6 Nightjar are an interest feature of the Breckland SPA and studies of Nightjar in Dorset have shown that birds will fly a considerable distance away from the breeding sites to feed at night (Alexander and Cresswell, 1990; Cresswell, 1996). These studies radio-tracked birds and showed that they were leaving forest clearings (most of the tracking was conducted in conifer plantations) to feed in deciduous woodland, orchards, village gardens and they also used wetland sites such as streams, small ponds and water meadows. Cresswell (1996) also notes that radio-tracking from an open heathland site (Hartland Moor) found birds were using nearby saltmarsh.

4.7 Nightjar feed on insects and predominantly catch them in flight, either in sustained flight or 'fly-catching' from a perch or the ground (see Cresswell 1996 for details). Cresswell (1996) argues that habitats used on foraging trips - deciduous woodland and wet grassland in particular - may be of considerable importance to Nightjar: "when it comes to Nightjar conservation, we believe that there may be a need to consider both breeding and feeding habitats".

4.8 Urban growth around the Breckland SPA may therefore impact on Nightjar. The concerns would relate to:

- The direct loss of foraging habitat that is functionally linked to the SPA, and;
- Flight paths and access to foraging habitat being blocked or restricted by the presence of built development.

- 4.9 Nightjar are summer migrants and on territory from May through to August. During this time, it is likely that different areas and habitats will be important for foraging. Different areas are likely to be important depending on the weather (for example some areas will be more sheltered than others), depending on prey abundance (different insects will peak at different times and in different habitats) and for individual Nightjar (for example requirements may be different just after migration or when feeding chicks), as such it is expected that a range of habitats are likely to be important.
- 4.10 Off-site foraging for Nightjar has been a focus in the area around Poole in recent years, where there has been growing pressure to develop sites around Canford Heath. HRA work undertaken for the Borough of Poole Local Plan in 2018 (see Hoskin, Liley, & Underhill-Day, 2018) drew on GPS tracking, commissioned by developers (Souter, 2017). The use of GPS tags allows the locations of birds to be recorded at very regular intervals – for example every 2 minutes. Results highlighted that Nightjar were using areas outside the heaths, often for extended periods. Multiple birds were using some locations and there appeared to be limited use of urban areas. The tagging surveys have been continuing and a ringing group has also been undertaking GPS tracking at other Dorset heathland sites. The complete results from these studies are likely to be available soon and should provide useful context for the Breckland SPA. The results should help clarify the ranges that Nightjar will roam and the risks from development in the wider area. In the absence of the complete results from the recent Dorset studies using GPS trackers, the original radio-tracking studies in Dorset provide the best guide as to the range that birds will travel off-site, with birds reported travelling up to 7km (Cresswell, 1996).
- 4.11 The Breckland SPA supported 415 churring males in 1998<sup>21</sup>, representing 12.2% of the then British population although this number had halved by 2010 (Henderson, Hunter and Conway, 2018). This decrease in the population is thought to be due to a corresponding decrease in the availability of suitable breeding habitat following the site's designation (Dolman and Morrison, 2012). It is considered that suitable breeding habitat was overly abundant at the time of designation, due to the timing of the forestry management/felling cycle, leading to a very high Nightjar population level.
- 4.12 Research carried out by Conway, Henderson, & Bolderstone (2015) upon Nightjars within Breckland SPA and Dersingham Bog has shown that birds at both localities frequently forage >500m outside of the heath/woodland habitat boundary and

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<sup>21</sup> [Natural England – Breckland Site Improvement Plan](#)

into neighbouring, non-designated, areas, in order to access grassland areas with a larger moth biomass. The conservation objectives for the SPA also clearly indicate that Nightjars breeding within the SPA potentially forage several kilometres outside of the SPA boundary.

- 4.13 We used 7km on a precautionary basis in the screening to identify those allocations that could be within a radius of birds from the Breckland SPA. 6 sites are located within 7km of the Breckland SPA: G35.1, G56.1, G88.1, G88.2, G88.3, MAR1. G35.1 is 70m from the SPA and the next closed is SPA boundary, with the next closest (G56.1) is 4.68km from the SPA. All sites comprise small scale allocations approximately 0.2ha to 1.5ha in extent and are located either completely within, or adjacent to, existing settlements. Given the indications from other sites, and potentially also from the emerging Dorset tracking study results, that Nightjars prefer to forage within semi-natural habitats and are likely to choose areas as close to the SPA as possible, it is therefore considered unfeasible that Nightjar will be negatively impacted by the individual loss of these small areas of potential foraging habitat, and adverse effects on integrity alone for each allocation can be ruled out.
- 4.14 Together, the allocations total less than 0.01% of the total land area within 7km of the SPA (excluding the SPA itself). There is only the one allocation within 4km. Given these scales of development, there is no credible evidence of a real risk that the allocations together will have a meaningful effect of Nightjar foraging. Further assessment considering in-combination effects with other plans and projects would not change the outcome of the assessment and adverse effects on integrity to Breckland SPA from loss of supporting habitat can therefore be ruled out alone or in-combination.

#### ***Ouse Washes SPA/Ramsar***

- 4.15 The Ouse Washes SPA is primarily designated for its waterfowl assemblage (and constituent species), alongside a small number of notable waders and raptors. The SPA interest overlaps with the Ramsar interest. The site regularly supports 5,000 Bewick's Swans during the winter (70% of the British wintering population) and 590 Whooper Swans (comprising 10% of the British population), although the peak 5 year count (2013/14 – 2017/18) for the latter species was 6,840. The site also supported an average of 12 wintering Hen Harriers at the time of its designation (comprising 2% of the British wintering population), but in recent years this has declined to an average of just a single wintering bird (Natural England, 2019).
- 4.16 Historically, wintering swans fed on grasses and aquatic vegetation, but periods of freezing weather and flooding in the 1970's induced behavioural changes which

saw the birds commence feeding within agricultural crops outside of the SPA boundary (Robinson, et al., 2004). By the middle of the decade the Ouse Washes reserves were primarily used as night-time roost sites, with feeding carried out almost exclusively within the agricultural areas surrounding them. The birds feed on a variety of crops, dominated by harvested potatoes and sugar beet, and most foraging is carried out in fields located within 10km of the Ouse Washes (Robinson *et al.*, 2004; Natural England, 2019). Foraging birds favour large, open, fields (>5ha in extent) with clear sight lines in order to avoid predators, and they are susceptible to collision risk with anthropogenic infrastructure (such as power lines) when commuting between daytime feeding and roosting localities.

- 4.17 Hen Harriers have traditionally roosted, and hunted, within the Ouse Washes but individuals can cover a large area in a single day when hunting during the winter months. The species predominantly preys upon small mammals during the winter, and it is therefore dependent upon habitats that support abundant small mammal populations (potentially including areas of agricultural set-aside, and other boundary features), as well as perches upon which to pluck and eat food. The drivers behind the extreme decline in the wintering Hen Harrier population with the Ouse Washes SPA are not however currently clear, although it is considered possible that extreme winter flooding of foraging areas could be a potential factor (Natural England, 2019).
- 4.18 As the importance of functionally-linked land will relate to its proximity to the SPA, we used 5km to trigger likely significant effects<sup>22</sup> and there were 4 allocations within this radius: G113.1, G113.2, G28.1 and G48.1. Two of these (G113.1 and G113.2) are located within 300m of the boundary. The 5 allocations cover a total area of 2.9ha, with the sites ranging between 0.3ha and 1.3ha in extent. All the allocations consist of areas of greenspace or previously developed land immediately adjacent to, or incorporated within, existing settlement boundaries.
- 4.19 The total extent of the 5 allocations located within 5km of the Ouse Washes SPA boundary comprises a tiny percentage of the total area of potentially suitable agricultural foraging habitat available for use by wintering swans. This is also applicable to wintering Hen Harrier, with the loss of a proportionately tiny area of potential foraging habitat considered unlikely to negatively impact the small number of birds using the site. It is therefore considered that any loss of habitat

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<sup>22</sup> We used a 5km buffer drawn around the SPA and it should be noted that the Ramsar covers a slightly different area, incorporating areas that are within the SAC and outside the SPA. As the functionally-linked land issue relates to the bird interest specifically, the SPA boundary was used.



within the footprint of these allocations will not lead to a significant adverse effect upon the qualifying features of the Ouse Washes SPA.

- 4.20 There is therefore no credible evidence of a real risk that the allocations together will have a meaningful effect of the qualifying features of the SPA/Ramsar. Further assessment considering in-combination effects with other plans and projects would not change the outcome of the assessment and adverse effects on integrity to the Ouse Washes SPA/Ramsar from loss of supporting habitat can therefore be ruled out alone or in-combination.

#### ***North Norfolk Coast SPA/Ramsar***

- 4.21 Wintering Pink-footed Geese and Dark-bellied Brent Geese are both qualifying features within the North Norfolk Coast SPA and these are also part of the Ramsar interest. There was a population of 9,000 individuals (comprising 7% of the European wintering population) of the latter species, and 6,000 of the former (6% of the European population) at the time of designation<sup>23</sup>. Brent flocks will generally forage within intertidal areas at the start of the winter, prior to moving onto coastal fields once intertidal food sources (such as Eel-grass) are depleted (Ward, 2004). The large flocks of Pink-footed Geese which roost within the SPA range widely across north and west Norfolk during the winter months, making use of large, inland, agricultural fields for feeding. The grazing marshes between Holme and Salthouse are favoured in most years, and flocks of >10,000 individuals can occur at key localities. The birds mainly feed on post-harvest sugar beet waste and winter cereal south of the SPA (Gill, 1996).
- 4.22 Use of individual fields by both species will be dependent upon a number of factors, including size and crop type/harvest status, and will potentially vary between years. Wintering geese preferentially utilise large field systems, with clear lines of site, for feeding to minimise predation risk. Potentially suitable fields lying outside of the SPA boundary may therefore provide supporting value to these SPA qualifying features. Winter Pink-footed Goose flocks are highly susceptible to disturbance, whilst Brents may prove relatively tolerant (Taylor, et al., 1999), and this should therefore also be considered with respect to the preferred site allocations.
- 4.23 The SPA supports c.30% of the UK breeding Marsh Harrier population, which has historically bred within wetland areas (i.e. reedbeds) within the SPA boundary. In recent decades the species has however started to additionally utilise arable crop fields as breeding sites, with a recent analysis indicating that as much as one fifth

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<sup>23</sup> [Natural England - European Site Conservation Objectives for North Norfolk Coast SPA](#)

of the breeding Marsh Harrier population may do so (Bennett, 2014). It is currently unclear, however, how many (if any) of the Marsh Harrier breeding population within the SPA sporadically use arable areas outside of SPA boundary for breeding sites, and Natural England's supplementary guidance indicates that there is currently no evidence that they are being impacted by human activity, if so.

- 4.24 Most of the allocations within the Plan are relatively small, with 59 <2ha in extent, and only 9 allocations exceeding 9ha in total area. All of the larger allocations, including the largest (E2.1- totalling 191.6ha), are located well to the south of the SPA boundary and directly adjacent to existing towns and villages. The smaller allocations located closer to the SPA boundary (including those in, Sedgeford, Hunstanton, and Heacham) are also located either adjacent, or incorporated within, existing built-up areas. Likely significant effects have been identified for 4 allocations – representing all those within 5km of the SPA boundary (F2.2, F2.3, and F2.5).
- 4.25 The small size of the majority of allocations, and/or their location in close proximity to existing housing, indicates that they will not be used by wintering Pink-footed Geese or breeding Marsh Harriers. Nevertheless, there is some (low) potential for wintering Dark-bellied Brent Geese to use the slightly larger fields located in proximity to the SPA boundary at the northern end of Hunstanton for example (i.e. F2.2. and F2.3) given the species apparent higher disturbance threshold. However, given the wide availability of similar coastal fields across the breadth of North Norfolk, it is considered that the loss of these proportionately small areas of potential supporting habitat are unlikely to negatively impact upon Brent Geese. Both sites are already under construction and have already been subject to checks through project-level HRA.
- 4.26 Adverse effects on integrity alone or in-combination can therefore be ruled out for the North Norfolk Coast SPA/Ramsar. There is no credible evidence of a real risk that the allocations together will have a meaningful effect of the qualifying features of the SPA. Further assessment considering in-combination effects with other plans and projects would not change the outcome of the assessment and adverse effects on integrity to the North Norfolk Coast SPA/Ramsar from loss of supporting habitat can therefore be ruled out alone or in-combination.

## **The Wash SPA/Ramsar**

- 4.27 The species and issues for this site are similar to the North Norfolk Coast SPA. Most of the allocations within the flight range and likely foraging areas are again on the edge of existing settlements or within the settlement boundary, including King's Lynn. Some of the allocations fall within 5km of both sites.

- 4.28 All sites have been checked using GIS and aerial images for indication they could support qualifying features of the SPA/Ramsar. This check has flagged one site that could require project level assessment and further checks: E3.1, an allocation for 575 dwellings at South Wootton, approximately 3.5km from the SPA/Ramsar boundary. The site has been subject to project level HRA. Here the habitat could support wintering wildfowl, including Brent Geese and the spread of the settlement towards the Wash poses risks with respect to further impacts on the fields outside the allocation boundary, directly to the west of the allocation and lying close to the SPA. Policy identifies the need for HRA at project level and the need to address green infrastructure and recreation impacts to nearby sites. As such consideration of the impacts of loss of supporting habitat will be addressed at project level and it will be possible to provide mitigation as the site is a mix of different fields and only some have the potential for use by wildfowl. Site design and layout will be able to ensure loss of habitat (and other impacts) are addressed. The site has been subjected to project level HRA and has been granted planning permission. Construction works on E3.1 are already underway, with the first dwellings having been delivered in 2023.
- 4.29 There is therefore no credible evidence of a real risk that the allocations together will have a meaningful effect of the qualifying features of the SPA/Ramsar. Further assessment considering in-combination effects with other plans and projects would not change the outcome of the assessment and adverse effects on integrity to the Wash SPA/Ramsar from loss of supporting habitat can therefore be ruled out alone or in-combination.

### **Conclusions: loss of supporting habitat/functionally-linked land**

- 4.30 Wide ranging bird species are qualifying features of a number of European sites within or close to the Borough and a number of different bird species are known to use habitat outside the European sites.
- 4.31 We identify one location where a need for project level HRA has been identified and this is highlighted in the Plan. Allocation E3.1 at South Wootton was subject to project level HRA through the development management process to check for impacts from loss of supporting habitat and ensure adequate mitigation is in place.
- 4.32 With the protective wording in place, adverse effects can be ruled out alone and in-combination given the scale of development and the allocation sites, all of which have been checked using GIS, knowledge of the relevant areas and the ecology of the bird interest. There is no credible evidence of a real risk that the allocations together will have a meaningful effect of the qualifying features of the Breckland

SPA (where risks relate to Nightjar), for the Ouse Washes SPA/Ramsar (where risks relate to Swans and raptors) and for the North Norfolk Coast SPA/Ramsar and the Wash SPA/Ramsar (where risks relate to geese and raptors). The risks are so small that further assessment considering in-combination effects with other plans and projects would not change the outcome of the assessment and adverse effects on integrity for all sites from loss of supporting habitat can therefore be ruled out alone or in-combination.

## 5. Appropriate assessment: General urban effects and avoidance of buildings

### Relevant policies from LSE screening

- 5.1 Screening at main modifications identified the overall quantum of growth (as set out in LP01 Spatial Strategy Policy) triggered likely significant effects alone with respect to general urban effects and avoidance of buildings for Breckland SPA, Ouse Washes SAC/SPA/Ramsar. Policy LP27 and LP19 set out zones with respect to the Breckland SPA and therefore, in accordance with *People Over Wind*, this policy must be considered at appropriate assessment.
- 5.2 Screening identified likely significant effects for the following policies alone in relation to general urban effects and avoidance of buildings:
- Breckland SPA: G35.1 (within 400m);
  - Ouse Washes SPA/Ramsar: G113.1 and G113.2 (both within 400m).
- 5.3 This broadly matches the pre-submission HRA screening, however the main Modifications remove a number of allocations that have been completed and therefore no longer need to be considered. These include two allocations at Brancaster and Brancaster Staithe very close to the North Norfolk Coast SAC/SPA/Ramsar (G13.1 and G13.2) which means urban effects are no longer relevant with respect to this HRA and the North Norfolk Coast SAC/SPA/Ramsar.

### Stone Curlew and buildings

- 5.4 This section of the appropriate assessment therefore focuses on impacts on Stone Curlew and the avoidance of buildings. Separate appropriate assessment sections of this report focus on urban effects and recreation.
- 5.5 For Stone Curlews, it was HRA work on the Breckland Core Strategy (Liley *et al.*, 2008) that identified likely significant effects from development within 1500m of the parts of the Breckland SPA relevant for Stone Curlew<sup>24</sup> or within 1500m of areas outside the SPA supporting notable numbers of Stone Curlews. The HRA was informed by work undertaken by Footprint Ecology (Sharp *et al.*, 2008). The use of a 1500m zone around the SPA to identify locations where likely significant effects would be triggered (and where adverse effects on integrity would be difficult to rule out) has been a consistent within planning policies for different local

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<sup>24</sup> Note the SPA also includes areas of forestry plantation that do not tend to support Stone Curlew but are included in the SPA because they support Nightjars and Woodlarks.

authorities around the Breckland SPA since. Further data analysis (Clarke and Liley, 2013) built on the previous findings, consistently finding avoidance of arable land by Stone Curlews around individual settlements across the Brecks. That work found significant effects out to at least 1500m and, when trying to separate different types of buildings, found some evidence that residential, rather than other types of building, were linked to the avoidance pattern found.

- 5.6 The analysis of Liley & Clarke was based on actual buildings, using GIS data representing the individual footprint of buildings extracted from GIS data. The predicted impact of a building was found to be greater where the present area of nearby buildings is low (i.e. greater impact for isolated buildings) and suggests that the total area covered by the nearby buildings has some influence over and above the simple number of nearby buildings. The analysis provides no indication of what factor or factors are behind the avoidance of built development by stone curlews, nor does the analysis provide any evidence of particular mitigation approaches and their effectiveness.

#### ***Mitigation in the Local Plan 2021 - 2040***

- 5.7 In order to avoid impacts of built development on Stone Curlews, the Local Plan Policy LP19 and a proposed Main Modification to LP27 both include the following wording: *New built development will be restricted within 1,500m of the Breckland SPA. Development will be restricted to the re-use of existing buildings or where existing development completely masks the new proposal from the Breckland SPA. Beyond the SPA, a 1,500m buffer will also be applied to areas where the qualifying features are known to exist, or where nesting attempts have been made. In this area, development may be acceptable where suitable alternative habitat (outside the SPA) can be secured.*
- 5.8 This wording provides clear protection and is in accordance with the approach adopted by neighbouring authorities. There is scope to further tighten the wording as there is potential ambiguity around development that is 'masked'. Within 1500m of the Breckland SPA (excluding the areas of conifer plantation that do not support nesting Stone Curlew), adverse effects can be ruled out if:
- Development is fully within an existing urban area (i.e. high levels of existing housing) and is completely masked from the SPA on all sides (i.e. infill development);
  - Development that is a re-development of existing building(s) and would not increase the existing footprint or intensity of use and potential detractors (such as noise, light, people).
- 5.9 There is one allocation within 1500m of the Breckland SPA, in Feltwell. This is an allocation for 50 dwellings, G35.1 Land to the rear of Chocolate Cottage, 24 Oak

Street. At the time of writing this had been granted planning permission for 18 dwellings (Phase 1), with an application for the second development phase (32 dwellings) expected to come forward around 2025. The pre-submission version of the Plan also included a second allocation in Feltwell (G35.3, for 10 dwellings), but this has been removed from the plan in the Main Modifications (site has been completed).

- 5.10 Feltwell is in close proximity to Weeting Heath and the area supports a high density of breeding Stone Curlews. The area adjacent to G35.1 is arable land and the proximity of the site to the SPA is shown in Map 5. It can be seen that the site is clearly surrounded by housing. The fields that are in particularly close proximity and are within the SPA are small and unlikely to be key areas for breeding Stone Curlew. The supporting text for the allocation (12.9.1.4) states that the site is surrounded on all sides by development and therefore completely masked from the SPA. The Plan states that project level HRA will be necessary and this should be able to rule out adverse effects on integrity, given the sites location. Given the scale of development and the proximity to the HRA, project level HRA will be essential and will need to consider in further detail building height, access for residents onto the adjacent parts of the SPA (checks on OS maps seem to indicate no public footpaths from close proximity of the allocations onto the SPA) and any further site specific details that might be relevant.
- 5.11 This is the only location within the 1500m buffer. Checks beyond the buffer indicate no allocations at sites in a wider arc where birds may be present outside the SPA boundary. The RSPB, in their representations on the pre-submission version of the Plan, highlighted concerns about G59.2, an allocation for 25 homes at Methwold (Land at Herbert Drive). The Main Modifications remove this allocation from the Plan and therefore it does not need to be considered further. Adverse effects on integrity for the Breckland SPA and Stone Curlews avoiding areas due to the effect of buildings can be ruled out, alone or in combination.

## Map 5: Feltwell Allocation (G35.1)





## General Urban Effects

- 5.12 Urban effects relate to issues where development is close to the European site boundary and is an umbrella term relating to impacts such as light, noise, cat predation, fly tipping, increased fire risk, spread of invasive species (e.g. from gardens and garden waste) and vandalism.
- 5.13 Studies of fire incidence have shown that heathland sites with high levels of housing within 500m of the site boundary have a higher fire incidence (Kirby & Tantram, 1999). Fires can start in a range of ways, including deliberate arson, children playing, campfires, barbecues, sparks from vehicles, discarded cigarettes etc.
- 5.14 Where housing is directly adjacent to sites, access can occur directly from gardens and informal access points. While we treat recreation use in a separate section, where development is adjacent to the European site, use will spill over from adjacent gardens and adjacent green space next to urban areas is often subject to a range of activities that are not necessarily compatible with nature conservation. Fly-tipping and dumping of garden waste can be more common. As such, managing and looking after such sites can be more challenging.
- 5.15 Of the sites at risk in King's Lynn and West Norfolk, urban issues are perhaps most relevant to heathland sites, which are vulnerable to fire, nutrient enrichment and heathland SPA sites hold sensitive ground-nesting birds. The issues are not restricted to heathlands however and can be relevant for a range of sites. For example, cats are known to predate a range of bird species (Woods, McDonald and Harris, 2003; Underhill-Day, 2005; Floyd and Underhill-Day, 2013), invasive species are a risk for a range of habitats including riparian ones.
- 5.16 Studies from the UK that compare densities of Nightjar and Woodlark along an urban gradient show that reduced densities occur where development levels are high (Liley and Clarke, 2003; Mallord, 2005; Liley *et al.*, 2006, 2007).
- 5.17 For Nightjar and Woodlark the various studies (Liley *et al.*, 2006; Liley & Clarke, 2003; Mallord, 2005) involve sites with public access. The reduced densities on sites with high levels of nearby housing may therefore relate to impacts from recreation (Mallord *et al.*, 2007; Murison, 2002) and/or other factors such relating to urban effects. As such urban effects are relevant for certain SPA sites as well as SAC sites where habitats are vulnerable.
- 5.18 The studies that show impacts on Nightjar and Woodlark have been conducted in areas where there is a high level of urban development surrounding heathland sites, for example in Dorset or the Thames Basin Heaths.

- 5.19 A development exclusion zone has been established around many other European sites to reflect the particular risks with development directly adjacent to the boundary. Local plans and strategic mitigation schemes include a presumption against development within these areas and such zones have become an established policy approach.
- 5.20 Examples of areas where a zone is established in planning policy include:
- Across the Thames Basin Heaths (11 local planning authorities)
  - Around the Dorset Heaths (five local planning authorities)
  - In the Brecks (e.g. Breckland District)
  - Around the East Devon Pebblebed Heaths (East Devon District Council)
  - Around Cannock Chase SAC (e.g. Cannock Chase Council Local Plan)
  - At Ashdown Forest SPA/SAC (e.g. Wealden District's Core Strategy Local Plan)
  - Burnham Beeches (e.g. Chilterns and South Bucks).
- 5.21 Most of the above examples are heathland sites and a 400m zone is used, however Burnham Beeches is a woodland site and the zone is 500m. The approach is widely accepted and reduces the risks from increasing urbanisation. It provides greater certainty that mitigation measures (such as access management) for cumulative levels of urban growth will be successful as such measures can be targeted to those travelling some distance.
- 5.22 The choice of 400m is based on the literature (summarised in Underhill-Day, 2005) and to some extent is a pragmatic choice. For example, 400m reflects distances at which sites will be 'local' and easily accessible from nearby housing and fits with the fire research outlined above. Studies of cat roaming behaviour have shown 400m to be an appropriate buffer width to limit cats in very urban environments (Thomas, Baker, & Fellowes, 2014), however in more rural areas cats can roam considerably further and some studies have suggested ranges over 2km for more rural situations (Hall et al., 2016; Metsers, Seddon, & van Heezik, 2010).
- 5.23 We have checked relevant European sites for allocations and the scale of growth around all European sites within 400m, i.e. very close to the site boundary.
- 5.24 The screening at Main Modifications identified the following:
- G35.1: Residential allocation of 50 dwellings in Feltwell, 70m from the Breckland SPA;
  - G113.1: Residential allocation of 4 dwellings in Welney, 10m from the Ouse Washes SPA/Ramsar;
  - G113.2: Residential allocation of 17 dwellings in Welney (already under construction), 270m from the Ouse Washes SPA/Ramsar.

5.25 G35.1 is considered earlier in this part of the appropriate assessment and impacts for Stone Curlew. The site is close to arable land within Breckland SPA and well away from SAC habitats and any habitat that might support Woodlark or Nightjar. Issues at this location would solely relate to Stone Curlew and adverse effects on integrity, alone or in-combination, are ruled out for that species in the earlier section.

5.26 G113.1 and G113.2 are both allocations in Welney and urban effects here would relate to the SPA and impacts to birds from the presence of buildings, lighting, cat predation and potentially the spread of invasive species from garden ponds etc. into the wetland habitats. There are no likely significant effects for the SAC as urban effects are not relevant for Spined Loach. The supplementary conservation objectives indicate low risk for urban effects in terms of landscape issues for the Ouse Washes SPA, suggesting the main risk from urban effects would relate to sight lines and constraining the open habitats required by the birds (Table 5). The two allocations in Welney are part of the settlement and will not result in obstruction to sight lines or visibility. Equally any impacts from lighting would be limited due to the location and could be resolved at project level HRA once site specific design elements were considered. Cat predation would be relevant only for the breeding bird interest when there are chicks present. Cat predation is not identified in the supplementary conservation advice and impacts can be ruled out as the Old Bedford River and Delph River limits access to much of the area of the SPA (crossing would be by the road bridges only) and then subsequent movement within the SPA by cats will be restricted by the ditches and water features. Given the low level of growth and the location, adverse effects on integrity to the Ouse Washes SPA from urban effects can be ruled out and as the risks are so small, the risks are ruled out alone or in-combination.

**Table 5: Supplementary conservation advice for the Ouse Washes SPA and potential urban effects**

Attribute	Attribute	Targets	Supporting/explanatory notes
Supporting habitat: structure	Landscape	<p>For A151 <i>Philomachus pugnax</i>; Ruff (Breeding), and A156a <i>Limosa limosa limosa</i>; Black-tailed godwit (Breeding), all breeding waders as part of the assemblage:</p> <ul style="list-style-type: none"> <li>• Maintain the amount of open and unobstructed terrain in the vicinity of nesting, roost and feeding sites.</li> <li>• Maintain view lines in feeding and roosting areas. Unrestricted views over 200m and effective field size greater than 10ha</li> </ul> <p>For <i>Cygnus cygnus</i>; Whooper Swan (Non-breeding), <i>Cygnus columbianus bewickii</i>; Bewick's swan (Nonbreeding) and <i>Anas penelope</i>; Eurasian Wigeon (Non-breeding):</p> <ul style="list-style-type: none"> <li>• Maintain an open and</li> </ul>	<p>These features are known to favour large areas of open terrain, largely free of obstructions, in and around its nesting, roosting and feeding areas. Often there is a need to maintain an unobstructed line of sight within nesting, feeding or roosting habitat to detect approaching predators, or to ensure visibility of displaying behaviour. An open landscape may also be required to facilitate movement of birds between the SPA and any off-site supporting habitat.</p>

unobstructed terrain in the vicinity of feeding or roosting areas • Maintain view lines in feeding and roosting areas. Unrestricted views over 500m and effective field size greater than 5ha

## Conclusions General urban effects and avoidance of buildings by Stone Curlews

- 5.27 Adverse effects on integrity for the Breckland SPA and Stone Curlews, through the avoidance of areas due to the effect of buildings can be ruled out, alone or in combination. Policy LP27 limits growth within 1500m of the SPA unless particular criteria are met, such as the development is fully within an existing urban area. Only 1 allocation is within 1500m of the SPA; at Feltwell (G35.1), and this location complies with the protective policy. It has already been granted planning permission for 18 dwellings (phase 1), with an application for the second development phase (32 dwellings) expected to come forward around 2025. A review of allocations outside the 1500m zone but within the potential area where development could impact on Stone Curlews that are using areas outside the SPA boundary indicates no risks. The policy ensures cumulative impacts are addressed and ensures in-combination effects can be ruled out.
- 5.28 Checks for all relevant European sites for housing growth within 400m indicates very low levels of growth and all allocation sites have been checked. The scale of growth and locations involved mean that urban effects can be ruled out for all European sites, alone or in-combination.

## 6. Appropriate assessment: Recreation impacts

### Relevant policies from LSE screening

- 6.1 Screening at main modifications identified likely significant effects for the following policies:
- Policy LP01: Spatial Strategy
  - New Policy: Residential development on windfall sites
  - New Policy: Neighbourhood Plans
  - LP07: The Economy Policy
  - LP15: Coastal Areas Policy
  - LP38: King's Lynn Policy
- 6.2 LP01, the new policies for windfall development and Neighbourhood Plans, and LP38 set the overall quantum of growth, distribution of housing etc. and alone trigger likely significant effects for all relevant sites. The new policies for windfall development and Neighbourhood Plans are, added as part of the main modifications, replacing policies LP02, LP04, LP31 and LP41 of the submission Plan. LP07 and LP15 promote tourism and the impacts of tourism trigger likely significant effects in-combination.
- 6.3 Likely significant effects were also triggered for the following allocations alone (identified due to their immediate proximity):
- G113.1 and the Ouse Washes SPA/Ramsar;
  - G113.2 and the Ouse Washes SPA/Ramsar.
- 6.4 For all allocations and relevant European sites there were also in-combination risks triggered to various European sites. The impacts relate to the overall quantum of growth and the GIRAMS is based on a county-wide mitigation tariff and mitigation approach. On a precautionary basis all allocations were therefore screened in for the following European sites: Breckland SPA/SAC, Ouse Washes SPA/Ramsar, Norfolk Valley Fens SAC, Roydon Common & Dersingham Bog SAC, Roydon Common Ramsar, Dersingham Bog Ramsar, The Wash SPA/Ramsar, North Norfolk Coast SAC/SPA/Ramsar and The Wash & North Norfolk Coast SAC.
- 6.5 Policy LP27 sets the need for mitigation for recreation impacts, and this is also referred to in policies LP15 and LP23 and therefore, in accordance with People Over Wind, the mitigation within these policies are also considered at appropriate assessment.

### Introduction

- 6.6 Postcode data from 2020 indicated around 74,118 residential properties within the Borough. The total allocation within the Plan (at pre-submission) of 6175 is therefore equivalent to around an 8% increase in the amount of housing. Such an increase in housing is likely to result in an increase in people, and therefore in recreational use.
- 6.7 In the UK there is considerable overlap between nature conservation and recreation. Many of our most important nature conservation sites have legal rights of access, for example through Public Rights of Way or Open Access through the Countryside and Rights of Way Act (CROW) 2000. People are often drawn to sites that are important for nature conservation as they are large, scenic and often few other alternatives exist. Recreation use can include a variety of activities, ranging from the daily dog walks to competitive adventure and endurance sports. There can be a difficult balancing act between providing for an increasing demand for access without compromising the integrity of protected wildlife sites.
- 6.8 There is a strong body of evidence showing how increasing levels of access can have negative impacts on wildlife. Visits to the natural environment have shown a significant increase in England as a result of the increase in population and a trend to visit more (O'Neill, 2019). The issues are particularly acute in southern England, where population density is highest. Issues are varied and include disturbance, increased fire risk, contamination and damage (Saunders *et al.*, 2000; Underhill-Day, 2005; Lowen *et al.*, 2008; for general reviews see: Liley *et al.*, 2010; Ross *et al.*, 2014).
- 6.9 The issues are not however straightforward. It is now increasingly recognised that access to the countryside is crucial to the long-term success of nature conservation projects, for example through enforcing pro-environmental behaviours and a greater respect for the world around us (Richardson *et al.*, 2016). Access also brings wider benefits to society that include benefits to mental/physical health (Pretty *et al.*, 2005; Lee and Maheswaran, 2011; Keniger *et al.*, 2013) and economic benefits (ICRT, 2011; ICF GHK, 2013; Keniger *et al.*, 2013; The Land Trust, 2018). Nature conservation bodies are trying to encourage people to spend more time outside and government policy is also promoting countryside access in general (e.g. through enhancing coastal access).

## Sites and vulnerable features

- 6.10 Sites and vulnerable qualifying features are summarised in Table 6. The table is primarily drawn from the site improvement plans and supplementary conservation advice for the relevant sites (Liley, 2008; Panter, Liley and Lowen, 2017; see also Hooton and Mills, 2020). It can be seen that there are a wide range of potentially

vulnerable interest features across multiple sites. Sites that are not included in the table are those SPAs and SACs where there are no qualifying features that might be considered at risk from recreation impacts, for example the Ouse Washes SAC.

**Table 6: European site qualifying features potentially vulnerable to recreation impacts. Table drawn from site improvement plan and supplementary conservation advice. Qualifying features underlined are SPA features that qualify as breeding species. The table does not include Ramsar sites as there is considerable overlap in the interest features and the supplementary advice/site improvement plans do not cover the Ramsar interest.**

European site	Qualifying feature	Additional information
<b>Breckland SAC</b>	H4030 European dry heaths H2330 Inland dunes with open <i>Corynephorus</i> and <i>Agrostis</i> grasslands H6210 Semi-natural dry grasslands and scrubland facies: on calcareous substrates ( <i>Festuco-Brometalia</i> )	Site improvement plan highlights that recreational and other activities have the potential to impact both SAC and SPA features. Disturbance does not currently appear to be significantly impacting the bird populations, but the impacts of increased recreational activity is uncertain. Recreational growth in Thetford Forest may impact on woodlark and nightjar. The forest is a major recreational attraction in the region. Similarly, military training activities have the potential to impact ground nesting birds, especially stone curlew, but the extent of this impact is unclear. SAC features may be affected through eutrophication (dog fouling, unauthorised fires) and disturbance of soils, in particular on commons and heaths.
<b>Breckland SPA</b>	A224 <u>European Nightjar</u> A246 <u>Woodlark</u> A133 <u>Stone-Curlew</u>	Supplementary conservation advice sets target that frequency, duration and/or intensity of disturbance affecting nesting and/or foraging birds should not reach levels that significantly affect the population of any of these species.
<b>Ouse Washes SPA</b>	A037 Bewick's Swan A038 Whooper Swan A050 Eurasian Wigeon A037 Eurasian Teal A054 Northern Pintail A056 Northern Shoveler A082 Hen Harrier Waterbird Assemblage A051 <u>Gadwall</u> A053 <u>Mallard</u> A056 <u>Northern Shoveler</u> A156a <u>Black-Tailed Godwit</u> Breeding Bird Assemblage	Supplementary conservation advice highlights that wildfowling, angling and other recreation activities occur. There are footpaths along the barrier banks. In general these are quiet because of the location of the site and difficult access, but there is significant disturbance immediately north of Earith, particularly from dog walkers. Numbers of visitors to the RSPB reserve at Manea are small and are unlikely to result in disturbance. Numbers of visitors to the WWT reserve at Welney are larger but access is restricted and disturbance is also unlikely there.
<b>Norfolk Valley Fens</b>	H4010. Northern Atlantic Wet Heaths with <i>Erica tetralix</i> ; H4030 European Dry Heaths S1014 Narrow-Mouthed Whorl Snail H6410 <i>Molinia</i> Meadows On Calcareous, Peaty Or Clayey-Silt-Laden Soils ( <i>Molinia</i> Meadows)	Wet heath and dry heath identified in the supplementary conservation advice as vulnerable to trampling and visitor management stated as important for <i>Molinia</i> meadow; none of these habitats are present at East Walton & Adcock's Common or Foulden Common the two relevant component SSSIs for this assessment. The snail is identified in the supplementary conservation objectives as vulnerable to eutrophication and exposure to leisure activities. Again the species is not present at East Walton & Adcock's Common or Foulden Common.
<b>Roydon Common &amp; Dersingham Bog SAC</b>	H4010. Northern Atlantic Wet Heaths with <i>Erica tetralix</i> ; H4030 European Dry Heaths	Neither site improvement plan or supplementary conservation objectives identify particular risks from recreation or set targets relating to impacts from recreation. Trampling, eutrophication and fire are all however risks for the qualifying habitats. While not part of the SAC interest, Nightjar and Hen Harrier are notable bird interest and important in their own right.



European site	Qualifying feature	Additional information
	H7150 Depressions on peat substrates of the <i>Rhynchosporion</i>	
<b>The Wash SPA</b>	A156 Black-Tailed Godwit A143 Red Knot A157 Bar-Tailed Godwit A144 Sanderling A149 Dunlin A160 Curlew A162 Common Redshank A169 Turnstone A193 <u>Common Tern</u> A195 <u>Little Tern</u> Waterbird Assemblage A141 Grey Plover A037 Bewick's Swan A040 Pink-Footed Goose A046a Dark-Bellied Brent Goose A048 Common Shelduck A050 Wigeon A051 Gadwall A054 Pintail A065 Common Scoter A067 Goldeneye A130 Eurasian Oystercatcher,	The site improvement plan identifies that The Wash, and North Norfolk oast is a very popular area for recreational activity and visitor numbers are likely to grow, for example as a result of the English Coastal Path and housing development. The range of recreational activities may have adverse impacts on the sites (Boating; motor boating; water skiing; jet skis; commercial and non-commercial wildlife tours; commercial shipping; kites (including surfers, boarders and buggy boarders); moorings; access to moorings; motorised vehicles; bikes, hovercraft; bird/wildlife watching; (dog) walking; Samphire collection, shellfish collection, bait digging, reed cutting, beachcombing, sea lavender gathering; beach barbecues; littering; wildfowling). Conflicts with the management of fragile habitats and species which can be easily disturbed by recreational activity will need to be carefully managed. To overcome these challenges further collaboration between stakeholders and local people may be needed with the aim of more holistic management of the area.
<b>North Norfolk Coast SPA</b>	A143 Red Knot A191 <u>Sandwich Tern</u> A193 <u>Common Tern</u> A195 <u>Little Tern</u> A040 Pink-Footed Goose A046a Dark-Bellied Brent Goose A050 Wigeon A021 <u>Bittern</u> A081 <u>Marsh Harrier</u> A084 <u>Montagu's Harrier</u> A132 <u>Avocet</u>	
<b>North Norfolk Coast SAC</b>	H1420 Mediterranean Saltmarsh Scrub H2110 Shifting Dunes	

European site	Qualifying feature	Additional information
	H2120 Shifting Dunes With Marram H2130 Dune Grassland H2190 Humid Dune Slacks.	
<b>The Wash &amp; North Norfolk Coast SAC</b>	H1110 Subtidal Sandbanks H1140 Intertidal Mudflats And Sandflats H1160 Shallow Inlets And Bays H1310 Glasswort And Other Annuals Colonising Mud And Sand H1330 Atlantic Salt Meadows H1420 Mediterranean Saltmarsh Scrub S1365 Common Seal	

## Recreational use of sites: visitor survey data

- 6.11 All the sites identified in Table 6 have a right of public access. Access infrastructure and provision does vary between sites however and it is notable that the Norfolk Valley Fen sites relevant to the Borough are likely to have particularly low levels of use. East Walton & Adcock's Common SSSI lies within the Borough and is a component of the Norfolk Valley Fens SAC. Walton Common has a public footpath running along the edge and the site appears as open access land on Ordnance Survey maps as it is a common. The site is however very rural in character and setting and is not promoted or signposted in anyway. Foulden Common SSSI is just outside the Borough and again is mapped as open access on Ordnance Survey maps. The site is bisected by a lane but otherwise there is no access infrastructure and the terrain is very wet, meaning much of the site is inaccessible.
- 6.12 Visitor survey data from relevant European sites within Norfolk were collected by Footprint Ecology in 2015-16 (Panter, Liley and Lowen, 2017) in a strategic piece of work commissioned by Norfolk County Council. As part of the work, predictions were made of the potential increase in recreation use at different sites as a result of the indicative levels of growth anticipated at a county-wide scale at the time. These predictions suggested a potential 14% increase in access by Norfolk residents to the sites surveyed (in the absence of any mitigation), as a result of new housing anticipated during the current plan period. Increases were predicted to be most marked in the Brecks, where an increase of around 30% was predicted. Other relevant predictions at a European site scale were 9% for North Norfolk; 15% for Roydon & Dersingham and 6% for the Wash (note these figures relate to the surveyed access points only and to visits by Norfolk residents). While the Valley Fens were included in the visitor surveys, the component sites within King's Lynn and West Norfolk Borough were not surveyed and therefore it is not possible to draw conclusions relating to the Valley Fen sites in the Borough. Furthermore, the surveys did not cover the Ouse Washes.
- 6.13 The visitor work showed clear impacts of local housing growth on recreation use of the European sites. For parts of the North Coast however it was notable that high proportions of visitor use were tourists and the links between an increase in local housing and recreation impacts are less clear as these sites attract a high number of visitors coming from a wide geographical area, both inside and outside Norfolk.

## Norfolk-wide Green Infrastructure and Recreational Avoidance and Mitigation Strategy (RAMs)

- 6.14 Using the results of the visitor survey work a strategic, county-wide approach to mitigation was developed by the Norfolk Local Planning Authorities. This approach was set out in the Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy ('GIRAMS') (Hooton and Mills, 2020) and included green infrastructure (to draw visitor use away from European sites) and access management measures on the European sites themselves.
- 6.15 The green infrastructure strategy highlights the need for local planning authorities to secure the provision of green infrastructure at both a development site and plan-making level. Strategic opportunities for green space are identified and the strategy sets out criteria for Enhanced Green Infrastructure provision to ensure developers are aware of their responsibilities and to allow local planning authorities to audit their green infrastructure against the criteria.
- 6.16 The RAMs component includes a package of avoidance and mitigation measures:
- The provision of a 'Delivery Officer' with the role of managing the delivery of the mitigation;
  - The provision of a team of 'Rangers' to provide a presence at the European Sites particularly of the Broads, all three parts of the Coast and, when monitoring shows that this is a priority, in the Norfolk Brecks which could be extended to West Suffolk in the future. The role of Rangers includes informing visitors of the importance of the European Sites, and directing them to appropriate areas, giving walks, talks & attending partner events; providing promotional materials designed in conjunction with existing partners to make best use of their knowledge and experience;
  - Undertaking an Audit of Signage is proposed regarding appropriate access points to each European Sites; car park rationalisation may then be considered necessary in the future to manage the carrying capacity of these sensitive sites.
  - Monitoring commencement of residential developments especially locations e.g. within which LPA and individual site zones of influence;
  - Recording the implementation of mitigation and track locations and costs;
  - Collating and mapping key roosts and feeding areas outside the European Sites;
  - Sharing a new website dedicated to the Norfolk RAMS, providing information on the European Sites, the need for mitigation and measures to alleviate disturbance;
  - Setting up a county-wide 'dog project' to engage with dog walkers, promoting sites for dog walking, providing information on dog walking and highlighting issues at European Sites; build on existing use of dog bans & dogs on lead areas plus dog friendly beaches;

- Filling in gaps in data for European Sites to calculate individual ZOIs and continuous updating of 'Visitor Surveys' at selected locations to monitor effects and update the need for Rangers and any additional measures;
- The provision of literature regarding codes of conduct and pilots for zonation for those undertaking water sports at European Sites, including bait digging, power hang gliders, kayakers and kite surfers and the use of drones;
- Work identifying and providing strategic mitigation projects which are based on evidence and supported by data gathering undertaken in the Strategy and where there is a deliverable and identified need. Working with landowners and partners to support existing or identify new for fencing to protect breeding sites for Little Tern & Ringed Plover populations;
- Working with landowners and partners to collate bird monitoring surveys to identify land outside SPAs which support qualifying features;
- Monitoring of sensitive habitats & species;
- Working with the Public Rights of Way team on projects regarding route diversions.

- 6.17 GIRAMS was introduced in 2022. All the Local Planning Authorities in Norfolk commissioned further work relating to the RAMS in 2023. This new work, undertaken by Footprint Ecology, involved the production of a review of the recreation issues, zones and geographic context to the strategy and an action plan setting out more detailed mitigation including revised costings.
- 6.18 One of the drivers behind the new work was the recognition that the Covid pandemic had changed how people visit the countryside, their use local greenspaces and also highlighted the importance of local greenspace. There was also new context in relation to the Norfolk Coast. A study of the North Norfolk Coast and the Wash (Liley *et al.*, 2022) identified a new direction for visitor management and highlighted the need to reduce visitor numbers in a strategic way. It was also recognised that the potential housing numbers envisaged when the GIRAMS was produced (2020 – 2022) have also changed in the replacement Local Plan does not necessarily reflect the growth.
- 6.19 The GIRAMS has been the focus of a number of years of work and has involved dialogue with a range of stakeholders and partners, including Natural England who have welcomed the approach and are supportive. The strategy addresses both residential and tourist accommodation growth. The new action plan builds on the original GIRAMS study to set out detailed actions relating to mitigation measures on European sites. These actions were identified through consultation and liaison

with relevant delivery partners across Norfolk. It sets the basis for partnership working and the relevant organisations to work collectively.

- 6.20 The action plan, alongside the GIRAMS, is intended to ensure that relevant local authorities, as competent authorities under the Habitats Regulations, are able to rule out adverse effects on integrity (from increased recreation pressure associated with new housing growth), alone or in-combination for plan-led growth. The latest information and background to the GIRAMS can be found on the Council's website<sup>25</sup>.

## Considerations with respect to particular allocations

- 6.21 Housing in close proximity brings particular risks, as people can access sites from their front door and there is little scope to deflect or intercept them (i.e. reduced options for mitigation). Screening identified 2 allocations where likely significant effects were triggered alone. These are allocations within 400m of European sites and where there is public access onto the European site in close proximity to the allocation, for example within a short walk.
- 6.22 G113.1 and G113.2 are both in Welney; G113.1 is for at least 4 dwellings and G113.2 is for at least 17 dwellings, both are within the village, with construction of G113.2 already underway. There are good footpath links along the Old Bedford River at the south end of the village and G113.1 is within tens of metres of where the paths start. The paths run along the banks on either side of the River, essentially along the edge of SPA/Ramsar. The paths run on raised banks, and while these could provide the potential for people to be clearly visible on the skyline, risks are limited. This is because the path closest to the village is separated from the SPA/Ramsar by the river, a second bank, a second river (the River Delph) and tall trees which provide screening. Even the southern bank still has the River Delph and the trees providing screening. For any birds feeding out on the fields (i.e. outside the SPA), the options for disturbance are limited given the orientation of the footpaths. Given the low levels of housing and the specific details of the location, risks are low and the sites are deliverable without adverse effects on integrity. Policy for both allocations identifies the proximity of the European site and the need for further information provision, ensuring the project level HRA can address any localised risks and tailored mitigation (such as signage) be established if required.

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<sup>25</sup> See [https://www.west-norfolk.gov.uk/homepage/379/habitat\\_mitigation\\_rams](https://www.west-norfolk.gov.uk/homepage/379/habitat_mitigation_rams) (accessed 19th June 2024)

- 6.23 The GIRAMs applies a county-wide tariff and works at a county-level to address the in-combination effects of recreation across all relevant European sites. Mitigation measures have been updated in the action plan to reflect the most recent estimates of housing growth (and the locations for that growth) across all authorities in the county. The county-wide approach to some extent bypasses the need to consider the levels of growth around each European site and link particular development to each site. Nonetheless it is important that mitigation does target those locations where changes in recreation use will occur. The more recent GIRAMs work reviewed the zones of influence and contains a series of maps with updated zones of influence. These maps indicate that virtually all parts of the Borough are outside the zone of influence for the Norfolk Valley Fens SAC. Appendix 5 shows which allocations fall within which of the zones of influence (as set out in the most recent GIRAMs action plan). It should be noted that there is no zone identified for the Ouse Washes as no visitor data exist.

## Mitigation within the Plan

- 6.24 The issues with respect to recreation pressure to the Norfolk sites have long been recognised (Liley, 2008). While many sites are nature reserves with a range of visitor management infrastructure in place and drawing visitors from a wide radius, many sites are also much more low-key with little infrastructure in place. Local housing growth around sites means access is likely to increase, involving activities such as dog walking which are not necessarily compatible with the nature conservation interest.
- 6.25 It is necessary for the Local Plan 2021 - 2040 to ensure there is sufficient mitigation and that – in accordance with the relevant guidance (Tyldesley and Chapman, 2021) that mitigation should be effective, reliable, timely, guaranteed to be delivered and as long-term necessary. The county-wide mitigation strategy provides the means to provide and secure the necessary mitigation. The Local Plan 2021 - 2040 references the green infrastructure strategy and RAMs in LP27. The need for mitigation is also cross-referenced in LP15 (Coastal Areas Policy) and LP23 (Green Infrastructure) clearly sets out the need for the RAMs and the role of green infrastructure in delivering mitigation.
- 6.26 Policy LP27 sets out the need for mitigation. The policy has been updated in the Main Modifications to no longer refer to an interim approach and to clarify that an index linked per dwelling tariff will be levied by the Council. The modifications ensure that mitigation, as set out in the GIRAMs, can be secured. With the RAMs in place and working smoothly, it is possible to conclude that adverse effects on integrity from recreation can be ruled out, alone or in-combination.

## Conclusions: Recreation Impacts

- 6.27 For all individual allocations, adverse effects on integrity can be ruled out alone for all European sites, given the distribution of those allocations and the specific vulnerabilities of the relevant European sites. Impacts from the overall quantum of growth within the Plan and the in-combination effects of growth with other local authorities cannot however be ruled out and mitigation is necessary and set out through the RAMs. Risks are identified for the following European sites:
- Breckland SPA/SAC;
  - Roydon Common & Dersingham Bog SAC, Roydon Common Ramsar, Dersingham Bog SAC;
  - The Ouse Washes SPA/Ramsar;
  - The North Norfolk Coast SAC/SPA/Ramsar,
  - The North Norfolk Coast & the Wash SAC, The Wash SPA/Ramsar,
- 6.28 The GIRAMs ensures residual impacts for these sites are addressed. It is therefore essential that the GIRAMs is formally in place and running smoothly.
- 6.29 Any risks for the component SSSIs for the Norfolk Valley Fens that fall within or in proximity to the borough can be ruled due to the qualifying features present, the locations of the sites and their accessibility, as set out in the GIRAMS action plan. As such adverse effects on integrity can be ruled out alone or in-combination.



## 7. Appropriate assessment: Water related impacts

### Relevant policies from LSE screening

- 7.1 Screening at main modifications identified likely significant effects alone for the following policies:
- Policy LP01: Spatial Strategy
  - New Policy: Residential development on windfall sites
  - New Policy: Neighbourhood Plans
  - LP38: King's Lynn Policy
- 7.2 LP01, the new policies for windfall development and Neighbourhood Plans and LP38 set the overall quantum of growth, distribution of housing etc. The new policies for windfall development and Neighbourhood Plans are added as part of the main modifications, replacing policies LP02, LP04, LP31 and LP41 of the submission' Plan. Risks relate to the following European sites which all have water-dependent qualifying features:
- River Wensum SAC, Ouse Washes SAC/SPA/Ramsar, the Norfolk Valley Fens SAC, Breckland SAC, Roydon Common and Dersingham Bog SAC, Roydon Common Ramsar, Dersingham Bog Ramsar, North Norfolk Coast SAC/SPA/Ramsar, The Wash & North Norfolk Coast SAC and the Wash SPA/Ramsar.
- 7.3 Screening identified likely significant effects for the following sites and policies alone:
- Ouse Washes SAC/SPA/Ramsar: G113.1 and G113.2;
  - Roydon Common and Dersingham Bog SAC (and relevant Ramsar sites): G29.1;
  - River Wensum SAC (G31.1, G42.1).
- 7.4 These screening findings broadly match those of the pre-submission version of the Plan. However, a number of allocations have been removed from the Plan and are therefore no longer flagged as a concern. In addition, since the pre-submission version HRA work, water quality has become a key issue for Norfolk authorities with advice from Natural England relating to the need for nutrient neutrality for a number of European sites, of which the River Wensum SAC is of particular relevance here.

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- 7.5 Run-off, outflow from sewage treatments and overflow from septic tanks can result in increased nutrient loads and contamination of water courses. This can have consequences for European sites which contain wetland or aquatic features, as the pollution will affect the ability of the site to support the given interest.
- 7.6 Furthermore, abstraction and land management can influence water flow and quantity, resulting in reduced water availability at certain periods or changes in the flow. This can exacerbate issues relating to water quality.
- 7.7 These impact pathways can be specific to particular parts of European sites or particular development locations and are also relevant to the overall quantum of development.
- 7.8 Relevant sites where there are water dependent qualifying features are summarised in Table 7.

**Table 7: Water related issues identified in relevant site improvement plans for different European sites. Site names used are those used for the site improvement plan which can relate to multiple designations**

Site	Diffuse water pollution	Hydrological functioning	River restoration	Water abstraction	Notes
Breckland	✓				Meres are showing signs of nutrient enrichment
Norfolk Valley Fens SAC	✓	✓		✓	Water levels are currently not favourable on the entire SAC and some ditches are not adequately managed. There is a possible impact of nutrient loading from diffuse water pollution from surrounding land and abstraction issues have been identified at East Walton and Adcock's Common.
The Wash and N. Norfolk Coast		✓			Structures which control water along the North Norfolk Coast have fallen into disrepair. The issue is preventing appropriate water level controls for breeding birds
Ouse Washes SAC/SPA/Ramsar	✓	✓			Increased flooding causes numerous problems, particularly for breeding bird interest. Inappropriate levels of nutrients from diffuse pollution in combination with inappropriate water levels from flooding have adversely affected the extent/composition of vegetation communities on the washes. Occasional incidences of low oxygen levels on River Delph and Counter Drain have potential to impact spined loach populations.
River Wensum SAC	✓		✓	✓	Much of the river channel has been modified by artificial enlargement (over deepening, over widening and straightening). The extent of modification has been identified as part of the river restoration strategy. Water quality issues affect all SAC features. There are adverse impacts on water quality from discharge, pesticides and nutrients entering the river from the catchment. Abstraction is adversely impacting the flow regime of the river. Changes to abstraction licences to relieve pressure on the river have been identified through the Review of Consents.
Roydon Common & Dersingham Bog SAC / Dersingham Bog Ramsar/ Roydon Common Ramsar	✓	✓			The SAC is at risk from changes in hydrology through drought and abstraction. There is some evidence of dehydration, although it is not clear if there is currently an impact on the site from current abstraction. Lack of ditch maintenance has resulted in ditches overflowing and contaminating mire habitats with nutrient enriched water from the ditch. Ditch management is being undertaken and will need to be carried out on a rolling programme. There are effects on water chemistry from agricultural activities within the catchment. There was also a pollution incident in 2012 when a pumping station was overwhelmed and raw sewage entered the site.

## Water supply: general considerations

- 7.9 It is the role of the Environment Agency to make sure that abstraction is sustainable and does not damage the environment. Water abstraction is managed through a licensing system originally introduced by the Water Resources Act 1963.
- 7.10 The Environment Agency is the competent authority for the Water Framework Directive and it oversees the publication of River Basin Management Plans which are a requirement of the Directive. These plans set out how the management of water bodies will be undertaken, the roles of relevant bodies and the steps undertaken to ensure environmental targets are met.
- 7.11 The first River Basin Management Plans were produced in 2009 and then updated in 2015. In the more recent, second cycle river basin management plans the Environment Agency has committed to ensure abstraction licensing strategies and actions fully incorporate all environmental objectives and align with river basin management plans. The Agency will assess all licence applications and only issue licences that adequately protect and improve the environment. They will only grant replacement licences where the abstraction is environmentally sustainable and abstractors can demonstrate they have a continued need for the water and that they will use it efficiently. In addition, for existing licences, the Agency will prioritise actions to protect and improve Natura 2000 sites and address the most seriously damaging abstractions during this plan period. All abstractors in surface water and groundwater bodies where serious damage is occurring or could occur without action should expect that their licences will be constrained over the next 6 years.
- 7.12 The Water Act 2003 introduced a legal requirement into the Water Industry Act 1991 for water companies to prepare, publish and maintain Water Resources Management Plans (WRMPs). WRMPs set out how a sustainable and secure supply of clean drinking water will be provided. The 2024 WRMPs produced by Anglian Water<sup>26</sup> predicts demand for water and issues around supply. The WRMP shows the regional water supply is under significant pressure from population growth, climate change, sustainability reductions and the need to increase resilience against drought. The Plan suggests that by 2050 there will be 38% less water for Anglian Water to supply to its customers and that 23 out of the 27 of the company's Water Resource Zones will have a deficit of water by 2050 if no actions is taken.
- 7.13 In order to address the issues around water supply, the plan identifies how demand management and new supply-side options can deliver a supply and

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<sup>26</sup> <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp/revise-draft-wrmp24-main-report-v2.pdf>

demand balance for all water resource zones at all times throughout the planning period (2025-2050). The 2024 WRMP has been subject to HRA<sup>27</sup> which was unable to rule out likely significant effects from the various options within the WRMP to a range of European sites prior to mitigation. The HRA goes on to conclude that, with the proposed mitigation measures implemented, Anglian Water can ascertain beyond reasonable scientific doubt that the proposed WRMP will not adversely affect the integrity of any Habitat Site alone or in combination with other plans or projects.

7.14 In line with the HRA Handbook (Part C12) and relevant government guidance<sup>28</sup> relating to competent authority co-ordination, this HRA can adopt the reasoning, assessment and conclusion of that the Anglian Water HRA in respect of on the basis that:

- No material information has emerged which would render the reasoning 'out of date', and
- The analysis underpinning the reasoning is sufficiently rigorous and robust.

## Wastewater: general considerations

7.15 Wastewater or sewage can be very damaging to water bodies as it can contain large amounts of nutrients (such as phosphorus and nitrates), ammonia, bacteria, harmful chemicals and other damaging substances. Issues arise where sewage treatment technology to adequately reduce levels of phosphorus and harmful chemicals is not in place, where leakages occur from privately owned septic tanks and, in wet weather, storm overflows can discharge untreated sewage. Poorly installed domestic washing machines and even washing cars at home can, in places, also add to the pollution load. Outcomes can include increased turbidity, algal blooms, reduced dissolved oxygen and an overall increase in the nutrient status of receiving waterbodies. Simply, increases in housing increase pressure on the sewage network and the volume of wastewater.

7.16 The pollution of inland and coastal waters has received greater recognition in recent years and the significance of such potential impacts and the need to

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<sup>27</sup> <https://www.anglianwater.co.uk/SysSiteAssets/household/about-us/wrmp/revised-draft-wrmp24-environmental-report-sub-report-a---hra.pdf>

<sup>28</sup> Defra guidance on competent authority coordination under the Habitats Regulations. This guidance is now withdrawn and has been replaced by the general guidance on the Habitats Regulations which includes a section on competent authority coordination <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>

mitigate has been given emphasis by Natural England's demands that new development affecting vulnerable water bodies must achieve 'nutrient neutrality', ie avoid any net increase in nitrate and phosphate pollution. Whilst this relates primarily to the disposal of foul water, run-off from hard surfaces can also be a factor. This reflects contemporary case law (the Dutch case) which makes clear that where water quality targets of European sites are not being met, further inputs of pollutants should not be allowed.

- 7.17 For the avoidance of doubt, in Norfolk, the River Wensum SAC and the Broads are subject to these measures, while a range of other statutory and policy drivers apply at other sites.
- 7.18 Anglian Water provides wastewater treatment for new development within the Borough and this is typically delivered by ensuring there is adequate capacity or headroom within the wastewater treatment system. It is to be expected that all existing wastewater treatment works that lie within the catchment of the relevant European sites operate within their licensed conditions and that all have capacity to accommodate predicted levels of growth. Licenses for all wastewater treatment works and any changes to these would have been subjected to project-level HRAs and would not be permitted to operate if adverse effects could not be ruled out.
- 7.19 Anglian Water has recently produced its first Drainage and Wastewater Management Plan (DWMP)<sup>29</sup>. DWMPs provide the basis for integrated long-term planning relating to drainage, flooding and protection of the environment. These will inform the approach to wastewater management over the next twenty-five years (2025-2050).
- 7.20 Given their particular knowledge of and responsibilities for the water environment, the water company and the Environment Agency are the competent authorities best placed to assess the impact of the disposal and the subsequent management of foul water, not the Council. The DWMP and any accompanying assessment can therefore be expected to play an important role in the shape, content and direction of the Local Plan.
- 7.21 No HRA has been conducted for the Anglian Water DWMP and as such there is no formal HRA that the Council can rely on. Nonetheless, the DWMP has been subject to detailed consultation and an environmental assessment to understand potential environmental impacts of different options.
- 7.22 The final plan assumes a proportionate level of growth (based on predictions of housing and population change through to 2045), protection to two degrees of

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<sup>29</sup> see: <https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/drainage-wastewater-management-plan/>

climate change, addresses flood and pollution risk in over 200 catchments and addresses treatment work compliance in almost 100 catchments. The plan sets out the strategic direction for management of wastewater and meets storm overflow discharge reduction targets. The DWMP will require a 25-year spend of up to £5 billion. The measures have been fed into Anglian Water's business plan.

### Detailed consideration of different European sites

#### **Breckland SAC**

- 7.23 The Breckland meres in Norfolk represent natural eutrophic lakes in the east of England. They are examples of hollows within glacial outwash deposits and are fed by water from the underlying chalk aquifer. Natural fluctuations in groundwater tables mean that these lakes occasionally dry out. The flora is dominated by stonewort – pondweed Characeae – Potamogetonaceae associations.
- 7.24 The meres are fed from the water table and water levels vary in relation to seasonal weather with a time delay of up to several months. Peak water levels tend to be around May but vary between sites and between years. Water levels tend to vary by up to 3 metres and the lack of a consistent shoreline results in a typical bowl-shaped or saucer-shaped form.
- 7.25 Given their isolation from other water bodies and lack of direct hydrological connectivity to the surroundings, the meres are not vulnerable to impacts from run-off or pollution that could be linked to development. The meres are surrounded by other SAC habitats and the SPA and as such they are protected from nearby development. Although, water abstraction from the water table could affect the hydrology of the meres, the supplementary conservation objectives indicate that there has not been any increase in dry periods compared to the past.
- 7.26 As such adverse effects on integrity to the Breckland SAC from water related issues can be ruled out, alone or in-combination. The lack of impact means no risk of residual effects and no in-combination effects are possible.

#### **Norfolk Valley Fens**

- 7.27 The SAC is comprised of 14 valley-head spring-fed fens scattered across central and North Norfolk. Only two component SSSIs are relevant to this assessment: East Walton & Adcock's Common and Foulde Common. The other Valley Fen sites are well outside the Borough boundary with no possible hydrological link.
- 7.28 Both East Walton & Adcock's Common SSSI and Foulde Common SSSI qualify as part of the SAC for the presence of H7230 Alkaline Fens; H91E0 Alluvial forests with Alder and Ash; H7210 Calcareous fens with Cladium and H6210 Semi-natural dry grasslands on calcareous substrates. In addition, East Walton & Adcock's Common SSSI qualifies for the presence of Desmoulin's Whorl Snail *Vertigo moulinsiana*.
- 7.29 For all these qualifying features, the supplementary conservation advice identifies the need to restore natural hydrological processes to provide the conditions necessary to sustain the feature within the site. Changes in source, depth, duration, frequency, magnitude and timing of water supply can have significant



implications for the assemblage of characteristic plants and animals present. High water levels are thought to be particularly important for the snail, which requires moist ground conditions throughout the summer.

- 7.30 Hydrological and botanical surveys were undertaken by the Environment Agency in 2007 in order to inform the review of consents process and since then monitoring has continued, to that it is possible to interpret changes in the fens in the context of water abstraction and climate change. Nonetheless it seems the hydrology of these sites is relatively complex and to some extent poorly understood.
- 7.31 The supplementary conservation advice does not identify specific component SSSIs as showing any evidence of nutrient enrichment and broadly indicates that there appears to be little risk to these sites, which are fed by groundwater. The site improvement plan identifies water pollution as a threat, but the issues relate primarily to agriculture and surrounding land use and furthermore are not identified for the component SSSIs relevant to King's Lynn and North West Norfolk.
- 7.32 In relation to abstraction, existing licences have been shown to adversely affect East Walton and Adcock's Common and these should have been addressed through the review of consents process and the translocation of the relevant bore holes. No further boreholes or abstraction are identified in the Local Plan 2021 - 2040 that would relate to this site.
- 7.33 Abstraction and pollution are therefore risks for the Norfolk Valley Fens and the hydrology of the sites are not necessarily fully understood. There are however few allocations in proximity to the SAC (none within 2km, 5 small allocations totalling 60 dwellings 2-5km radius). The abstraction issues identified for the sites are addressed through the review of consents process and the scale of growth proposed cannot further influence the hydrology of the sites. Adverse effects on integrity can therefore be ruled out alone or in-combination.

### ***The Wash and North Norfolk Coast***

- 7.34 For the coastal sites, many of the habitats and interest are dependent upon coastal processes however there are also qualifying features that depend on freshwater and water related impacts are possible.
- 7.35 Supplementary conservation advice for the North Norfolk Coast SAC and for the Wash and North Norfolk Coast SAC sets a target to maintain the natural flow regime of the river to that close to what would be expected in the absence of abstractions and discharges (the 'naturalised' flow) for Otters. The supporting notes identify that there is a lack of evidence that the feature is being impacted by any anthropogenic activities.

- 7.36 For the North Norfolk Coast SPA and for the Wash SPA a number of qualifying features such as Bittern, Marsh Harrier, Common Tern and the waterfowl assemblage are dependent on freshwater or habitats fed by freshwater. Changes in source, depth, duration, frequency, magnitude and timing of water supply or flow can have important implications for these feature. Such changes may affect the quality and suitability of habitats used by birds for drinking, preening, feeding or roosting.
- 7.37 For Otters and a number of qualifying features of the SPA targets also relate to water quality/quantity and the need to maintain them to a standard that supports the interest feature. The advice identifies that risks of eutrophication across the site have been assessed as low.
- 7.38 The site improvement plan identifies the need to review water level management across the freshwater marshes of the sites to make them more adaptable to climate change and identify new sites for potential freshwater habitat creation. Levels of development within the Local Plan 2021 - 2040 adjacent to the coastal sites are very low and all are within or part of settlements, such that there is no risk to the hydrology of coastal sites or any risk of sites being lost that could in the future provide for habitat creation.

#### ***Ouse Washes SAC/SPA/Ramsar***

- 7.39 The supplementary conservation advice for the SPA highlights that for many of the SPA features which are dependent on wetland habitats supported by surface and/or ground water, maintaining the quality and quantity of water supply is critical. Poor water quality and inadequate quantities of water can adversely affect the availability and suitability of breeding, rearing, feeding and roosting habitats.
- 7.40 The Ouse Washes is a designated flood water storage reservoir, and levels of flooding have been increasing for several decades. This creates challenges for maintaining the qualifying species, both those wintering and those breeding.
- 7.41 Over winter, floods are deeper and more extensive. This isn't a problem for wintering species that mainly use the washes for roosting, such as the swans, but those species that require shallow water on the Washes for feeding, such as dabbling ducks, numbers have dropped. Flood water also tends to persist into the breeding season, causing unsuitable conditions for nesting, either through standing water itself or increasing graminoid species indicative of waterlogging. Deep, long-lasting floods may also reduce the soil invertebrates that are important food for waders in the breeding season.

- 7.42 The supplementary conservation advice states that water quality data from 2015 showed that the water quality in the field drains is too high in phosphates. Water quality in the Bedford Ouse River supplying the Washes is highly variable, but average phosphorus levels, despite improvements over recent decades, are still several times higher than the target 0.1mg/l. Nitrogen levels are also high.
- 7.43 There is a Water Level Management Plan that details the water levels required to maintain good conditions for the breeding bird features. A review of the Diffuse Water Pollution Plan is also underway. The supplementary conservation advice states that further evidence is needed to define targets for nitrogen and phosphorus, which should be included in the updated Diffuse Water Pollution Plan (when published).
- 7.44 The Spined Loach (the qualifying feature for the SAC) is a bottom-living fish that has a restricted microhabitat associated with a specialised feeding mechanism. They use a complex branchial or gill apparatus to filter-feed in fine but well oxygenated sediments. Optimal habitat is typically standing or slow-moving open water with a patchy cover of submerged (and possibly emergent) plants which are important for spawning during summer, and a sandy or silty substrate into which juvenile fish tend to bury themselves when inactive.
- 7.45 The supplementary conservation advice for the SAC sets targets relating to water quality and nutrients, organic and other pollutants and flow. These targets all relate to maintenance of the current conditions.
- 7.46 The hydrological issues at the Ouse Washes therefore resolve around the high water levels from the flooding and the high nutrient loads, which will relate to run-off from surrounding agricultural use. The growth proposed in the Local Plan 2021 - 2040 will not impact the flood water levels or the general water quality. There is one allocation, G113.1 that is directly adjacent to the SPA and SAC on brownfield land in Welney and another allocation G113.2 set further back in the village but still in close proximity. Risks with these sites could relate to contamination during construction and in the long-term run-off/drainage issues affecting adjacent ditches and freshwater habitat. These issues can be resolved through careful design and project-level HRA. For both allocations the Local Plan 2021 - 2040 states that a Flood Risk Assessment will be required and any proposal should also be accompanied by sufficient information, including drainage arrangements, to demonstrate that there will be no adverse effect on the Ouse Washes SAC, SPA or Ramsar. As such, adverse effects on integrity at the plan level can be ruled out alone or in-combination as any risks can be identified and resolved at the project level.

***Roydon Common & Dersingham Bog SAC / Dersingham Bog Ramsar/ Roydon Common Ramsar***

- 7.47 Roydon Common and Dersingham Bog are separate sites around 3 miles apart and they represent the only remaining vestiges of what was once an extensive mosaic of heathland, mire and fen linking the north Norfolk coast to the Brecks. The support a complex range of vegetation communities encompassing acid mire, fen and transition mires.
- 7.48 The supplementary conservation advice for the SAC states that variations in water inputs to the site have resulted in the formation of an exceptionally diverse mosaic of vegetation types. Many of the species and communities which the SAC supports are highly sensitive to changes in water supply (volumes and timing), water chemistry (pH, base-status) and water quality (nutrient status). Even small changes to the hydrology and hydrochemistry of the waters which feed the site can exert significant detrimental effects on the species and communities it supports. The two component parts of the SAC are small fragments of what was extensive habitat and what remains has been impacted by surrounding land-use and drainage. The supplementary conservation advice recognises that the long-term restoration of the SAC requires renaturalisation of the hydrological processes, in terms of both water quality/chemistry and the water supply mechanisms, including groundwater and surface water regimes.
- 7.49 There are two qualifying habitat features that are particularly water dependent: wet heathland with cross-leave heath and depressions on peat substrates of the Rhynchosporion. The habitats are however complex and it is the transitions and mosaics that are an important feature for the site. As such water issues are also relevant for the dry heathland. The supplementary advice sets targets for the restoration or maintenance of water quality and hydrology for all three habitat features.
- 7.50 The site improvement plan identifies risks from abstraction and sets out a need for investigation into the impacts of abstraction and Dersingham Bog, monitoring at both sites and remedial actions to reduce impacts of drought. In addition, monitoring is also identified as an action to determine the levels of Nitrogen and Phosphorous in the groundwater and to make recommendations to eliminate impacts.
- 7.51 The Local Plan include an allocation in close proximity of the SAC:
- G29.1: 20 dwellings at Dersingham, 1.01 km from the SAC.
- 7.52 Policy wording for this site identifies the need for project level Habitats Regulation Assessment and the provision of suitable mitigation where necessary. This ensures

necessary hydrological checks are made and any issues relating to drainage or hydrology adequately resolved in the site design.

### ***River Wensum SAC***

- 7.53 Flow targets are set in the supplementary conservation advice and have been agreed by Natural England and the Environment Agency as part of the agency's River Basin Management Plan (RBMP). This sets out a two stage approach which will meet SAC standards for low to moderate flows in the upper reaches with less stringent targets at higher flows and downstream reaches identified and to be delivered through subsequent Asset Management Plans (AMP). Overall water resource management is guided by the Environment Agency's Review of Consents. This identified that the upper reaches are over-licensed but historic usage has not exceeded flow targets.
- 7.54 Phosphate pollution is a particular concern on the River Wensum and the supplementary conservation advice sets a target to restore the natural nutrient regime of the river. The objectives identify that 26% of the Phosphorous entering the whole catchment is from sewage treatment works and 18% from urban sources. The data are broken down in the Water Pollution Plan and Action Plan (Atkins, 2015) which highlights that, in the upper reaches of the Wensum, at least those areas relevant to the Local Plan, sewage works contribute a tiny proportion of the phosphate and the proportion of the overall phosphorous from urban issues is also very low.
- 7.55 Natural England wrote to the Council in March 2022 (i.e. after the pre-submission version of the Plan was produced), concerning nutrient pollution and in particular the River Wensum SAC. The letter advised that new development within the catchment the site, comprising overnight accommodation has the potential to cause adverse impacts with regard to nutrient pollution.
- 7.56 Relevant sewage treatment works on the Wensum include East Rudham and Sculthorpe and there are two allocations that fall within the Wensum catchment: 10 dwellings at G31.1 East Rudham and 10 dwellings at G42.1 Great Bircham and Bircham Tofts. The main modifications include specific wording for these allocations, with development dependent on fulfilling Natural England's Nutrient Neutrality requirements by providing suitable mitigation.

- 7.57 The Council have provided guidance on their website<sup>30</sup> on the need for Nutrient Neutrality, including where it is required and how mitigation can be secured. The catchment area comprises a relatively small and rural part of the Borough.

## Conclusions: Water-related impacts

- 7.58 Various European sites have water-dependent qualifying features which could be affected by development. Adverse effects on integrity from water-related issues are ruled out alone or in-combination for the: Ouse Washes SAC/SPA/Ramsar, the Norfolk Valley Fens SAC, Breckland SAC, North Norfolk Coast SAC/SPA/Ramsar, The Wash & North Norfolk Coast SAC and the Wash SPA/Ramsar. Adverse effects on integrity for all these sites are eliminated due to the scale of growth, the locations in relation to the European sites and qualifying features and through protective measures established through the review of consent/licensing of abstraction and management of water quality as controlled by the statutory agencies.
- 7.59 Natural England has raised particular concerns about the River Wensum SAC and any development coming forward in the catchment of the SAC must avoid any further pollution of the river. There are two small allocations (G31.1 and G42.1) that fall within the catchment of the River and policy wording ensures these will only come forward if they can demonstrate nutrient neutrality. As such any risks to the River Wensum SAC are eliminated.
- 7.60 For Roydon Common and Dersingham Bog SAC there is an allocations in close proximity (around 1km from the SAC): G29.1. Policy wording identifies the need for project level Habitats Regulation Assessment to check for hydrological issues with respect to the SAC/Dersingham Bog Ramsar site. This will ensure necessary hydrological checks are made and any issues relating to drainage or hydrology adequately resolved in the site design.

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<sup>30</sup> See [https://www.west-norfolk.gov.uk/info/20000/planning\\_and\\_development/956/nutrient\\_neutrality](https://www.west-norfolk.gov.uk/info/20000/planning_and_development/956/nutrient_neutrality) (accessed 19th June 2024)

## 8. Appropriate assessment: Air quality

### Relevant policies from LSE screening

- 8.1 Screening identified effects alone relating to the overall quantum of growth (as set out in Policies LP01, xx, xx and LP38) and air quality for the following European sites: Roydon Common & Dersingham Bog SAC, Dersingham Bog Ramsar, North Norfolk Coast SAC/SPA/Ramsar, The Wash and North Norfolk Coast SAC, Breckland SAC/SPA and the Ouse Washes SAC/SPA.

### Introduction

- 8.2 Increased growth within Local Plans is of relevance to HRAs where increased traffic volumes - as a result of new growth - will occur in close proximity to European sites hosting habitats that are sensitive to reduced air quality.

#### *Summary of atmospheric pollution*

- 8.3 Atmospheric pollutants of concern to sensitive habitats that are derived from vehicles include oxides of nitrogen (NO<sub>x</sub>), ammonia (NH<sub>3</sub>) and the consequential deposition of nitrogen (N) and acid, which can then lead to changes in species composition and mortality.
- 8.4 It is known that traffic emissions lead to an increase in N, and that this presents a major concern for sensitive habitats. Critical thresholds, beyond which plant communities may change in response to pollutants, have been developed for a range of habitat types, and are available from the [Air Pollution Information Service](#) (APIS). This database is funded and provided by the Centre for Ecology and Hydrology and the UK pollution and conservation agencies including Natural Resources Wales (NRW), the Environment Agency, Northern Ireland Environment Agency, Natural England, the Joint Nature Conservation Committee (JNCC), Scotland and Northern Ireland Forum for Environmental Research (SNIFFER), the Scottish Environment Protection Agency (SEPA), and Scottish Natural Heritage (SNH).
- 8.5 APIS holds data and threshold information specifically in relation to habitat sensitivity rather than human health. Summary information of relevance is given in Table 8.

**Table 8: Summary of key air pollutants**

Pollutant	Source	National trend	Impact
NO <sub>x</sub>	Combustion, mainly vehicles and power stations	Decline (55% since 1986)	Mainly through N deposition, but also gaseous NO <sub>x</sub> close to source. Synergy with SO <sub>2</sub>
NH <sub>3</sub>	Natural and anthropogenic; main source is agriculture	Smaller decline which has now flattened	Direct toxicity and N-accumulation

8.6 The main impacts of NO<sub>x</sub> and NH<sub>3</sub> are through N deposition and acidification. N deposition can lead to an increase in N loving species at the expense of other species; an increased risk of frost damage in spring, increased sensitivity to drought; increased incidence of pest and pathogen attack and direct damage to sensitive species. The impacts of acid deposition are often indirect, resulting from a change of pH in soils and water. Chemical changes lead to nutrient deficiencies, release of toxins and changes in microbial N transformations.

8.7 The implications of the Local Plan 2021 - 2040 in relation to air quality need to be assessed against background trends and the trajectory of vehicle emission improvements. Improvements in vehicular technology and standards that all vehicles are currently being manufactured to, may outweigh impacts from new development. The improvements may be retarded by additional development, but future background levels of nitrogen are expected to decline with Government clean air strategies and the target to stop the sales of new diesel and petrol cars by 2035.

## Case decisions and guidance

8.8 Case decisions provide an interpretation of the application of the Habitats Regulations and its parent European Directives in relation to air pollution and are useful in helping inform the assessment.

### *Guidance on assessing air quality impacts for designated sites*

8.9 The Design Manual for Roads and Bridges (DMRB) has been the standard source of guidance for considering traffic generated air quality impacts. The latest DMRB has a specific section (LA105) on air quality, and this highlights the potential for impacts on sensitive habitats within 200m of a road, and the need for further assessment where changes to the road network or traffic volumes might increase daily traffic flows by 1,000 Average Annual Daily Traffic (AADT) or more. This is a



simple measurement of change, using the total volume of traffic on a road and dividing it by 365 days to give a daily average.

- 8.10 Natural England and its partner UK statutory nature conservation bodies have a specialist air quality technical group known as the Air Quality Technical Advisory Group (AQTAG). This group regularly meets to discuss key issues in relation to air quality concerns for designated sites and will occasionally issue formal advice notes on key topics. AQTAG21 is an advice note that includes reference to a 1% threshold to be used in air quality assessments. This threshold has been consistently used by the statutory nature conservation bodies over a number of years to indicate where an increase in atmospheric pollutant might be deemed significant. The AQTAG21 refers to a 1% threshold in terms of the relevant critical load for the habitat type. Where the pollutant contribution is less than 1% of the critical load, it is deemed to be inconsequential (*de minimis*) and does not warrant further consideration for likely significant effects.
- 8.11 The Institute of Air Quality Management published guidance in June 2019 entitled 'A Guide to the Assessment of Air Quality Impacts on Designated Nature Conservation Sites'.
- 8.12 This guidance contains detailed and relevant advice in relation to the assessment of traffic generated air quality impacts and highlights the 1% threshold as a widely used threshold, below which fluctuations are not likely to be discernible from background fluctuations/measurements, and above which a need for further assessment is identified but does not automatically imply damage will occur.

### ***The Wealden Judgment***

- 8.13 Use of the DMRB and AQTAG21 for the purposes of assessing air quality within a plan level HRA was scrutinised through a High Court Judgment<sup>31</sup> whereby Wealden District Council challenged the HRA conclusions of the Joint Core Strategy (JCS) for Lewes District and South Downs National Park. Whilst the HRA had made conclusions of no likely significant effect on the basis of growth within the JCS alone, the High Court found that the HRA had failed to consider the combined effect of growth within multiple Local Plans in the vicinity of Ashdown Forest, thus necessitating an appropriate assessment. Natural England's advice given at the time deemed both the DMRB 1000AADT and the 1% of the critical load to be thresholds below which further assessment was not required. The Judgment relies on the caveat set out within AQTAG21, which advises that if there was to be a concentration of plans or projects in the same area, at the same time, then there

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<sup>31</sup> <sup>31</sup> *Wealden v SSCLG (2017)*

may be cause for case specific assessment and the 1% threshold may not automatically apply.

- 8.14 In light of this case it is important therefore for any HRA to refer to a range of evidence and advice when considering air quality impacts and the DMRB thresholds, the AQTAG21 advice and the findings of the High Court in the Wealden case should be considered together, alongside any other relevant research and evidence.

***European Court - Joined Cases C-293/17 and C-294/17***

- 8.15 Coöperatie Mobilisation (Joined Cases C-293/17 and C-294/17) are now being generally referred to as “the Dutch Case” for nitrogen deposition. This Netherlands co-joined case brought before the European Court is an important recent case in the interpretation of the European Directives for plans and projects with potential air pollution impacts. The case focusses on agricultural derived nitrogen deposition, and essentially questions whether it is appropriate to rely on strategic measures to alleviate air pollution that may create capacity for individual projects to be approved despite their individual contribution of additional pollutants.
- 8.16 The European Court Judgment focusses on the fact that where a European site is already deteriorating, projects that then worsen the situation should not be approved, unless there are clear and definitive measures underway to restore the situation and maintain favourable conservation status. The Netherlands Government has an approach that relies upon a programme of nitrogen reduction measures. What is key to the assessment of traffic increases relating to Local Plans, and indeed the assessment of any other potential impacts at the plan level, is that the European Court was clear that measures should not be relied upon if they are uncertain, have not yet been carried out, are not certain to take place, or have poor scientific basis.
- 8.17 The case therefore highlights the need to have certainty in any measures being relied upon to allow a conclusion of no adverse effects where they are expected but not yet completed. Importantly, any such measures need to be scientifically certain and secured (in terms of responsibility, finances, practical delivery etc.), rather than just forecasts.

***Natural England Guidance***

- 8.18 With growing interest from competent authorities in the correct approach to assessing air quality impacts following recent court cases, Natural England has been assisting local planning authorities across the country with advice on what

should be considered within an HRA. Natural England has a number of research reports available within its publications webpage.

- 8.19 Caporn et al (2016) highlights that the majority of designated sites in the UK are currently exceeding their critical loads for N deposition, and this is leading to significant changes in these sensitive habitats as a consequence. There are particular concerns in relation to lower plants, which are highly sensitive to N deposition.
- 8.20 Although habitat responses to N deposition are not fully understood, it is apparent that the relationship between increased pollutants and habitat deterioration (declines in species richness and species composition) is not linear. Critical loads identify a point at which significant vegetation change is likely to occur, but changes do not continue on a linear basis beyond the critical threshold.
- 8.21 Natural England's (2018) guidance on their approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations makes it clear that it is for the competent authority, not Natural England, to acquire enough evidence to support its HRA conclusions. Helpfully, the document highlights that the 1% threshold can be used to establish whether further assessment is necessary, but should not be used to determine whether an adverse effect can or cannot be ruled out.
- 8.22 Importantly, this document indicates that traffic management measures and habitat management measures or interventions that limit the dispersal of traffic emissions might constitute mitigation measures. It is concluded that whilst these measures alone do not enable a conclusion of no adverse effect as the extent of their effectiveness is not yet quantified, they can be considered as additional measures that positively support such a conclusion.

### ***CIEEM guidance***

- 8.23 In early 2021 CIEEM published guidance on the ecological assessment of air quality impacts (CIEEM, 2021). The guidance was produced in recognition that the ecological interpretation of air quality modelling is a rapidly shifting and developing field with many important principles still being debated in the legal, air quality science and ecological communities. Given the challenges for the assessment of air quality impacts following Wealden and the Dutch Nitrogen case, the CIEEM guidance recognises that when air quality issues in relation to ecology cannot be dismissed purely on modelled outputs, ecological decisions need to be taken on a case-by-case basis using sound evidence. This advice provides a consistent approach to understanding such effects, without prescribing the conclusion that should be drawn in any given situation.

### **JNCC Guidance**

8.24 JNCC released guidance in late 2021 on decision-making thresholds for air pollution (Chapman and Kite, 2021). This report is mainly focussed on individual sources of pollution and project rather than plan-level assessment. However, one key point from the guidance is that, unless local circumstances support a wider zone, plan HRA should take account of the potential effects of traffic emissions on European sites located within 10km of the plan boundary.

### **Roads and European sites around King's Lynn and West Norfolk**

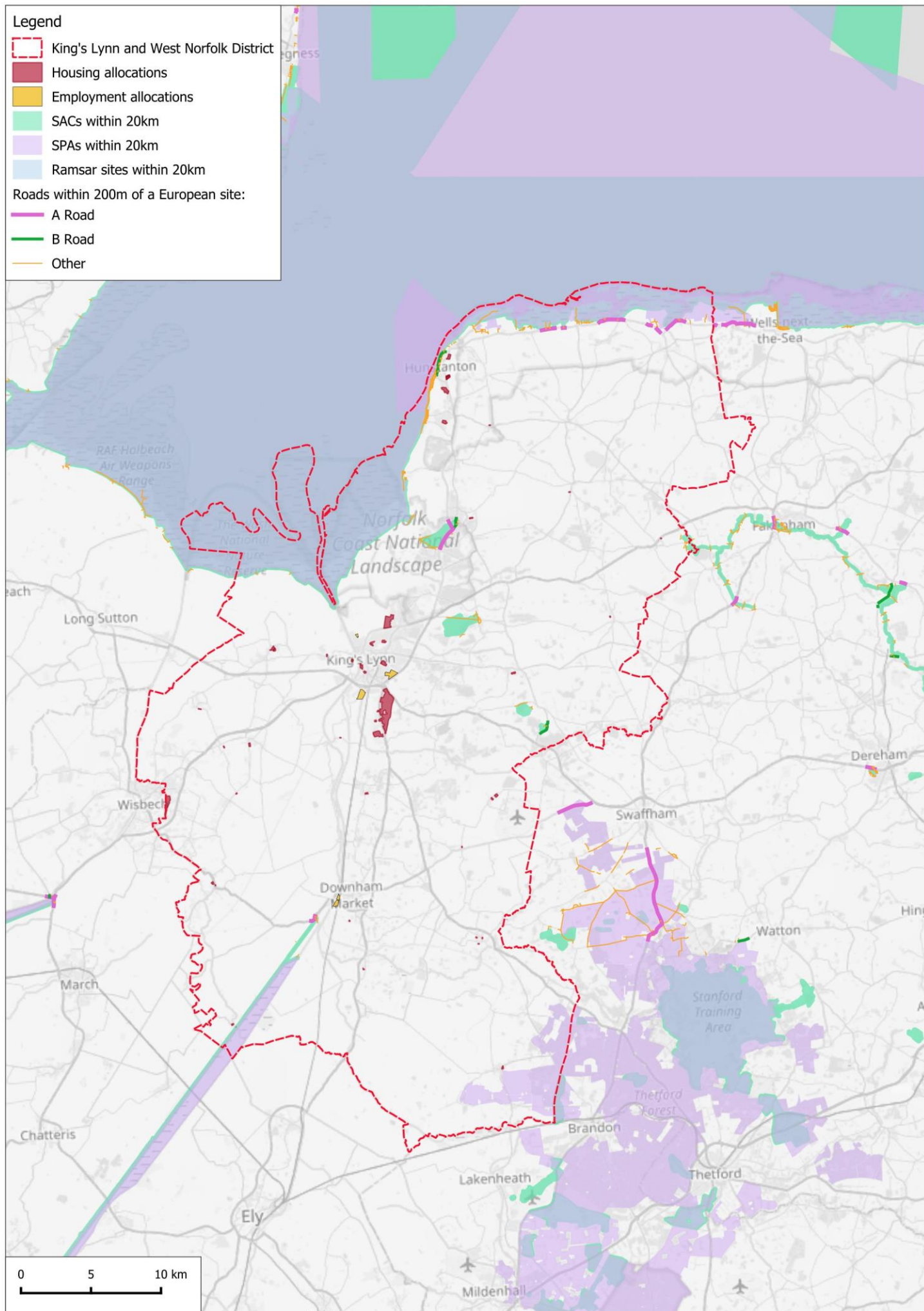
8.25 In Map 6 we show European sites and any roads that are within 200m of European sites. Roads within 200m of European sites are coloured to indicate the road class, with A roads shown as thick purple lines, B roads in green and unclassified roads in orange.

8.26 From this map, the relevant roads and European sites are:

- A149, along the north Norfolk coast, between Thornham and Wells-next-the-sea (North Norfolk Coast SAC, The Wash and North Norfolk Coast SAC, North Norfolk Coast SPA, North Norfolk Coast Ramsar);
- A149 across Dersingham Bog (Roydon Common & Dersingham Bog SAC, Dersingham Bog Ramsar);
- A1065 south of Swaffham (Breckland SAC, Breckland SPA);
- A1101 near Welney and A1122 near Downham Market (Ouse Washes SAC, Ouse Washes SPA, Ouse Washes Ramsar).

8.27 These are considered in turn below.

**Map 6: Roads within 200m of European sites close to King's Lynn and West Norfolk**



## **A149 (North Norfolk Coast SAC, The Wash and North Norfolk Coast SAC, North Norfolk Coast SPA, North Norfolk Coast Ramsar)**

- 8.28 The A149 coast road runs within 200m of the coastal European sites at a number of locations to the north of the District and just outside, including near Titchwell, Brancaster and near Holkham. The relevant road sections and 200m buffer are shown in Map 7.
- 8.29 The coast road is generally set back from the European site boundaries and it is only at Holkham, near the start of Lady Anne's Drive that part of the North Norfolk Coast SPA is directly adjacent to the road (with the SACs here further back and not within 200m). For all the other sections there are arable fields, hedges, trees and in parts housing that separate the road from the European site. Given that air pollution levels fall very sharply in the first tens of metres adjacent to a road, this means that risks are much reduced compared to where sensitive habitats are present directly alongside the road.
- 8.30 Reviewing the aerial imagery (see Map 7), the number of SAC qualifying habitats present within 200m is limited. With respect to the Wash and North Norfolk Coast SAC there are particularly limited areas, where the 200m just clips the upper parts of some creeks, and therefore includes saltmarsh and intertidal habitats. For the North Norfolk Coast SAC, in those locations where the 200m buffer clips the SAC this is in most cases over 100m from the road (at its closest, at Burnham Overy Staithe it comes around 60m). Where the North Norfolk Coast SAC lies within 200m of the road, the habitats present are limited to small areas of saltmarsh and wet woodland and the only qualifying features present within 200m are: H1420 Mediterranean and thermo-Atlantic halophilous scrubs (*Sarcocornetea fruticosi*). Critical loads/levels and current concentrations/depositions for the SAC interest are summarised in Table 9.
- 8.31 For the North Norfolk Coast SPA, the qualifying features likely to be present within 200m of the road are limited. The main species of relevance will be geese, Dark-bellied Brent Geese and perhaps Pink-footed Goose. Critical loads/levels and current concentrations/depositions for the SPA interest are summarised in Table 9.
- 8.32 For none of the relevant SAC or SPA qualifying features is the current baseline exceeding the critical levels/load and the values are typically well below the level at which impacts are to be expected. We have cited the average values on APIS to describe the current baseline and checks of the maximum values and gridded data suggest that there is relatively little variation (i.e. no indication that the average

values might not reflect the situation at very specific points and be therefore down-playing the risk).

- 8.33 Furthermore, the likely increases in traffic as a result of the plan along this stretch of road will be very small. There are allocations at Hunstanton but otherwise growth in the northern coastal part of the Borough will be limited. Traffic modelling (Norfolk County Council, 2021) undertaken for King's Lynn and West Norfolk Council demonstrates that traffic flows from growth in Hunstanton will predominantly be to the south and – as a result of the main allocations in Hunstanton and King's Lynn – additional traffic levels along the A149 along the north coast will be under 500 AADT.
- 8.34 Given the low levels of traffic flow predicted, the distribution of interest features in relation to the road and the distance of the road to the European site boundaries, adverse effects from the plan alone can be ruled out for air quality and the North Norfolk Coast SAC, The Wash and North Norfolk Coast SAC, the North Norfolk Coast SPA and North Norfolk Coast Ramsar. In-combination, traffic flows along the A149 will predominantly relate to tourist use and local residents. The coast road is slow and housing growth in North Norfolk (to the east) will be set back from the coast due to the range of landscape and environmental constraints. Traffic movements east-west will predominantly be on the A148, well to the south of the coast that links Fakenham to King's Lynn. Further assessment considering in-combination effects with other plans and projects would not change the outcome of the assessment and adverse effects on integrity from air quality can therefore be ruled out alone or in-combination.

# Map 7: A149 along the North Norfolk Coast



- |                                                   |                                                                                                                                    |
|---------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|
| Roads within 200m European site :                 | European sites:                                                                                                                    |
| <span style="color: magenta;">—</span> A Road     | <span style="background-color: #90EE90; border: 1px solid black; display: inline-block; width: 15px; height: 10px;"></span> SAC    |
| <span style="color: green;">—</span> B Road       | <span style="background-color: #ADD8E6; border: 1px solid black; display: inline-block; width: 15px; height: 10px;"></span> Ramsar |
| <span style="color: orange;">—</span> Other/minor | <span style="border-bottom: 1px dashed black; width: 15px; display: inline-block;"></span> SPA                                     |



Table 9: Air quality information from APIS for relevant qualifying features. Cells give site concentrations or depositions for relevant nutrient and interest feature (average values for site) and where critical loads are available these are given in the same cell underneath. Critical loads are minimum values. Orange shading indicates where current levels above critical load. Data from APIS<sup>32</sup>

Site & feature	. Nitrogen Deposition kg N/ha/yr	Acid Deposition Nitrogen   Sulphur keq/ha/yr	Ammonia Conc. µg/m <sup>3</sup>	NO <sub>x</sub> Conc. µg/m <sup>3</sup>	SO <sub>2</sub> C Conc. µg/m <sup>3</sup>
<b>The Wash and North Norfolk Coast SAC only</b>					
Salicornia and other annuals colonizing mud and sand (H1310)	12.3 20	0   0 Not sensitive	0.82 -	0 30	0 10
Atlantic salt meadows ( <i>Glauco-Puccinellietalia maritimae</i> ) (H1330)	12.3 20	0   0 Not sensitive	0.82 -	0 30	0 10
Mudflats and sandflats not covered by seawater at low tide (H1140)	- -	Not sensitive	0.82 -	0 30	0 10
<b>The North Norfolk Coast SAC and The Wash and North Norfolk Coast SAC</b>					
Lutra lutra - Otter (S1355)	12.3	0.9   0.2 Not sensitive	0.79 3	10.9 30	0.93
Mediterranean and thermo-Atlantic halophilous scrubs ( <i>Sarcocornetea fruticosi</i> ) (H1420)	12.3 20	0.9   0.2 Not sensitive	0.79	10.9 30	0.93 10
<b>North Norfolk Coast SPA</b>					
Dark-bellied Brent Goose	6.8 20	0.5   0.2 Not sensitive	1.0 3	0 Not sensitive	0
Pink-footed Goose	6.8 20	0.5   0.2 Not sensitive	1.0 3	0 Not sensitive	0

## A149 and Roydon Common & Dersingham Bog SAC, Dersingham Bog Ramsar

8.35 The A149 between King's Lynn and Hunstanton runs through Dersingham Bog (Roydon Common & Dersingham Bog SAC, Dersingham Bog Ramsar), running broadly north to south through the site (Map 8). Around 1730m of the road runs through the SAC/Ramsar and around 42.4ha of the SAC lies within 200m of the road. Around half of this area appears from aerial imagery to be woodland (around 21.5ha – as traced from aerial imagery). There are trees and scrub along the entire road section, but in some places these are quite thin.

<sup>32</sup> <http://www.apis.ac.uk/> accessed 30<sup>th</sup> March 2021

- 8.36 For the absence of doubt, the Roydon Common component of the SAC is beyond 200m from the A149 and the only roads within 200m are very minor roads which are not relevant to the assessment.
- 8.37 From a review of aerial images of Dersingham Bog, the majority of the area within 200m of the A149 is apparently dry heath, with the exception being the northern part of the road section after the roundabout, where it passes adjacent to wetland habitats. Relevant SAC features therefore that are within 200m potentially include:
- European dry heaths (H4030) on the wooded edges and open habitats nearest the road;
  - Northern Atlantic wet heaths with *Erica tetralix*; Wet heathland with cross-leaved heath (H4010) as the slope grades towards the main wetland area; and
  - Depressions on peat substrates of the Rhynchosporion (H7150).
- 8.38 The SSSI condition assessment details<sup>33</sup> and map of the SSSI units at Dersingham Bog SSSI confirm that the majority of the area within 200m of the A149 is within unit 3 which is comprised of dry heath and woodland. Unit 1 is the main area of valley mire and this extends along the northern edge of the site, while unit 2 also contains mire habitats and is the eastern part of the site. The A149 does provide the boundary for units 1 and 2 and around 230m of the road are within 200m of open habitats within these units. In total, estimating from aerial photographs, around 6.34ha of wet heath and mire habitats (within units 1 and 2) are present within 200m of the A149.
- 8.39 Baseline air quality data for Dersingham Bog and Roydon Common SAC are summarised in Table 10. The supplementary conservation advice sets a restore target for air quality and the depressions on peat substrates interest feature. The advice states that the lower critical loads for nitrogen, ammonia and acid deposition are currently being exceeded for this feature of the SAC. Data from APIS indicates that there is exceedance of the critical load for Nitrogen and Ammonia for all three habitats.

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<sup>33</sup> See [Natural England website](#), accessed 31<sup>st</sup> March 2021

**Table 10: Air quality information from APIS for relevant qualifying features. Cells give site concentrations or depositions for relevant nutrient and interest feature (average values for site) and where critical loads are available these are given in the same cell underneath. Critical loads are minimum values. Orange shading indicates where current levels above critical load. Data from APIS<sup>34</sup>.**

Site & feature	. Nitrogen Deposition kg N/ha/yr	Acid Deposition Nitrogen   Sulphur keq/ha/yr	Ammonia Conc. µg/m <sup>3</sup>	NO <sub>x</sub> Conc. µg/m <sup>3</sup>	SO <sub>2</sub> C Conc. µg/m <sup>3</sup>
<b>Roydon Common &amp; Dersingham Bog SAC</b>					
Depressions on peat substrates of the Rhynchosporion	15.7 10	1.1 0.2	1.35 1	0 30	0 10
Northern Atlantic wet heaths with Erica tetralix - Wet heathland with cross-leaved heath	15.7 10	1.1 0.2	1.35 1	0 30	0 10
Dry heaths	15.7 10	1.1 0.2	1.35 1	0 30	0 10

8.40 APIS provides source attribution data for nitrogen deposition, sulphur deposition and acid deposition. The information shows the relative contribution that each source sector makes to current pollution levels. These data show that around 9% of the Nitrogen deposition is attributable to road transport (with the main sources being Europe import and Livestock). Road transport makes a negligible contribution to sulphur deposition and around 7% of acid deposition at the SAC is attributed to roads.

### **Modelling**

8.41 Transport modelling (Norfolk County Council, 2021) shows that it is development in Hunstanton that has the most marked effect on traffic flows along the A149 at Dersingham Bog. The modelling suggests that sites F2.2 and F2.3 (around 350 dwellings) will result in an increase in traffic of 500 AADT on the A149 through Dersingham Bog. Around 45% of vehicle movements from Hunstanton are likely to use the road. By contrast, just 10% of trips from King's Lynn are predicted to involve the A149 at Dersingham Bog (with the report suggesting this is likely to be an overestimate). In total, as a result of growth to the north of King's Lynn (allocation E3.1) and the Hunstanton sites (F2.2 and F2.3), the increase through Dersingham Bog is predicted to be 647 AADT.

8.42 Further modelling was undertaken in 2022 (Patel, 2022), this used traffic data provided by the local authority for 2022 and derived predictions in traffic for 2025

<sup>34</sup> <http://www.apis.ac.uk/> accessed 30<sup>th</sup> March 2021

and 2030 using a local growth factor. Air quality modelling using a dispersion model determined the impact of road traffic emissions. The assessment determined that emissions from the A149 resulted in the critical load for Nitrogen Deposition and Acid Deposition being exceeded.

***Dersingham Bog mitigation***

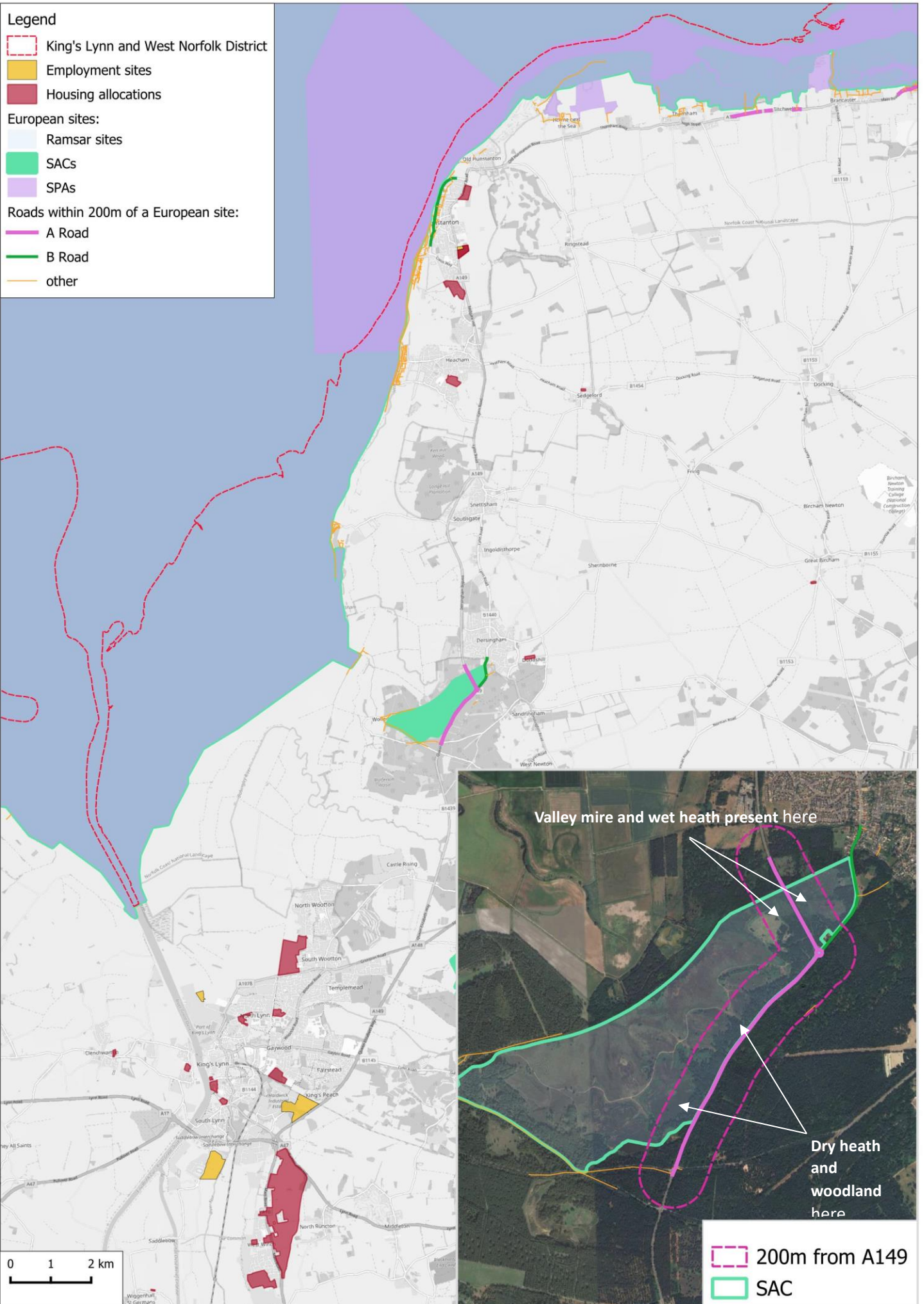
- 8.43 Key concerns relate to the A149 which runs through Dersingham Bog and. Around 6.3ha of wet heathland/mire habitats are present within 200m of the road, based on aerial photographs and the critical load for Nitrogen (and also acidity and Ammonia) are currently exceeded. Traffic accounts for a relatively small contribution (around 9%) of the Nitrogen deposition on the site.
- 8.44 Given the relatively small contribution that traffic makes to the Nitrogen deposition at Dersingham Bog and the levels of traffic predicted below 1000AADT, risks are potentially low. However, given that the traffic forecasts do not take into account all growth and it is difficult to predict long-term trends in traffic, some uncertainty remains.
- 8.45 In order to address this uncertainty, Policy LP27 (Main Modification MM086) sets out the requirement for development to be consistent with an air quality mitigation strategy produced by the Council and that it must demonstrate that any effect on air quality will not adversely affect the integrity of Roydon Common and Dersingham Bog SAC or Dersingham Bog Ramsar.
- 8.46 This strategy will need to establish detailed vegetation monitoring, air quality monitoring and traffic forecasting which will clarify the extent to which critical loads or levels are exceeded at different distances from the road, how that will change overtime, with and without future housing growth. If necessary, the strategy will establish necessary avoidance or mitigation measures which could include:
- Phasing of development (recognising that air quality will improve over time, for example with the adoption of more electric vehicles);
  - Implementation of speed restrictions on the relevant section of road;
  - Requirement for development to be designed such that traffic flows on the A149 through Dersingham Bog will be within acceptable levels;
  - Encouraging the use of zero emission vehicles.
  - There may also be options for habitat management within the SAC to reduce the impact at the location at which the impacts are predicted to occur, for example through vegetation management or bare ground creation alongside the road.

- 8.47 A precedent exists in Dorset where an interim air quality strategy<sup>35</sup> has been agreed with Natural England to address sources of airborne nitrogen-based pollution generated in the vicinity of the Dorset Heathlands. The Dorset Heaths example is much more complex in that multiple sections of road cross heathlands across a wide area and housing growth is also across a wide area encompassing two local authorities. The habitats are however similar. For Dersingham Bog, the issues relate to a single, relatively short section of road and therefore mitigation can be targeted.
- 8.48 While the strategy has not been produced to accompany the Plan and this HRA, further modelling work (Patel, 2022) has been undertaken by the Council since the pre-submission HRA (May 2021). The wording in Policy LP27 is clear that development will be dependent upon the strategy and will not come forward if adverse effects cannot be ruled out. Given the current evidence of the exceedance of critical loads, development will therefore need to demonstrate no increase in traffic on the relevant road section. With the protective wording in place, adverse effects on integrity as a result of the in-combination effects of air quality on Roydon Common & Dersingham Bog SAC/Dersingham Bog Ramsar can be ruled out.
- 8.49 Examples of case law highlight the need for clarity that mitigation can be delivered and is achievable, rather than all details being finalised. In the case of *NANT v Suffolk Coastal District Council* (2015), the Court of Appeal ruled that 'the important question... is not whether mitigation measures were considered at the stage of Core Strategy in as much detail as the available information permitted, but whether there was sufficient information at that stage to enable the Council to be duly satisfied that the proposed mitigation measures could be achieved in practice'. As such it is the competent authority needs to be satisfied that mitigation measures to avoid adverse effects upon the integrity of the European site can be achieved in practice. Given that the risks relate to a single discrete and short section of road, plus the approach established in Dorset demonstrates a precedent, such a conclusion is justified.

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<sup>35</sup> Available on the [Bournemouth, Christchurch and Poole Council website](#)

# Map 8: Dersingham Bog and A149



## **A1065 and Breckland SPA**

- 8.51 Map 6 shows the road network, allocations and Breckland SPA and SAC. It can be seen that the A1065 south of Swaffham runs through the SPA and is the key location where air quality could pose a risk. The map shows that there are no main road sections that run within 200m of Breckland SAC apart from well to the south (for example the A11 south-west of Thetford) and given the orientation of these and distance from the Borough, there are no credible risks to the SAC. Risks therefore solely relate to Breckland SPA.
- 8.52 The supplementary conservation advice for the SPA sets targets to restore all three qualifying species: Stone Curlew, Nightjar and Woodlark. This is because grass heath vegetation in Breckland is dependent on low nutrient conditions and is thus vulnerable to aerial nitrogen deposition. The region is stated as having one of the highest levels of deposition in Britain and the risks relate to the increased nutrients promoting vigorous vegetation growth, with the loss of short swards and early successional habitats. These are particularly important for Stone Curlew and Woodlark.
- 8.53 The relevant section of road predominantly passes through farmland (with some small shelter belts and areas of conifer woodland). The farmland is intensively managed, with pig units and arable and no areas of grass heath lie within 200m of the road. These areas of agricultural land have been classified for Stone Curlew which can nest in arable, particularly where plots of bare ground have been created for them. The areas are subject to intensive management and the impacts of road traffic on Nitrogen for these areas will be inconsequential. Traffic modelling highlights low levels of traffic along the roads in the Breckland area as a result of growth in the Borough. As a result, adverse effects on integrity for Breckland SPA can be ruled out, alone or in-combination.

## **A1101/A1122 and the Ouse Washes SAC/SPA/Ramsar**

- 8.54 A section of the A1122 runs for about 530m within 200m of the Ouse Washes SAC towards the north-eastern end of the site, close to Downham Market. In addition, the A1101 runs perpendicular to the Ouse Washes and crosses near Welney. A total of around 64m cross the SAC while around 1205m runs through the SPA. The parts of the SPA within 200m of the road are wet grassland bisected by field drains.
- 8.55 Air quality is not identified as a current threat or issue for the site in Natural England's site improvement plan. For the SAC, the qualifying feature is Spined

Loach, a small, bottom-dwelling freshwater fish. For the SPA the qualifying features are a range of wintering waterbirds, wintering hen harrier and breeding waterbirds. For the Spined Loach and all the SPA features the respective supplementary conservation advice sets a target to maintain or restore as necessary concentrations and deposition of air pollutants at or below the site-relevant Critical Load or Level values. The SPA advice notes that air quality is currently within acceptable limits for the notified features and their habitats.

- 8.56 Data from APIS are summarised in Table 11. APIS provides targets and critical levels/loads for multiple different habitats for the site, depending on the species. These include arable and also saltmarsh habitats for some species. It can be seen that levels are within acceptable limits, where the levels are set. The only exception is Hen Harrier, where APIS gives a critical load of 15-30 kg N/ha/yr for the species, for Fen, Marsh and Swamp vegetation (the most relevant habitat to that alongside the road) and the current average deposition is 18.1 kg N/ha/yr. However, APIS states that there are no expected negative impacts on the species due to impacts on the species' broad habitat.
- 8.57 In general, for the birds the impacts of air quality will relate to the structure of the habitat, and for example as the wintering wildfowl feed on vegetation, Nitrogen deposition may result in increased vegetative growth and be positive. Species such as the Swans and Hen Harrier are wide ranging and will use surrounding farmland which is not sensitive to air quality impacts. Furthermore, many species are likely to avoid the areas adjacent to the road due to disturbance (e.g. Holm and Laursen, 2009; McClure *et al.*, 2013), and therefore the distribution is already such that the areas close to the road are of less importance.
- 8.58 The European site is surrounded by intensive agriculture and fertilizer will have a marked influence on the levels of pollutants; APIS attributes only around 12% of Nitrogen deposition to road transport. This is likely to be especially relevant for the aquatic interest (e.g. Spined Loach), where run off will be key in relation to water quality and enrichment. Eutrophic systems such as the Ouse Washes are likely to be Phosphorous limited rather than Nitrogen, which will mean that the impacts of Nitrogen deposition are less relevant.
- 8.59 Traffic modelling (Norfolk County Council, 2021) suggests that traffic flows in the vicinity of the Ouse Washes SAC/SPA will be around 282 AADT as a result of growth at selected strategic housing sites near King's Lynn and Hunstanton. These predictions do not include growth in Downham Market or Wisbech, nor is it clear which specific road the prediction relates to. It would seem likely that traffic



increases will be slight, particularly as the roads identified are relatively minor and simply serve local towns (Wisbech and Downham Market).

- 8.60 While there is some uncertainty around the traffic predictions, adverse effects on integrity can be ruled out for the Ouse Washes SAC/SPA/Ramsar, due to the habitats affected, the implications for air quality on the qualifying features, their distribution within the site and local nature of the roads. Further assessment considering in-combination effects with other plans and projects would not change the outcome of the assessment given the minor, local nature of the roads here and adverse effects on integrity from air quality can therefore be ruled out alone or in-combination for the Ouse Washes SAC/SPA/Ramsar.

**Table 11: Air quality information from APIS<sup>36</sup> for relevant qualifying features for the Ouse Washes SAC (Spined Loach) and SPA (birds). Cells give site concentrations or depositions for relevant nutrient and interest feature (average values for site) and where critical loads are available these are given in the same cell underneath. Critical loads are minimum values. Orange shading indicates where current levels above critical load. Acidity information not given due to the complexities of the different habitats and volume of information. In all cases where critical loads are set they are not currently being exceeded.**

Site & feature	. Nitrogen Deposition kg N/ha/yr	Ammonia Conc. µg/m <sup>3</sup>	NO <sub>x</sub> Conc. µg/m <sup>3</sup>	SO <sub>2</sub> C Conc. µg/m <sup>3</sup>	Notes
Spined Loach	4.2 -	2.14 3	0 30	0 -	
Bewick's Swan (Non-breeding)	18.1 -	2.12 3		0 -	Birds roost on the washes and predominantly feed on surrounding arable land. Arable and improved grassland habitats not sensitive to air quality impacts.
Whooper Swan (Non-breeding)	18.1 -	2.12			As for Bewick's Swan
Eurasian Wigeon (Non-breeding)	18.1 20	2.12 3	0 30	0 -	N critical load relates to saltmarsh
Gadwall (Breeding)	18.1 20	2.12 3	0 30	0 -	
Eurasian Teal (Non-breeding)	18.1 20	2.12 3	0 30	0 -	N critical load relates to saltmarsh
Mallard (Breeding)	18.1 -	2.12 3	0 30	0 -	
Northern pintail (Non-breeding)	18.1 20	2.12 3	0 30	0 -	N critical load relates to saltmarsh
Garganey (Breeding)	18.1 20	2.12 3	0 30	0 -	

<sup>36</sup> <http://www.apis.ac.uk/> accessed 30<sup>th</sup> March 2021

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Site & feature	. Nitrogen Deposition kg N/ha/yr	Ammonia Conc. µg/m <sup>3</sup>	NO <sub>x</sub> Conc. µg/m <sup>3</sup>	SO <sub>2</sub> C Conc. µg/m <sup>3</sup>	Notes
Northern Shoveler (Non-breeding/breeding)	18.1 20	2.12 3	0 30	0 -	N critical load relates to saltmarsh
Hen Harrier (Non-breeding)	18.1 15	2.12 3	0 30	0 -	Birds will forage widely and prey on voles and a range of other live prey. No expected negative impact on species due to impacts on the species' broad habitat. N target for fens used.
Ruff (Breeding)	18.1 20	2.12 3	0 30	0 -	

## Conclusions: Air Quality

- 8.61 The issues are complicated as there is a general trajectory of improving air quality and vehicle emissions are improving. There has been a marked shift in how people use cars in 2020 as a result of the pandemic, with a shift to home working and less commuting (but potentially also less use of public transport). Petrol and diesel engines are being phased out by the government and the Local Plan 2021 - 2040 contains a range of measures to reduce traffic and use of cars. These various elements should mean that air quality will improve over time.
- 8.62 Drawing on baseline data on air quality at relevant European sites in relation to critical levels/loads, traffic modelling and detailed consideration of the site specific issues in terms of qualifying features, their ecology and distribution within the site, adverse effects on integrity for the following sites can be ruled out, alone or in-combination:
- North Norfolk Coast SAC/SPA/Ramsar, The Wash and North Norfolk Coast SAC
  - Breckland SAC/SPA
  - Ouse Washes SAC/SPA/Ramsar.
- 8.63 At present, however, in the absence of any mitigation it is not possible to rule out adverse effects on the integrity for air quality impacts as a result of the cumulative effects of increased road traffic from allocations in the Plan at Dersingham Bog (Roydon Common & Dersingham Bog SAC, Dersingham Bog Ramsar). Modelling and recent work by the Council indicates current exceedance of critical loads on the key section of road. Further evidence gathering is required in order to identify any necessary mitigation and ensure this is in place. Policy LP27 refers to the preparation of an air quality strategy and the policy wording ensures development can only come forward when adverse effects on integrity can be ruled out.

## 9. Formal Integrity Test and Conclusions

- 9.1 The King's Lynn and West Norfolk Local Plan 2021 - 2040 at pre-submission has been subjected to an appropriate assessment and integrity test according to the statutory provisions laid out in the Habitats Regulations 2017 as amended. The outcomes allow the following conclusions to be drawn:

### Loss of supporting habitat/functionally-linked land

- 9.2 Wide ranging bird species are qualifying features of a number of European sites within or close to the Borough and a number of different bird species are known to use habitat outside the European sites.
- 9.3 We identify one where a need for project level HRA has been identified and this is highlighted in the Plan. Allocation E3.1 at South Wootton was subject to a project level HRA through the development management process to check for impacts from loss of supporting habitat and ensure adequate mitigation is in place.
- 9.4 With the protective wording in place, adverse effects can be ruled out alone and in-combination given the scale of development and the allocation sites, all of which have been checked using GIS, knowledge of the relevant areas and the ecology of the bird interest. There is no credible evidence of a real risk that the allocations together will have a meaningful effect of the qualifying features of the Breckland SPA (where risks relate to Nightjar), for the Ouse Washes SPA/Ramsar (where risks relate to Swans and raptors) and for the North Norfolk Coast SPA/Ramsar and the Wash SPA/Ramsar (where risks relate to geese and raptors). The risks are so small that further assessment considering in-combination effects with other plans and projects would not change the outcome of the assessment and adverse effects on integrity for all sites from loss of supporting habitat can therefore be ruled out alone or in-combination.

### General urban effects and avoidance of buildings by Stone Curlews

- 9.5 In terms of Breckland SPA and Stone Curlews, the avoidance of areas by birds due to the effect of buildings is addressed in Policy LP27 which limits growth within 1500m of the SPA unless particular criteria are met, such as the development is fully within an existing urban area. Only one allocations is within 1500m of the SPA; at Feltwell (G35.1), and this complies with the protective policy. A review of allocations outside the 1500m zone but within the potential area where development could impact on Stone Curlews that are using areas outside the SPA

boundary indicates no risks. The policy ensures cumulative impacts are addressed and ensures in-combination effects can be ruled out.

- 9.6 Checks for all relevant European sites for housing growth within 400m indicates very low levels of growth and all allocation sites have been checked. The scale of growth and locations involved mean that adverse effects on integrity from urban effects can be ruled out for all European sites, alone or in-combination. There is no need for mitigation. Given the absence of residual effects, there is no need for an in-combination assessment.

## Recreation Impacts

- 9.7 The component SSSIs for the Norfolk Valley Fens that fall within or in proximity to the Borough are largely inaccessible and do not support qualifying features sensitive to recreation impacts, as such adverse effects on integrity can be ruled out alone. There is no need for mitigation. Given the absence of residual effects, there is no need for an in-combination assessment.
- 9.8 For the other European sites, namely Breckland SPA/SAC; Roydon Common & Dersingham Bog SAC, Roydon Common Ramsar, Dersingham Bog SAC; The Ouse Washes SPA/SAC/Ramsar; The North Norfolk Coast SAC/SPA/Ramsar, the North Norfolk Coast & the Wash SAC, The Wash SPA/Ramsar it is not possible to rule out adverse effects on integrity in the absence of mitigation. Risks relate to the overall quantum of growth within the Plan and the potential in-combination effects.
- 9.9 It is therefore necessary for the Local Plan 2021 - 2040 to ensure there is sufficient mitigation and that – in accord with the relevant guidance (Tyldesley and Chapman, 2021) mitigation should be effective, reliable, timely, guaranteed to be delivered and as long-term they need to be to achieve their objectives. The county-wide mitigation strategy 'RAMs' provides the means to provide and secure the necessary mitigation.
- 9.10 The GIRAMS ensures cumulative impacts are addressed. Without the GIRAMS in place there is no means to address the effects from the overall quantum of growth within the Plan. Recent work by Footprint Ecology has resulted in a new action plan to accompany the GIRAMS and this ensures mitigation is up to date, appropriate and tailored to the level of growth predicted. With the GIRAMS in place and running smoothly, adverse effects on integrity can be ruled out, alone or in-combination.

## Water-related impacts

- 9.11 Various European sites have water-dependent qualifying features which could be affected by development. Adverse effects on integrity from water-related issues are ruled out alone or in-combination for the: Ouse Washes SAC/SPA/Ramsar, the Norfolk Valley Fens SAC, Breckland SAC, North Norfolk Coast SAC/SPA/Ramsar, The Wash & North Norfolk Coast SAC and the Wash SPA/Ramsar. Adverse effects on integrity for all these sites are eliminated due to the scale of growth, the locations in relation to the European sites and qualifying features and through protective measures established through the review of consent/licensing of abstraction and management of water quality as controlled by the statutory agencies.
- 9.12 Any development coming forward in the catchment of the River Wensum SAC must avoid any further pollution of the river. There are two small allocations (G31.1 and G42.1) that fall within the catchment of the Wensum and policy wording ensures these will only come forward if they can demonstrate nutrient neutrality. As such any risks to the River Wensum SAC are eliminated.
- 9.13 For Roydon Common and Dersingham Bog SAC protective wording has been included within the plan in relation to an allocation in close proximity: G29.1. The wording identifies the need for project level Habitats Regulation Assessment and provision of suitable mitigation where necessary. This ensures necessary hydrological checks are made and any issues relating to drainage or hydrology adequately resolved in the site design before development can be allowed to proceed.
- 9.14 The protective wording ensures development can only proceed if hydrological issues for Roydon Common and Dersingham Bog SAC are resolved. This allows a conclusion at plan level that adverse effects on integrity from water-related impacts can be ruled out for all European sites, alone or in-combination. There is no need for mitigation. Given the absence of residual effects, there is no need for an in-combination assessment.

## Air Quality

- 9.15 The issues are complicated as there is a general trajectory of improving air quality and vehicle emissions are improving. There has been a marked shift in how people use cars in 2020 as a result of the pandemic, with a shift to home working and less commuting (but potentially also less use of public transport). Petrol and diesel engines are being phased out by the government and the Local Plan 2021 - 2040 contains a range of measures to reduce traffic and use of cars. These various elements should mean that air quality will improve over time.

- 9.16 Likely significant effects were triggered for a number of sites where there are roads within 200m. Detailed assessment rules out adverse effects on integrity for North Norfolk Coast SAC/SPA/Ramsar, The Wash and North Norfolk Coast SAC, Breckland SAC/SPA and the Ouse Washes SAC/SPA. There is no need for mitigation. Given the absence of residual effects, there is no need for an in-combination assessment.
- 9.17 At present, however, it is not possible to rule out adverse effects on the integrity for air quality impacts as a result of the cumulative effects of increased road traffic from allocations in the Plan at Dersingham Bog (Roydon Common & Dersingham Bog SAC, Dersingham Bog Ramsar). Modelling and recent work by the Council indicates current exceedance of critical loads on the key section of road. Further evidence gathering is required in order to identify any necessary mitigation and ensure this is in place. A strategy is being produced by the Council. This strategy is referred to in Policy LP27 and policy wording ensures development can only come forward when adverse effects on integrity can be ruled out.



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## Appendix 1: European Site Conservation Objectives

As required by the Directives, 'Conservation Objectives' have been established by Natural England, which should define the required ecologically robust state for each European site interest feature. All sites should be meeting their conservation objectives. When being fully met, each site will be adequately contributing to the overall favourable conservation status of the species or habitat interest feature across its natural range. Where conservation objectives are not being met at a site level, and the interest feature is therefore not contributing to overall favourable conservation status of the species or habitat, plans should be in place for adequate restoration.

Conservation objectives inform any HRA of a plan or project, by identifying what the interest features for the site should be achieving, and what impacts may be significant for the site in terms of undermining the site's ability to meet its conservation objectives

In 2012, Natural England issued a set of generic European site Conservation Objectives, which should be applied to each interest feature of each European site. The list of generic Conservation Objectives for each European site includes an overarching objective, followed by a list of attributes that are essential for the achievement of the overarching objective. Whilst the generic objectives currently issued are standardised, they are to be applied to each interest feature of each European site, and the application and achievement of those objectives will therefore be site specific and dependent on the nature and characteristics of the site.

In addition to the generic objectives, there is more detailed, supplementary site-specific information to underpin these generic objectives. This provides much more site-specific information, and this detail plays a fundamental role in informing HRA, and gives greater clarity to what might constitute an adverse effect on a site interest feature. Links in Appendix 2 provide access to both generic conservation objectives and the supplementary advice for each European site.

For SPAs the overarching objective is to:

*'Avoid the deterioration of the habitats of qualifying features, and the significant disturbance of the qualifying features, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving the aims of the Birds Directive.'*

This is achieved by, subject to natural change, maintaining and restoring:

- The extent and distribution of the habitats of the qualifying features.
- The structure and function of the habitats of the qualifying features.
- The supporting processes on which the habitats of the qualifying features rely.
- The populations of the qualifying features.
- The distribution of the qualifying features within the site.

For SACs the overarching objective is to:

*'Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.'*

This is achieved by, subject to natural change, maintaining and restoring:

- The extent and distribution of the qualifying natural habitats and habitats of qualifying species.
- The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species.
- The supporting processes on which qualifying natural habitats and habitats of qualifying species rely.
- The populations of qualifying species.
- The distribution of qualifying species within the site.



## Appendix 2: Conservation Interest of European Sites

Links in the table cross-reference to the Natural England website and the relevant page with the site's conservation objectives. In the qualifying features column, for SPAs NB denotes non-breeding and B breeding features. For SACs, # denotes features for which the UK has a special responsibility. The descriptive text is adapted from Natural England's site improvement plan or citation. For Ramsar sites, the qualifying features and description are drawn from the Ramsar spreadsheet on the JNCC website<sup>37</sup>, and the link cross-references to the Ramsar site information page.

European site	Designated features	Description
<a href="#">Breckland SAC</a>	H2330 Inland dunes with open <i>Corynephorus</i> and <i>Agrostis</i> grasslands H3150 Natural eutrophic lakes with <i>Magnopotamion</i> or <i>Hydrocharition</i> H4030 European dry heaths H6210 Semi-natural dry grasslands and scrubland facies: on calcareous substrates ( <i>Festuco-Brometalia</i> ), (note that this includes the priority feature "important orchid rich sites") H91E0# Alluvial woods with <i>A. glutinosa</i> , <i>F. excelsior</i> S1166 Great crested newt, <i>Triturus cristatus</i>	Breckland in the heart of East Anglia is a gently undulating plateau underlain by bedrock of Cretaceous Chalk, covered by thin deposits of sand and flint. The conditions during the last glaciation have given rise to the patterned ground features and ice depressions (pingos) that we see today and that are of high geological and biological importance. The continental climate, with low rainfall and free-draining soils, has led to the development of dry heath and grassland communities. Relatively lush river valleys provide a gentle contrast to the drier harsher surroundings.
<a href="#">Breckland SPA</a>	Nightjar, <i>Caprimulgus europaeus</i> - A224, b Stone-curlew, <i>Burhinus oedicephalus</i> - A133, b Woodlark, <i>Lullula arborea</i> - A246, b	The Breckland of Norfolk and Suffolk lies in the heart of East Anglia on largely sandy soils of glacial origin. In the 19th century the area was termed a sandy waste, with small patches of arable cultivation that were soon abandoned. The continental climate, with low rainfall and free-draining soils, has led to the development of dry heath and grassland communities. Much of Breckland was planted with conifers through the 20th century, and elsewhere arable farming is the predominant land use. The remnants of dry heath and grassland that have survived these changes support heathland-breeding birds, where grazing by sheep and rabbits is sufficiently intensive to create short turf and open ground. These species have also adapted to live in forestry and arable habitats. Woodlark <i>Lullula arborea</i> and Nightjar <i>Caprimulgus europaeus</i> breed in recently felled areas and open heath

<sup>37</sup> <https://hub.jncc.gov.uk/assets/bc9b0905-fb63-4786-8e90-5f7851bb417d>

European site	Designated features	Description
		areas within the conifer plantations, while Stone Curlew <i>Burhinus oedicnemus</i> establishes nests on open ground provided by arable cultivation in the spring.
<a href="#">Chippenham Fen Ramsar</a>	Cambridge Milk Parsley, <i>Selinum carvifolia</i> Spring-fed calcareous basin mire Wetland invertebrate assemblage	The site is of international importance for its wide range of wetland habitats and associated flora, birds and insects. Areas of tall and often rich fen, fen grassland and basic flush have developed over shallow peat soils. The site also contains calcareous grassland, neutral grassland, woodland, mixed scrub and open water.
<a href="#">Dersingham Bog Ramsar</a>	Wetland invertebrate assemblage	Dersingham Bog is East Anglia's largest remaining example of a pure acid valley mire, and supports extensive bog, wet heath and transition communities over peat. These are sustained by groundwater, fed via springs and seepage, from the underlying greensand, which in places has caused the development of iron pans. The mire grades into dry heathland along the greensand scarp slope. The scarp slope is a former sea cliff, and the bog habitats are a remnant of the transition mires that formerly existed between this former shoreline and the now mostly land-claimed saltmarshes around The Wash. In addition to its internationally important plant communities, the site also supports important assemblages of birds and British Red Data Book invertebrates.
<a href="#">Fenland SAC</a>	H6410 Molinia meadows on calcareous, peat or clay-silt soil H7210# Calcareous fens with <i>C. mariscus</i> and species of <i>C. davalliana</i> S1149 Spined Loach, <i>Cobitis taenia</i> S1166 Great Crested Newt, <i>Triturus cristatus</i>	The individual sites within Fenland SAC each hold areas of calcareous fens, with a long and well-documented history of regular management. There is a full range from species-poor Great Fen-sedge <i>Cladium mariscus</i> -dominated fen to species-rich fen with a lower proportion of Great Fen-sedge and containing such species as Black Bog-rush <i>Schoenus nigricans</i> , Tormentil <i>Potentilla erecta</i> and Meadow Thistle <i>Cirsium dissectum</i> . There are good transitions to the tall herb-rich East Anglian type of Purple Moor-grass <i>Molinia caerulea</i> -Meadow Thistle fen-meadow and rush pastures, all set within a mosaic of reedbeds and wet pastures.
<a href="#">Gibraltar Point Ramsar</a>	Bar-tailed Godwit, <i>Limosa lapponica</i> - Wintering Coastal dunes Dark-bellied Brent Goose, <i>Branta bernicla</i> - Wintering Sanderling, <i>Calidris alba</i> - Wintering Waterbird assemblage - Wintering Wetland invertebrate assemblage	Gibraltar Point consists of an actively accreting sand dune system, saltmarsh and extensive intertidal flats. All stages of dune development are represented, with the older dunes extensively colonised by scrub. There are also small areas of freshwater marsh and open water. The site accommodates large numbers of overwintering birds.
<a href="#">Gibraltar Point SPA</a>	Bar-tailed Godwit, <i>Limosa lapponica</i> - A157, nb Grey Plover, <i>Pluvialis squatarola</i> - A141, nb Little Tern, <i>Sternula albifrons</i> - A195, b Sanderling, <i>Calidris alba</i> - A144, nb	Gibraltar Point is located on the Lincolnshire coast in eastern England. It lies north of The Wash and consists of an actively accreting sand-dune system, saltmarsh and extensive intertidal flats. All stages of dune development are represented with the older dunes extensively colonised by scrub. There are also small areas of freshwater marsh and open

European site	Designated features	Description
		<p>water. The site accommodates large numbers of overwintering birds and significant colonies of breeding terns. The terns feed outside the SPA in nearby waters. The site is also important for waders during the spring and autumn passage period. To the south, the coastal habitats of Gibraltar Point SPA are continuous with The Wash SPA, with which area the ecology of this site is intimately linked.</p>
<p><a href="#">Greater Wash SPA</a></p>	<p>Common Scoter, <i>Melanitta nigra</i> - A065, nb                      Common Tern, <i>Sterna hirundo</i> - A193, b                      Little Gull, <i>Hydrocoloeus (Larus) minutus</i> - A177, nb                      Little Tern, <i>Sternula albifrons</i> - A195, b                      Red-throated Diver, <i>Gavia stellata</i> - A001-A, nb                      Sandwich Tern, <i>Thalasseus sandvicensis</i> - A191, b</p>	<p>The Greater Wash SPA is located in the mid-southern North Sea between Bridlington Bay in the north and the Outer Thames Estuary SPA in the south. To the north, off the Holderness coast in Yorkshire, seabed habitats primarily comprise coarse sediments, with occasional areas of sand, mud and mixed sediments. Subtidal sandbanks occur at the mouth of the Humber Estuary, primarily comprising sand and coarse sediments. Offshore, soft sediments dominate, with extensive areas of subtidal sandbanks off The Wash as well as north and east Norfolk coasts. Closer inshore at The Wash and north Norfolk coast, sediments comprise a mosaic of sand, muddy sand, mixed sediments and coarse sediments, as well as occasional Annex I reefs. The area off the Suffolk coast continues the mosaic habitats mostly dominated by soft sediment.</p>
<p><a href="#">Inner Dowsing, Race Bank and North Ridge SAC</a></p>	<p>H1110 Sandbanks which are slightly covered by sea water all the time                      H1170 Reefs</p>	<p>Inner Dowsing Race Bank and North Ridge Special Area of Conservation is located off the south Lincolnshire coast, to the east of Skegness and extends eastwards and north from Burnham Flats on the North Norfolk coast. The site occurs in the approaches to The Wash, and crosses the 12 nautical mile boundary; therefore, lies partly in territorial and partly in offshore waters. The site contains sandbanks and <i>Sabellaria spinulosa</i> reefs which meet the Annex I habitat descriptions of "Sandbanks slightly covered by sea water all the time" and "Reefs" respectively. The sandbanks are important headland-associated offshore systems. Water depths are generally shallow and mostly less than 30m deep.</p>
<p><a href="#">Nene Washes Ramsar</a></p>	<p>Bewick's Swan, <i>Cygnus columbianus bewickii</i> - Wintering                      Wetland bird assemblage - Breeding                      Wetland invertebrate assemblage                      Wetland plant assemblage</p>	<p>This site is an extensive area of seasonally-flooding wet grassland (washland) of importance for national and international populations of breeding and wintering waders and wildfowl. During severe winter weather elsewhere, the site can attract waterfowl from other areas due to its relatively mild climate (compared with continental Europe) and abundant food resources available. The site is also notable for the diversity of plant and associated animal life within its network of dykes.</p>
<p><a href="#">Nene Washes SAC</a></p>	<p>S1149 Spined Loach, <i>Cobitis taenia</i></p>	<p>The Nene Washes is one of the country's few remaining areas of washland habitat. The site is notable for the diversity of plant and associated animal life within its network of dykes. Moreton's Leam, a large drainage channel running along the eastern flank of the washes, contains a high density of Spined Loach <i>Cobitis taenia</i>.</p>

European site	Designated features	Description
<a href="#">Nene Washes SPA</a>	Bewick's Swan, <i>Cygnus columbianus bewickii</i> - A037, nb Black-tailed Godwit, <i>Limosa limosa</i> - A614-A, b Gadwall, <i>Mareca strepera</i> - A051, b Gadwall, <i>Mareca strepera</i> - A051, nb Garganey, <i>Spatula querquedula</i> - A055, b Pintail, <i>Anas acuta</i> - A054, nb Shoveler, <i>Spatula clypeata</i> - A056, b Shoveler, <i>Spatula clypeata</i> - A056, nb Teal, <i>Anas crecca</i> - A704, nb Wigeon, <i>Mareca penelope</i> - A050, nb	The Nene Washes are located in eastern England on one of the major tributary rivers of The Wash. It is an extensive area of seasonally flooding wet grassland ('washland') lying along the River Nene. The cycle of winter storage of floodwaters from the river and traditional summer grazing by cattle have given rise to a mosaic of rough grassland and wet pasture, with a diverse ditch flora. Areas of arable cropping provide some winter feeding areas for wildfowl. In summer, it is of importance for breeding waders, as well as Spotted Crake <i>Porzana porzana</i> , whilst in winter the site holds large numbers of waders and wildfowl. During severe winter weather elsewhere the site can attract waterbirds from other areas due to its relatively mild climate (compared with continental Europe) and abundant food resources. Likewise, the site can act as a refuge for wildfowl displaced by deep flooding of the nearby Ouse Washes SPA. In winter, some wildfowl, especially Bewick's Swan <i>Cygnus columbianus bewickii</i> , feed in surrounding areas of agricultural land outside the SPA.
<a href="#">Norfolk Valley Fens SAC</a>	H4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> H4030 European dry heaths H6210 Semi-natural dry grasslands and scrubland facies: on calcareous substrates ( <i>Festuco-Brometalia</i> ), (note that this includes the priority feature "important orchid rich sites") H6410 <i>Molinia</i> meadows on calcareous, peat or clay-silt soil H7210# Calcareous fens with <i>C. mariscus</i> and species of <i>C. davallianae</i> H7230 Alkaline fens H91E0# Alluvial woods with <i>A. glutinosa</i> , <i>F. excelsior</i> S1014 Snail, <i>Vertigo angustior</i> S1016 Desmoulin's Whorl Snail, <i>Vertigo moulinsiana</i>	This site comprises a series of valley-head spring-fed fens. Such spring-fed flush fens are very rare in the lowlands. The spring-heads are dominated by the small sedge fen type, mainly referable to Black Bog-rush-Blunt-flowered Rush ( <i>Schoenus nigricans</i> - <i>Juncus subnodulosus</i> ) mire, but there are transitions to reedswamp and other fen and wet grassland types. The individual fens vary in their structure according to intensity of management and provide a wide range of variation. There is a rich flora associated with these fens, including species such as Grass-of-Parnassus <i>Parnassia palustris</i> , Common Butterwort <i>Pinguicula vulgaris</i> , Marsh Helleborine <i>Epipactis palustris</i> and Narrow-leaved Marsh-orchid <i>Dactylorhiza traunsteineri</i> .
<a href="#">North Norfolk Coast Ramsar</a>	Marsh and coastal habitats, Red-data book/RDB plants, invertebrates and a lichen Dark-bellied Brent Goose, <i>Branta bernicla</i> - Wintering Knot, <i>Calidris canutus</i> - Wintering Pink-footed Goose, <i>Anser brachyrhynchus</i> - Wintering Waterbird assemblage - Wintering	This low-lying barrier coast site extends for 40 km from Holme to Weybourne and encompasses a variety of habitats including intertidal sands and muds, saltmarshes, shingle and sand dunes, together with areas of land-claimed freshwater grazing marsh and reedbed, which is developed in front of rising land. Both freshwater and marine habitats support internationally important numbers of wildfowl in winter and several nationally rare breeding birds. The sandflats, sand dune, saltmarsh, shingle and saline

European site	Designated features	Description
	Wetland plant assemblage Wigeon, <i>Mareca penelope</i> - Wintering	lagoons habitats are of international importance for their fauna, flora and geomorphology.
<a href="#">North Norfolk Coast SAC</a>	H1150# Coastal lagoons H1220 Perennial vegetation of stony banks H1420 Mediterranean and thermo-Atlantic halophilous scrubs ( <i>Sarcocornetea fruticosi</i> ) H2110 Embryonic shifting dunes H2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ('White dunes') H2130# Fixed dunes with herbaceous vegetation ('Grey dunes') H2190 Humid dune slacks S1355 Otter, <i>Lutra lutra</i> S1395 Petalwort, <i>Petalophyllum ralfsii</i>	North Norfolk Coast contains a large, active series of dunes on shingle barrier islands and spits. The exceptional length and variety of the dune/beach interface is reflected in the high total area of embryonic dune. Sand Couch <i>Elytrigia junceais</i> the most prominent sand-binding grass. The site supports a large area of shifting dune vegetation, which is also varied but dominated by Marram <i>Ammophila arenaria</i> . The fixed dunes are rich in lichens and drought-avoiding winter annuals such as Common Whitlowgrass <i>Erophila verna</i> , Early Forget-me-not <i>Myosotis ramosissima</i> and Common Cornsalad <i>Valerianella locusta</i> . The main communities represented are Marram with Red Fescue <i>Festuca rubra</i> and Sand Sedge <i>Carex arenaria</i> , with lichens such as <i>Cetraria aculeata</i> . The dune slacks within this site are comparatively small and the Yorkshire-fog <i>Holcus lanatus</i> community predominates. They are calcareous and the communities occur in association with swamp communities. Some of the slacks support the liverwort Petalwort <i>Petalophyllum ralfsii</i> .
<a href="#">North Norfolk Coast SPA</a>	Avocet, <i>Recurvirostra avosetta</i> - A132-A, b Bittern, <i>Botaurus stellaris</i> - A021, b Common Tern, <i>Sterna hirundo</i> - A193, b Dark-bellied Brent Goose, <i>Branta bernicla bernicla</i> - A675, nb Knot, <i>Calidris canutus</i> - A143, nb Little Tern, <i>Sternula albifrons</i> - A195, b Marsh Harrier, <i>Circus aeruginosus</i> - A081, b Montagu's Harrier, <i>Circus pygargus</i> - A084, b Pink-footed Goose, <i>Anser brachyrhynchus</i> - A040, nb Sandwich Tern, <i>Thalasseus sandvicensis</i> - A191, b Waterbird assemblage Wigeon, <i>Mareca penelope</i> - A050, nb	The North Norfolk Coast SPA encompasses much of the northern coastline of Norfolk in eastern England. It is a low-lying barrier coast that extends for 40 km from Holme to Weybourne and includes a great variety of coastal habitats. The main habitats – found along the whole coastline – include extensive intertidal sand- and mud-flats, saltmarshes, shingle and sand dunes, together with areas of freshwater grazing marsh and reedbed, which has developed in front of rising land. The site contains some of the best examples of saltmarsh in Europe. There are extensive deposits of shingle at Blakeney Point, and major sand dunes at Scolt Head. Extensive reedbeds are found at Brancaster, Cley and Titchwell. Maritime pasture is present at Cley and extensive areas of grazing marsh are present all along the coast. The grazing marsh at Holkham has a network of clear water dykes holding a rich diversity of aquatic plant species. The great diversity of high-quality freshwater, intertidal and marine habitats results in very large numbers of waterbirds occurring throughout the year. In summer, the site holds large breeding populations of waders, four species of terns, Bittern <i>Botaurus stellaris</i> and wetland raptors such as Marsh Harrier <i>Circus aeruginosus</i> . In winter, the coast is used by very large numbers of geese, sea-ducks, other ducks and waders. The coast is also of major importance for staging waterbirds in the spring and autumn migration periods. Breeding terns, particularly Sandwich Tern <i>Thalasseus sandvicensis</i> , and wintering sea-ducks regularly feed outside the SPA in adjacent coastal waters.

European site	Designated features	Description
<a href="#">Ouse Washes Ramsar</a>	Bewick's Swan, <i>Cygnus columbianus bewickii</i> - Wintering Pintail, <i>Anas acuta</i> - Wintering Shoveler, <i>Spatula clypeata</i> - Wintering Teal, <i>Anas crecca</i> - Wintering Washland Waterbird assemblage - Wintering Wetland bird assemblage - Breeding Wetland invertebrate assemblage Wetland plant assemblage Whooper Swan, <i>Cygnus cygnus</i> - Wintering Wigeon, <i>Mareca penelope</i> - Wintering	This site is an area of seasonally-flooded washland habitat managed in a traditional agricultural manner. The washlands support nationally and internationally important numbers of wintering waterfowl and nationally important numbers of breeding waterfowl. The site is also of note for the large area of unimproved neutral grassland communities which it holds, and for the richness of the aquatic flora within the associated watercourses.
<a href="#">Ouse Washes SAC</a>	S1149 Spined Loach, <i>Cobitis taenia</i>	The Ouse Washes is one of the country's few remaining areas of extensive washland habitat. The associated dykes and rivers hold a great variety of aquatic plants; the pondweeds <i>Potamogeton</i> spp. are particularly well represented. The associated aquatic fauna is similarly diverse and includes Spined Loach <i>Cobitis taenia</i> . The Counter Drain, with its clear water and abundant aquatic plants, is particularly important, and a healthy population of Spined Loach is known to occur.
<a href="#">Ouse Washes SPA</a>	Bewick's Swan, <i>Cygnus columbianus bewickii</i> - A037, nb Black-tailed Godwit, <i>Limosa limosa limosa</i> - A614-A, b Breeding bird assemblage Gadwall, <i>Mareca strepera</i> - A051, b Garganey, <i>Spatula querquedula</i> - A055, b Hen Harrier, <i>Circus cyaneus</i> - A082, nb Mallard, <i>Anas platyrhynchos</i> - A705, b Pintail, <i>Anas acuta</i> - A054, nb Ruff, <i>Philomachus pugnax</i> - A151, b Shoveler, <i>Spatula clypeata</i> - A056, b Shoveler, <i>Spatula clypeata</i> - A056, nb Teal, <i>Anas crecca</i> - A704, nb Waterbird assemblage Whooper Swan, <i>Cygnus cygnus</i> - A038-B, nb Wigeon, <i>Mareca penelope</i> - A050, nb	The Ouse Washes are located in eastern England on one of the major tributary rivers of The Wash. It is an extensive area of seasonally flooding wet grassland ('washland') lying between the Old and New Bedford Rivers, and acts as a floodwater storage system during winter months. The cycle of winter storage of floodwaters from the river and traditional summer grazing by cattle, as well as hay production, have given rise to a mosaic of rough grassland and wet pasture, with a diverse and rich ditch fauna and flora. The washlands support both breeding and wintering waterbirds. In summer, there are important breeding numbers of several wader species, as well as Spotted Crake <i>Porzana porzana</i> . In winter, the site holds very large numbers of swans, ducks and waders. During severe winter weather elsewhere, the Ouse Washes can attract waterbirds from other areas due to its relatively mild climate (compared with continental Europe) and abundant food resources. In winter, some wildfowl, especially swans, feed on agricultural land surrounding the SPA.

European site	Designated features	Description
<a href="#">Rex Graham Reserve SAC</a>	H6210/H6211# Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (*important orchid sites)	Rex Graham Reserve is a disused chalk pit and surrounding land most of which is developing dry calcareous grassland characterised by False Oat-grass <i>Arrhenatherum elatius</i> . The site supports the largest population of Military Orchid <i>Orchis militaris</i> in the UK. The pit also contains a large number of bushes of Mezereon <i>Daphne mezereon</i> which is also rare as a wild plant. Other species found on the site include Twayblade <i>Listera ovata</i> , Adder's Tongue <i>Ophioglossum vulgatum</i> , Ploughman's Spikenard <i>Inula conyza</i> and Mullein <i>Verbascum thapsus</i> .
<a href="#">River Wensum SAC</a>	H3260 Water courses of plain to montane levels with <i>R. fluitantis</i> S1016 Desmoulin's Whorl Snail, <i>Vertigo moulinsiana</i> S1092 Freshwater Crayfish, <i>Austropotamobius pallipes</i> S1096 Brook Lamprey, <i>Lampetra planeri</i> S1163 Bullhead, <i>Cottus gobio</i>	The Wensum is a naturally enriched, calcareous lowland river. The upper reaches are fed by springs that rise from the chalk and by run-off from calcareous soils rich in plant nutrients. This gives rise to beds of submerged and emergent vegetation characteristic of a chalk stream. Lower down, the chalk is overlain with boulder clay and river gravels, resulting in aquatic plant communities more typical of a slow-flowing river on mixed substrate. Much of the adjacent land is managed for hay crops and by grazing, and the resulting mosaic of meadow and marsh habitats, provides niches for a wide variety of specialised plants and animals.
<a href="#">Roydon Common &amp; Dersingham Bog SAC</a>	H4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> H4030 European dry heaths H7150 Depressions on peat substrates of the <i>Rhynchosporion</i>	Roydon Common and Dersingham Bog represent the largest and best examples of Cross-leaved Heath – Bog-moss ( <i>Erica tetralix-Sphagnum compactum</i> ) wet heath in East Anglia. This vegetation community is part of a lowland mixed valley mire, a complex series of plant communities grading from wet acid heath through valley mire to calcareous fen. This gradation is of outstanding interest. The mire is extremely diverse and supports many rare plants, birds and insects, including the Black Darter dragonfly <i>Sympetrum scoticum</i> , a northern species with a very local distribution in south-east England. The site also contains an area of dry heathland, which is dominated by Heather <i>Calluna vulgaris</i> , Gorse <i>Ulex europaeus</i> and young Silver Birch <i>Betula pendula</i> , and has areas of Bracken around the margins.
<a href="#">Roydon Common Ramsar</a>	Mixed lowland valley mire Wetland invertebrate assemblage	Roydon Common is an area of lowland mixed valley mire surrounded by heathland. It sits on the Cretaceous greensand of west Norfolk, within a broad south-west-facing valley basin. It has a classic sequence of vegetation types associated with valley mires of this type. The dry heath of the upper slopes is hydrologically linked with wetter lower slopes, which experience seasonal waterlogging and are colonised by wet heath. This grades into the valley bottom, which is permanently waterlogged, and comprises acid bog and nutrient-poor fen communities, blending into more base-rich fen and carr woodland in the valley bottom.

European site	Designated features	Description
<a href="#">Saltfleetby-Theddlethorpe Dunes &amp; Gibraltar Point SAC</a>	H2110 Embryonic shifting dunes H2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ('White dunes') H2130# Fixed dunes with herbaceous vegetation ('Grey dunes') H2160 Dunes with <i>Hippophae rhamnoides</i> H2190 Humid dune slacks	The dune system on this composite site contains good examples of shifting dunes within a complex site that exhibits a range of dune types. The Marram <i>Ammophila arenaria</i> -dominated dunes are associated with Lyme-grass <i>Leymus arenarius</i> and Sand Sedge <i>Carex arenaria</i> . These shifting dunes are part of a successional transition with fixed dunes with dune grassland and Sea-buckthorn <i>Hippophae rhamnoides</i> . The rapidly-accreting dunes on the seaward sand bars and shingle banks make this an important site for research into the processes of coastal development.
<a href="#">The Wash &amp; North Norfolk Coast SAC</a>	H1110 Sandbanks which are slightly covered by sea water all the time H1140 Mudflats and sandflats not covered by seawater at low tide H1150# Coastal lagoons H1160 Large shallow inlets and bays H1170 Reefs H1310 Salicornia and other annuals colonising mud and sand H1330 Atlantic salt meadows ( <i>Glauco-Puccinellietalia maritima</i> ) H1420 Mediterranean and thermo-Atlantic halophilous scrubs ( <i>Sarcocornetea fruticosi</i> ) S1355 Otter, <i>Lutra lutra</i> S1365 Harbour (Common) Seal, <i>Phoca vitulina</i>	The Wash is the largest embayment in the UK. It is connected via sediment transfer systems to the north Norfolk coast. Together, the Wash and North Norfolk Coast form one of the most important marine areas in the UK and European North Sea coast, and include extensive areas of varying, but predominantly sandy, sediments subject to a range of conditions. Communities in the intertidal include those characterised by large numbers of polychaetes, bivalve and crustaceans. Subtidal communities cover a diverse range from the shallow to the deeper parts of the embayments and include dense brittlestar beds and areas of an abundant reef-building worm ('ross worm') <i>Sabellaria spinulosa</i> . The embayment supports a variety of mobile species, including a range of fish, Otter <i>Lutra lutra</i> and Common Seal <i>Phoca vitulina</i> . The extensive intertidal flats provide ideal conditions for Common Seal breeding and hauling-out.
<a href="#">The Wash Ramsar</a>	Bar-tailed Godwit, <i>Limosa lapponica</i> - Wintering Curlew, <i>Numenius arquata</i> - Wintering Dark-bellied Brent Goose, <i>Branta bernicla</i> - Wintering Dunlin, <i>Calidris alpina</i> - Wintering Estuary Grey Plover, <i>Pluvialis squatarola</i> - Wintering Harbour (Common) Seal, <i>Phoca vitulina</i> Knot, <i>Calidris canutus</i> - Wintering Oystercatcher, <i>Haematopus ostralegus</i> - Wintering Pink-footed Goose, <i>Anser brachyrhynchus</i> - Wintering Pintail, <i>Anas acuta</i> - Wintering	The Wash is the largest estuarine system in Britain. It is fed by the rivers Witham, Welland, Nene and Great Ouse. There are extensive saltmarshes, intertidal banks of sand and mud, shallow waters and deep channels. It is the most important staging post and over-wintering site for migrant wildfowl and wading birds in eastern England. It supports a valuable commercial fishery for shellfish and also an important nursery area for flatfish. It holds one of the North Sea's largest breeding populations of Common Seal <i>Phoca vitulina</i> and some Grey Seals <i>Halichoerus grypus</i> . The sublittoral area supports a number of different marine communities including colonies of the reef-building polychaete worm <i>Sabellaria spinulosa</i> .



European site	Designated features	Description
	Redshank, <i>Tringa totanus</i> - Wintering Sanderling, <i>Calidris alba</i> - Wintering Shelduck, <i>Tadorna tadorna</i> - Wintering Turnstone, <i>Arenaria interpres</i> - Wintering Waterbird assemblage - Wintering Wetland invertebrate assemblage	
<a href="#">The Wash SPA</a>	Bar-tailed Godwit, <i>Limosa lapponica</i> - A157, nb Bewick's Swan, <i>Cygnus columbianus bewickii</i> - A037, nb Black-tailed Godwit, <i>Limosa limosa islandica</i> - A616, nb Common Scoter, <i>Melanitta nigra</i> - A065, nb Common Tern, <i>Sterna hirundo</i> - A193, b Curlew, <i>Numenius arquata</i> - A160, nb Dark-bellied Brent Goose, <i>Branta bernicla bernicla</i> - A675, nb Dunlin, <i>Calidris alpina alpina</i> - A672, nb Gadwall, <i>Mareca strepera</i> - A051, nb Goldeneye, <i>Bucephala clangula</i> - A067, nb Grey Plover, <i>Pluvialis squatarola</i> - A141, nb Knot, <i>Calidris canutus</i> - A143, nb Little Tern, <i>Sternula albifrons</i> - A195, b Oystercatcher, <i>Haematopus ostralegus</i> - A130, nb Pink-footed Goose, <i>Anser brachyrhynchus</i> - A040, nb Pintail, <i>Anas acuta</i> - A054, nb Redshank, <i>Tringa totanus</i> - A162, nb Sanderling, <i>Calidris alba</i> - A144, nb Shelduck, <i>Tadorna tadorna</i> - A048, nb Turnstone, <i>Arenaria interpres</i> - A169, nb Waterbird assemblage Wigeon, <i>Mareca penelope</i> - A050, nb	<p>The Wash is located on the east coast of England and is the largest estuarine system in the UK. It is fed by the rivers Witham, Welland, Nene and Great Ouse that drain much of the east Midlands of England. The Wash comprises very extensive saltmarshes, major intertidal banks of sand and mud, shallow waters and deep channels. The eastern end of the site includes low chalk cliffs at Hunstanton. In addition, on the eastern side, the gravel pits at Snettisham are an important high-tide roost for waders. The intertidal flats have a rich invertebrate fauna and colonising beds of Glasswort <i>Salicornia</i> spp. which are important food sources for the large numbers of waterbirds dependent on the site. The sheltered nature of The Wash creates suitable breeding conditions for shellfish, principally Mussel <i>Mytilus edulis</i>, Cockle <i>Cardium edule</i> and shrimps. These are important food sources for some waterbirds such as Oystercatchers <i>Haematopus ostralegus</i>. The Wash is of outstanding importance for a large number of geese, ducks and waders, both in spring and autumn migration periods, as well as through the winter. The SPA is especially notable for supporting a very large proportion (over half) of the total population of Canada/Greenland breeding Knot <i>Calidris canutus islandica</i>. In summer, the Wash is an important breeding area for terns and as a feeding area for Marsh Harrier <i>Circus aeruginosus</i> that breed just outside the SPA. To the north, the coastal habitats of The Wash are continuous with Gibraltar Point SPA, whilst to the east The Wash adjoins the North Norfolk Coast SPA.</p>
<a href="#">Wicken Fen Ramsar</a>	Fen Wetland invertebrate assemblage Wetland plant assemblage	<p>This site is a marginal remnant of the original peat fenland of the East Anglian basin. It has been preserved as a flood catchment area and its water level is controlled by sluice gates. The vegetation has a strongly mosaic character due to extensive peat-cutting and different systems of crop exploitation. Areas of the site subjected to frequent cutting have a greater</p>

European site	Designated features	Description
		<p>species diversity including many sedges, rushes, spike rushes and marsh orchids with corresponding insect associations. Vegetation invasion by bushes resulting in closed <i>Frangula</i> carr, has occurred in the absence of mowing. The dykes, abandoned clay pits and the main lode support many aquatic angiosperms. Wildfowl interests include, mallard, teal, wigeon, shoveler, pochards and tufted duck.</p>

## Appendix 3: Screening for Likely Significant Effect

Screening table for likely significant effects including Main Modifications. Table is an updated version of the screening table at pre-submission, and the policy numbers etc reflect the pre-submission version. The MM ref number gives the reference for any modifications made to the policy, new policies that have been added at Main Modifications are shaded in blue. Policies where likely significant effects ('LSE') are identified are shaded grey.

Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
1 Foreword		Descriptive text, no policy	Screened out	No LSE. Descriptive text		Does not lead to development, so no effect on European sites.
<b>2 Introduction</b>						
2.1 Spatial Portrait		Descriptive text, no policy	Screened out	No LSE. Descriptive text		Does not lead to development, so no effect on European sites.
2.2 Key Sustainability Issues		Summarises sustainability appraisal findings. Descriptive text, no policy	Screened out	No LSE. Descriptive text		Highlights the importance of the borough for wildlife and natural resources. Does not lead to development, so no effect on European sites.
<b>3 Vision and Strategic Objectives (Where do we want to be in 2040?)</b>				No LSE. Descriptive text		
3.1 Vision and Objectives		Sets broad vision and defines set of 38 strategic objectives	Screened out	No LSE. Descriptive text		Vision is strategic and none of the objectives set a quantum of growth or particular location, so no effect on European sites.
<b>4 Spatial Strategy</b>						
LP01 - Spatial Strategy and Settlement Hierarchy Policy	MM008	Sets development priorities for the Borough, at a strategic level identifying focus for particular areas/places. Overall 5,889 dwellings with policy giving totals for different locations.	Screened in. Policy sets quantum and distribution of growth.	LSE. Policy which may have a significant effect on a site alone.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	Policy wording changed, and new housing total a minimum of 13,746. A range of risks to multiple sites. These are addressed and considered at allocation level in later parts of the Plan. Policy includes windfall numbers.
LP02 - Settlement Hierarchy Policy	MM010	Defines settlement hierarchy and which settlements in each tier – some changes to the	Screened out	No LSE. Policy removed.		Settlement tiers in accordance with LP01. This policy sets no

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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
		status of individual settlements and policy merged into revised LP01.				specific quantum of growth or defined locations.
New Policy - 'Residential development on windfall sites'	MM012	Policy supporting windfall and setting a range of criteria, including locations where supported	Not assessed (new policy at main modifications)	LSE. Policy which may have a significant effect on a site alone.	Policy cross references to LP01 and sets distribution of windfall. Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	Levels of windfall growth defined in Policy LP01.
New Policy - 'Neighbourhood Plans'	MM013	Policy supporting production of Neighbourhood Plans, listing settlements and numbers of houses plans will deliver	Not assessed (new policy at main modifications)	LSE. Policy which may have a significant effect on a site alone.	Policy identifies distribution and levels of growth. Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	Policy is screened in on a precautionary basis and levels of growth and distribution best assessed in relation to LP01. Neighbourhood plans will be in general conformity with the strategic policies in the Plan.
LP03 - Presumption in Favour of Sustainable Development Policy	MM015	General policy ensuring a positive approach to planning applications.	Screened out	No LSE. Policy wording changed. Modifications have no additional implications for the HRA.		Does not directly lead to development and so can have no effects on European sites
LP04 - Development Boundaries Policy	MM017	General policy stating how applications within settlement boundaries will be treated as opposed to those outside.	Screened out	No LSE. Policy removed.		
LP05 - Implementation Policy	MM018 - MM023	General policy setting out approach to infrastructure provision through CIL and S106 with detail of how contributions will be used.	Screened out	No LSE. Policy wording changed. Modifications have no additional implications for the HRA.		Includes green infrastructure including habitat creation/recreation facilities/landscaping which could include European site mitigation, however this is not explicit in the text.

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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
LP06- Climate Change Policy	MM028	Sets out how development shall address climate change issues including through minimising/reducing carbon emissions and adapting to/mitigating the impacts. Policy content scaled back from pre-submission version, to remove repetition of criteria in other policies within the Plan.	Screened out	No LSE. Policy wording changed. Modifications have no additional implications for the HRA.		Environmentally positive. Features of the policy, such as those to increase water efficiency and minimise air pollution may incidentally be positive for European sites (but are not mitigation).
<b>5 Economy and Transport</b>						
LP07 - The Economy Policy	MM034 - MM038	Sets overall level and distribution of employment land. Also general promotion of tourism. The overall quantum of employment land is increased, to reflect the inclusion of an addition site at Downham Market (Bexwell Business Park – existing commitment).	Screened in	LSE. Policy that may have a significant effect on a site alone.	Risks from recreation at the coastal sites, water-related issues and air-quality.	Policy wording changed, with allocation of employment land increasing to 85 ha. Policy highlights the promotion of the expansion of the tourism offer in Hunstanton to create a year-round economy and flags need for project level HRA.
LP08 - Retail Development Policy	MM042 - MM043	General policy with focus on town centres at King's Lynn, Downham Market and Hunstanton.	Screened out	No LSE. Policy wording changed. Modifications have no additional implications for the HRA.		No causal connection to European sites given the types of development and locations.
LP09 - Touring and Permanent Holiday Sites Policy	MM047 - MM048	General policies relating to caravan-based accommodation including touring and permanent units.	Screened out	No LSE. Policy wording changed. Modifications have no additional implications for the HRA.		General policy with no quantum of growth and clear requirement that project level HRA will be required.
LP10 - Development associated with the National Construct College, Bircham Newton (CITB) and RAF Marham Policy	MM050	Policy supporting development to improve facilities at three locations.	Screened out	No LSE. Policy wording changed. Modifications have no additional implications for the HRA.		Policy is general with no specific details. All sites are well back from European sites.
LP11 - Strategic Road and Major Road Network Policy	MM051	Policy protecting the Strategic Road Network including limiting development with direct access onto Network.	Screened out	No LSE. Policy wording changed. Modifications have no additional implications for the HRA.		General prescriptive policy. Does not lead to development, so no effect on European sites.

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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
LP12 - Disused Railway Trackways Policy		Safeguards disused trackways from development so as not to prejudice their future use for paths, cycleways, bridleways, new rail facilities etc.	Screened out	No LSE. Policy wording changed. Modifications have no additional implications for the HRA.		General policy and no specific development or new infrastructure proposed. Does not lead to development, so no effect on European sites. Creation of cycleways could be positive for European sites (reducing traffic) however some could also bring increased recreation use to certain European sites.
LP13 - Transportation Policy	MM054	Strategic approach to deliver sustainable transport network and connectivity outside the Borough and also approach to transport issues associated with new development.	Screened out	No LSE. Policy wording changed. Modifications have no additional implications for the HRA.		In general, an environmentally positive policy, e.g. through the support for increased rail and bus use. Does not lead to development, so no effect on European sites.
LP14 - Parking Provision in New Development Policy	MM057 - MM058	Sets general requirement for parking provision.	Screened out	No LSE. Policy wording changed. Modifications have no additional implications for the HRA.		Does not directly lead to development and so can have no effects on European sites
<b>6 Environment</b>						
LP15 - Coastal Areas Policy		Policy highlights the environmental sensitivities of the coast and approach balancing these with the need for economic and social development.	Screened in	LSE. Policy that may have a significant effect on a site alone.	LSE from recreation impacts to coastal sites.	Policy wording largely unchanged and policy remains screened in. Generally positive policy and no specific sites or proposals, however, includes promotion of visitor access in coastal areas and highlights need for protective measures for European sites. Issues addressed at appropriate assessment stage in consideration of mitigation for recreation impacts. It should be noted that no changes to sea defences are required as a result of the Plan and therefore LSE not triggered

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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
						with respect development leading to habitat loss within the European sites (as a result of coastal squeeze and sea defences becoming 'fixed'). These issues are addressed through the SMP.
LP16- Norfolk Coast AONB Policy		Limits development within the AONB unless particular requirements met	Screened out	No LSE. Policy wording changed. Modifications have no additional implications for the HRA.		Positive environmental policy and provides protection for the landscape. Incidental to European sites however many of the European sites are within the National Landscape.
LP17 - Coastal Change Management Area (Hunstanton to Dersingham) Policy	MM062	Limits development within area between Hunstanton to Dersingham where risk of flooding in a 1 in 200 AEP event	Screened out	No LSE. Policy wording changed. Modifications have no additional implications for the HRA.		Does not directly lead to development and so can have no effects on European sites
LP18 - Design and Sustainable Development Policy	MM064 - MM065	Sets standards relating to design, sustainability, energy efficiency, drainage, water use, density, flood risk and climate change	Screened out	No LSE. Policy wording changed. Modifications have no additional implications for the HRA.		Environmentally positive.
LP19 - Environmental Assets - Green Infrastructure, Landscape Character, Biodiversity and Geodiversity Policy	MM066	General policy relating to green infrastructure, soils, biodiversity and geodiversity. Includes restrictions on development within 1500m of the Breckland SPA/that support qualifying features.	Screened in	Bespoke policy intended to avoid or reduce harmful effects to a European site.	Needs to be taken to appropriate assessment with respect to general urban effects and avoidance of buildings and recreation	Policy wording changed. Policy provides clear buffer as mitigation relating to Stone Curlews and avoidance. Supportive text also describes recreation and approach to mitigation for recreation impacts. Following the ruling in People over Wind, cannot be taken into account in the screening decision and addressed in the appropriate

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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
						assessment sections where mitigation considered.
LP20 - Historic Environment Policy	MM077	Policy relating to historic environment covering listed buildings, scheduled monuments, archaeology, historic parks and gardens etc	Not assessed (new policy at main modifications)	No LSE. Policy that could not have any conceivable adverse effect on a site. Modifications have no additional implications for the HRA.		
LP21 - Environment, Design and Amenity Policy		General policy setting criteria for assessment of development in terms of impacts on neighbouring uses, including amenity.	Screened out	No LSE. Policy wording unchanged. Modifications have no additional implications for the HRA.		Does not directly lead to development and so can have no effects on European sites
LP22 - Provision of Recreational Open Space for Residential Developments Policy		Sets standards for open space requirements covering amenity, outdoor sport, allotments and children's play space.	Screened out	No LSE. Policy wording unchanged. Modifications have no additional implications for the HRA.		Does not directly lead to development and so can have no effects on European sites. Requirements for open space provision set out here do not relate to informal greenspace/European site mitigation
LP23 - Green Infrastructure Policy		Protects and enhances public rights of way and access and delivery of GI projects. Also includes mitigation from recreation impacts to European sites.	Screened in	Bespoke policy intended to avoid or reduce harmful effects to a European site. Policy wording unchanged. Policy remains screened in.	Needs to be taken to appropriate assessment with respect to recreation impacts	Policy provides mitigation for recreation impacts to European sites. Following the ruling in People Over Wind, cannot be taken into account in the screening decision. Issues addressed at appropriate assessment stage in consideration of mitigation for recreation impacts.



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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
LP24 - Renewable Energy Policy		Policy supports renewable energy (other than proposals for wind energy) and associated infrastructure, including the landward infrastructure for offshore renewables.	Screened out	No LSE. Policy wording unchanged. Modifications have no additional implications for the HRA.		Does not directly lead to development and so can have no effects on European sites. Policy wording ambiguous in relation to Habitats Regulations as indicates proposals will be assessed to determine whether or not the benefits they bring in terms of the energy generated are outweighed by the impacts, either individually or cumulatively, and then refers to a) international sites for nature conservation. Wording does not reflect the requirements of the legislation. Also b) specifically mentions SSSIs and Ramsar sites, both of which fall under a).
LP25 - Sites in Areas of Flood Risk Policy		Specifies requirements for sites in flood risk areas.	Screened out	No LSE. Policy wording unchanged. Modifications have no additional implications for the HRA.		Does not directly lead to development and so can have no effects on European sites
LP26 - Protection of Local Open Space Policy		Provides protection for open spaces in light of a range of factors including public access, recreational value and biodiversity.	Screened out	No LSE. Policy wording unchanged. Modifications have no additional implications for the HRA.		Incidentally likely to benefit European sites through potentially limiting loss of recreation space.
LP27 - Habitats Regulations Assessment (HRA) Policy	MM085 - MM086	Identifies the need for project level HRA and a package of protection measures for recreation impacts	Screened in	Bespoke policy intended to avoid or reduce harmful effects to a European site. Policy wording changed. Policy remains screened in.	Needs to be taken to appropriate assessment with respect to recreation, general urban effects and avoidance of buildings and air quality.	Supporting text repeats that for LP20. Sets out mitigation requirements for recreation impacts. Following the ruling in People over Wind, cannot be taken into account in the screening decision. Issues addressed at appropriate assessment stage in

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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
						consideration of mitigation for recreation impacts.
<b>7 Social and Community</b>						
7.1 Housing				No LSE. Descriptive text		
LP28 Affordable housing	MM091	Sets thresholds and other details relating to delivery of affordable housing	Screened out	No LSE. Policy wording changed. Modifications have no additional implications for the HRA.		Does not directly lead to development and so can have no effects on European sites.
LP29 Housing for the elderly and specialist care		Sets general criteria relating to these uses	Screened out	No LSE. Policy wording unchanged. Modifications have no additional implications for the HRA.		Does not directly lead to development and so can have no effects on European sites.
LP30 Accessible and Adaptable Homes		Sets general criteria relating to accessibility	Screened out	No LSE. Policy wording unchanged. Modifications have no additional implications for the HRA.		Does not directly lead to development and so can have no effects on European sites.
LP31 - Residential Development Reasonably Related to Existing Settlements Policy		Provides a framework for modest levels of growth by identifying general types of development/situations likely to be suitable.	Screened out	No LSE. Policy removed.		
New Policy - 'New Custom and Self-Build Housing Policy'	MM098		Not assessed (new policy at main modifications)	No LSE. General criteria and supporting self-build rather than setting any location or quantum of growth.		
New Policy - 'Gypsies, Travellers and Travelling Showpeople' [Assessed as part of separate HRA]						Subject to separate HRA

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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
LP32 - Houses in Multiple Occupation Policy		Sets out general criteria relating to whether the conversion of existing dwelling to and new development of properties for multiple occupation may be permitted.	Screened out	No LSE. Policy wording unchanged. Modifications have no additional implications for the HRA.		Does not directly lead to development and so can have no effects on European sites
LP33 - Enlargement or Replacement of Dwellings in the Countryside Policy		Sets out general criteria relating to whether replacement dwellings or extensions to existing dwellings will be approved	Screened out	No LSE. Policy wording unchanged. Modifications have no additional implications for the HRA.		Does not directly lead to development and so can have no effects on European sites
LP34 - Housing Needs of Rural Workers Policy		Sets out general criteria relating to whether housing will be approved for rural workers. Includes permanent, temporary and existing dwellings.	Screened out	No LSE. Policy wording unchanged. Modifications have no additional implications for the HRA.		Does not directly lead to development and so can have no effects on European sites
LP35 - Residential Annexes Policy		Sets out general criteria relating to whether residential annexes will be approved.	Screened out	No LSE. Policy wording unchanged. Modifications have no additional implications for the HRA.		Does not directly lead to development and so can have no effects on European sites
LP36 - Community and Culture Policy		Promotes community wellbeing through series of criteria relating to form, design, location and layout of development, the provision of community infrastructure and protection for community facilities	Screened out	No LSE. Policy wording unchanged. Modifications have no additional implications for the HRA.		Does not directly lead to development and so can have no effects on European sites
LP37 - Community Facilities Policy		Encourages retention of community facilities and sets criteria to ensure protection of community facilities	Screened out	No LSE. Policy wording unchanged. Modifications have no additional implications for the HRA.		Does not directly lead to development and so can have no effects on European sites
<b>8 Settlements &amp; Sites - Allocations and Policies</b>						
<b>9 King's Lynn &amp; Surrounding Area</b>						
9.1 King's Lynn		General text relating to issues and context	Screened out	No LSE. Descriptive text		Identifies HRA findings from Core Strategy relating to

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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
						recreation impacts at Roydon Common
LP38 - King's Lynn Policy	MM103 - MM106	Provides for at least 4,450 dwellings around King's Lynn, also employment (3,000 new jobs) and retail	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording changed. Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	Overarching policy for King's Lynn with quantum of growth for town.
E1.1 King's Lynn - Town Centre Policy	MM108	Defines town centre and use for town centre area	Screened out	No LSE. Policy wording changed. Modifications have no additional implications for the HRA.		Does not directly lead to development and so can have no effects on European sites
E1.2 King's Lynn - Port Policy	MM109	Protects and strengthens the role of the Port	Screened out	No LSE. Policy wording changed. Modifications have no additional implications for the HRA.		Policy is very general and does not directly lead to development and so can have no effects on European sites. It should be noted that any development coming forward in this area will need to address any risks relating to air quality implications for nearby sites including Roydon Common and Dersingham Bog SAC
E1.3 King's Lynn - Gaywood Clock Policy	MM111	Supports development for retail use	Screened out	No LSE. Policy wording changed. Modifications have no additional implications for the HRA.		Policy is very general and does not directly lead to development and so can have no effects on European sites. It should be noted that any development coming forward in this area will need to address any risks relating to air quality implications for nearby sites including Roydon Common and Dersingham Bog SAC

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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
E1 KLR - King's Lynn Riverfront Regeneration Area	MM116 - MM117	Collectively covers allocated sites E1.5, E1.8 and E1.10 at waterfront	Screened in	LSE. Policy which may have a significant effect on a site in combination.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	
E1.5 King's Lynn - Boal Quay Policy	MM120 - MM123	Residential allocation of 50 dwellings	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording changed to include employment land (1.8 ha). Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	LSE triggered alone for the Wash SPA/Ramsar and loss of supporting habitat/functionally linked land. Policy wording highlights need for project level HRA with respect to Roydon Common.
E1.6 King's Lynn - South of Parkway Policy	MM125 - MM128	Residential allocation of 226 dwellings	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording changed/housing requirement reduced. Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	LSE triggered alone for the Wash SPA/Ramsar and loss of supporting habitat/functionally linked land. Policy wording highlights need for project level HRA with respect to Roydon Common.
E1.7 King's Lynn - Land at Lynns Port Policy	MM130	Residential allocation of 96 dwellings	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording has changed. Modifications have no additional implications for the HRA, as housing numbers reduced to reflect delivery of	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	LSE triggered alone for the Wash SPA/Ramsar and loss of supporting habitat/functionally linked land

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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
				first two development phases. Policy remains screened in.		
E1.8 King's Lynn - South Quay Policy	MM132 - MM134	Residential allocation of 50 dwellings	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording changed. Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	LSE triggered alone for the Wash SPA/Ramsar and loss of supporting habitat/functionally linked land
E1.9 King's Lynn - Land west of Columbia Way Policy	MM137 - MM139	Residential allocation of 78 dwellings	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording changed to allocate at least 78 dwellings (previously 100 dwellings). Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	LSE triggered alone for the Wash SPA/Ramsar and loss of supporting habitat/functionally linked land. Policy wording highlights need for project level HRA with respect to Roydon Common.
E1.10 King's Lynn - North of Wisbech Road Policy	MM142 - 145	Residential allocation of 43 dwellings	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording changed reducing land allocation (2.1 ha) with at least 50 dwellings (first phase of 7 dwellings already delivered). Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	LSE triggered alone for the Wash SPA/Ramsar and loss of supporting habitat/functionally linked land. Policy wording highlights need for project level HRA with respect to Roydon Common.

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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
E1.11 King's Lynn - Southgates Policy	MM147	Residential allocation of 20 dwellings	Screened in	No LSE. Policy removed.		
E1.12 King's Lynn - Employment Land Policy	MM149	Identifies preferred locations for employment expansion in King's Lynn	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording changed to remove (3 ha) land at Hardwick. Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from water-related issues and air-quality.	LSE triggered alone for the Wash SPA/Ramsar and loss of supporting habitat/functionally linked land. Three sites allocated totalling 50ha.
E1.13 King's Lynn - Green Infrastructure Policy	MM151	Protects, enhances and extends strategic green infrastructure in and around King's Lynn. Includes elements of mitigation measures for European sites and recreation impacts.	Screened in	Bespoke policy intended to avoid or reduce harmful effects to a European site. Policy wording changed. Modifications have no additional implications for the HRA. Policy remains screened in.	Needs to be taken to appropriate assessment with respect to recreation.	Identifies the need for GI as mitigation for recreation impacts to Natura 2000 sites. Following the ruling in People Over Wind, cannot be taken into account in the screening decision.
9.3 West Lynn		Introduction and strategic background	Screened out	No LSE. Descriptive text		Simply provides context.
E1.14 West Lynn - Land West of St Peter's Road Policy	MM153	Residential allocation of 49 dwellings	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording changed. Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	LSE triggered alone for the Wash SPA/Ramsar and loss of supporting habitat/functionally linked land
E1.15 West Lynn - Land at Bankside Policy	MM155	Residential allocation of 120 dwellings	Screened in	No LSE. Policy removed.		
9.4 West Winch		Introduction and strategic background	Screened out	No LSE. Descriptive text		Simply provides context.
E2.1 West Winch Growth Area Strategic Policy	MM159 - MM171	Strategic policy with growth of 4,000 dwellings (2,030 within the Plan period).	Screened in	LSE. Policy which may have a significant effect on a site in-combination. Policy wording changed to allocate 4,000 dwellings. Implications for HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	

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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
E2.2 Development within existing built up areas of West Winch Policy		General policy, setting out that development within mapped areas will be in accordance with LP04 with provisos relating to traffic access onto the A10 and ensuring soft edge to countryside	Screened out	No LSE. Policy wording unchanged. No implications for HRA.		Does not directly lead to development and so can have no effects on European sites
9.5 South Wootton		Introduction and strategic background	Screened out	No LSE. Descriptive text, no policy.		Simply provides context.
E3.1 South Wootton Hall Lane Policy	MM179	Residential allocation of 575 dwellings	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording changed, including increased capacity from 300 to 575 dwellings to reflect consented schemes. Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	LSE triggered alone for the Wash SPA/Ramsar and loss of supporting habitat/functionally linked land
9.6 North Wootton		No allocations or specific policy; Plan includes a map of settlement boundary and recognises that there may be scope for windfall.	Screened out	No LSE. Descriptive text, no policy.		Does not directly lead to development and so can have no effects on European sites
<b>10 Main Towns</b>						
10.1 Downham Market		Introduction and strategic background	Screened out	No LSE. Descriptive text		Simply provides context.
10.1 LP39 - Downham Market Policy	MM183 - MM187	Policy provides land for at least 600 dwellings across two allocations and 31ha employment land	Screened in	LSE. Policy which may have a significant effect on a site in-combination. Policy wording has changed to allocate 600 new dwellings (up from 390 in the pre-submission Plan, to take account of consented schemes) and 31 ha of employment land. Implications for HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	



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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
F1.1 Downham Market Town Centre Area and Retailing Policy		Defines town centre and use for town centre area	Screened out	No LSE. Descriptive text		Does not directly lead to development and so can have no effects on European sites
F1.2 Downham Market Land off St. John's Way Policy		Employment allocation of just over 11ha.	Screened in	LSE. Policy which may have a significant effect on a site in-combination. Policy wording unchanged. Modifications have no additional implications for the HRA, as the reduced area reflects employment land completions on-site. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	
F1.3 Downham Market North-East: Land east of Lynn Road in vicinity of Bridle Lane Policy		Residential allocation of 300 dwellings	Screened in	LSE. Policy which may have a significant effect on a site in-combination. Policy wording unchanged, with the exception of increased capacity from the submission Plan to take account of existing consents. Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	
F1.4 Downham Market South-East: Land north of southern bypass in vicinity of Nightingale Lane Policy	MM188	Residential allocation of 300 dwellings	Screened in	LSE. Policy which may have a significant effect on a site in-combination. Policy wording has changed, with the exception of increased capacity from the submission Plan, to take account of existing consents. Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	
New Policy (F1.5) – Bexwell Business Park, Downham Market		Employment land allocated for 20ha to the east of Downham Market – east of A10 bypass	Previous screening undertaken as part of LP07 supporting text (section 10.1)	New site allocation is an extant commitment for 23ha, of which an initial development phase (3ha) has already been delivered (Karoo Close).		

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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
10.4 Hunstanton		Introduction and strategic background	Screened out	Numbering amended to 10.2. Descriptive text, no policy.		Simply provides context.
10.3 LP40 - Hunstanton Policy	MM190	Sets overarching strategy for town. Policy provides for 510 homes (120 allocated for the remainder of the Plan period).	Screened in	LSE. Policy which may have a significant effect on a site in-combination. Policy wording has changed. Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	
F2.1 Hunstanton Town Centre Area and Retailing Policy		Defines town centre and use for town centre area	Screened out	No LSE. Descriptive text		Does not directly lead to development and so can have no effects on European sites
F2.2 Hunstanton Land to the east of Cromer Road Policy	MM193	Residential allocation of 120 dwellings (mostly complete but final phase (12 dwellings) still to be delivered.	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording has changed. Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	LSE triggered alone for North Norfolk Coast SPA/Ramsar, the Wash SPA/Ramsar and loss of supporting habitat/functionally linked land
F2.3 Hunstanton Land South of Hunstanton Commercial Park Policy		Allocation for houses (110 dwellings) plus care and general housing units, with numbers and layout to be informed by master plan	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording unchanged. Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	LSE triggered alone for North Norfolk Coast SPA/Ramsar, the Wash SPA/Ramsar and loss of supporting habitat/functionally linked land
F2.4 Hunstanton Land north of Hunstanton Road Policy	MM194 - MM196	Residential allocation amounting to 163 dwellings and also 6.4ha open space	Screened in	No LSE. Policy removed because allocations at this site have been completed.		

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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
F2.5 Hunstanton Employment Land south of Hunstanton Commercial Park Land Policy		1ha allocation for employment use	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording unchanged. Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	LSE triggered alone for North Norfolk Coast SPA/Ramsar, the Wash SPA/Ramsar and loss of supporting habitat/functionally linked land
10.5 Wisbech Fringes (inc.Walsoken)		Introduction and strategic background	Screened out	Numbering amended to 10.3. Descriptive text, no policy.		Simply provides context.
F3.1 Wisbech Fringe - Land east of Wisbech (west of Burrettgate Road) Policy		Residential allocation of 550 dwellings	Screened in	LSE. Policy which may have a significant effect on a site in-combination. Policy wording unchanged. Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	
<b>11 Growth Key Rural Service Centres</b>						
11.1 Marham		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G56.1 Marham Land at The Street Policy		Residential allocation of 50 dwellings	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording unchanged. Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	LSE triggered alone for Breckland SPA and loss of supporting habitat/functionally linked land
11.1.2 MAR1- Marham, Land South of The Street Policy	MM203	Residential allocation of 35 dwellings	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording changed. Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	LSE triggered alone for Breckland SPA and loss of supporting habitat/functionally linked land
11.2 Watlington		Introduction and strategic background	Screened out	No LSE. Descriptive text		Simply provides context.

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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
G112.1 Watlington - Land south of Thieves Bridge Road Policy	MM207	Residential allocation of 40 dwellings	Screened in	LSE. Policy which may have a significant effect on a site in-combination. Policy wording changed to allocate at least 40 dwellings (32 dwellings – submission Plan). Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	
<b>12 Key Rural Service Centres</b>						
12.1 Brancaster with Brancaster Staithe/Burnham Deepdale		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G13.1 Brancaster - Land to the east of Mill Road Policy	MM211	Residential allocation of 5 dwellings	Screened in	No LSE. Policy removed because allocations at this site have been completed.		
G13.2 Brancaster Staithe and Burnham Deepdale - Land off The Close Policy	MM213	Residential allocation of 10 dwellings	Screened in	No LSE. Policy removed because allocations at this site have been completed.		
12.2 Burnham Market		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
12.3 Castle Acre		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G22.1 Castle Acre - Land west of Massingham Road	MM216 - MM217	Residential allocation of 16 dwellings	Screened in	No LSE. Policy removed because allocations at this site have been completed.		
12.4 Clenchwarton		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G25.1 Clenchwarton - Land between Wildfields Road and Hall Road Policy	MM219	Residential allocation of 10 dwellings	Screened in	No LSE. Policy removed because allocations at this site have been completed.		

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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
G25.2 Clenchwarton - Land north of Main Road Policy	MM221	Residential allocation of 20 dwellings	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording has changed. Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	LSE triggered alone for the Wash SPA/Ramsar and loss of supporting habitat/functionally linked land
G25.3 Clenchwarton - Land south of Main Road Policy	MM223	Residential allocation of 20 dwellings	Screened in	No LSE. Policy removed because allocations at this site have been completed.		
12.5 Dersingham		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G29.1 Dersingham - Land north of Doddshill Road Policy	MM226	Residential allocation of 20 dwellings	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording has changed, Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	LSE triggered alone for the Wash SPA/Ramsar and loss of supporting habitat/functionally linked land also water-related issues
G29.2 Dersingham - Land at Manor Road Policy	MM228	Residential allocation of 10 dwellings	Screened in	No LSE. Policy removed.		
12.6 Docking		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G30.1 Docking - Land situated off Pound Lane (Manor Pasture) Policy	MM232	Residential allocation of 20 dwellings	Screened in	No LSE. Policy removed because allocations at this site have been completed.		
12.7 East Rudham		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G31.1 East Rudham - Land off Fakenham Road Policy	MM235	Residential allocation of 10 dwellings	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording has changed. Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	Within River Wensum SAC catchment/Nutrient Neutrality Zone

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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
12.8 Emneth		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G34.1 Emneth - Land on south of The Wroe Policy	MM237	Residential allocation of 36 dwellings	Screened in	No LSE. Policy removed.		
12.9 Feltwell with Hockwold-cum-Wilton		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G35.1 Feltwell - Land to the rear of Chocolate Cottage, 24 Oak Street Policy	MM240 - MM241	Residential allocation of 50 dwellings	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording has changed. Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	LSE triggered alone for Breckland SPA and loss of supporting habitat/functionally linked land, also for general urban effects and avoidance of buildings. Policy wording highlights need for project level HRA.
G35.3 Feltwell - Land at 40 Lodge Lane / Skye Gardens Policy	MM243	Residential allocation of 10 dwellings	Screened in	No LSE. Policy removed because allocations at this site have been completed.		
12.10 Great Massingham		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G43.1 Great Massingham - Land south of Walcup's Lane Policy	MM246	Residential allocation of 16 dwellings	Screened in	LSE. Policy which may have a significant effect on a site in-combination. Policy wording has changed to allocate 16 dwellings (12 dwellings in submission Plan). Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	
12.11 Gayton	MM048	Overview, description and map of settlement boundary	Screened out	Descriptive text only, no policy. Amended title to 'Gayton'.		Simply provides context.
G41.1 Gayton - Land north of Back Street Policy	MM249	Residential allocation of 37 dwellings	Screened in	LSE. Policy which may have a significant effect on a site in-combination. Policy wording has changed to accommodate 37 dwellings instead of 23. Modifications have no	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	

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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
				additional implications for the HRA. Policy remains screened in.		
G41.2 Grimston and Pott Row - Land adjacent Stave Farm, west of Ashwicken Road	MM251	Residential allocation of 23 dwellings	Screened in	No LSE. Policy removed because allocations at this site have been completed.		
12.12 Heacham		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G47.1 Heacham - Land off Cheney Hill Policy	MM254	Residential allocation of 133 dwellings	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording has changed to allocate 133 dwellings (60 dwellings in submission Plan). Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	LSE triggered alone for the Wash SPA/Ramsar and loss of supporting habitat/functionally linked land
G47.2 Heacham - Land to the south of St. Mary's Close Policy	MM257	Residential allocation of 6 dwellings	Screened in	No LSE. Policy removed because allocations at this site have been completed.		
12.13 Marshland St James/ St John's Fen End with Tilney Fen End		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G57.1 Marshland St James Land adjacent to Marshland Saint James Primary School Policy	MM260	Residential allocation of 15 dwellings	Screened in	No LSE. Policy removed because allocations at this site have been completed.		
G57.2 Marshland St James Land adjacent 145 Smeeth Road Policy	MM262 - MM263	Residential allocation of 4 dwellings	Screened in	LSE. Policy which may have a significant effect on a site in-combination. Policy wording has changed to allocate 4 dwellings (10 dwellings in submission Plan). Modifications have no	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	

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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
				additional implications for the HRA. Policy remains screened in.		
12.14 Methwold with Northwold		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G59.1 Methwold - Land at Crown Street Policy	MM266	Residential allocation of 5 dwellings	Screened in	No LSE. Policy removed because allocations at this site have been completed.		
G59.2 Methwold - Land at Herbert Drive Policy	MM268	Residential allocation of 25 dwellings	Screened in	Policy removed because allocations at this site have been completed. Screened out.		
G59.3 Methwold - Land at Hythe Road Policy	MM270	Residential allocation of 10 dwellings	Screened in	Policy removed because allocations at this site have been completed. Screened out.		
G59.4 Methwold - Land off Globe Street/St George's Court Policy	MM272	Residential allocation of 5 dwellings	Screened in	Policy removed because allocations at this site have been completed. Screened out.		
12.15 Middleton		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
12.16 Snettisham		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G83.1 Snettisham Land south of Common Road and behind Teal Close Policy	MM276	Residential allocation of 34 dwellings	Screened in	Policy removed because allocations at this site have been completed. Screened out.		
12.17 Southery		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.



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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
G85.1 Southery - Land off Lions Close Policy	MM279	Residential allocation of 15 dwellings	Screened in	Policy removed because allocations at this site have been completed. Screened out.		
12.18 Stoke Ferry		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G88.1 Stoke Ferry - Land South of Lark Road/ Wretton Road Policy	MM283 - MM285	Residential allocation of 13 dwellings	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording has changed to allocate 13 dwellings (5 dwellings in submission Plan). Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	LSE triggered alone for Breckland SPA and loss of supporting habitat/functionally linked land
G88.2 Stoke Ferry - Land at Bradfield Place Policy	MM287 - MM288	Residential allocation of 10 dwellings	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording has changed. Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	LSE triggered alone for Breckland SPA and loss of supporting habitat/functionally linked land
G88.3 Stoke Ferry - Land at Indigo Road / Lynn Road Policy	MM290 - MM292	Residential allocation of 29 dwellings	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording has changed to allocate 29 dwellings (12 dwellings in submission Plan). Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	LSE triggered alone for Breckland SPA and loss of supporting habitat/functionally linked land
12.19 Terrington St Clement		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G93.1 Terrington St. Clement - Land at Church Bank, Chapel Road Policy	MM295	Residential allocation of 10 dwellings	Screened in	Policy removed because allocations at this site have been completed. Screened out.		

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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
G93.2 Terrington St. Clement - Land Adjacent King William Close Policy	MM297	Residential allocation of 17 dwellings	Screened in	Policy removed because allocations at this site have been completed. Screened out.		
G93.3 Terrington St. Clement - Land West of Benn's Lane Policy	MM299	Residential allocation of 43 dwellings	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording has changed to allocate 43 dwellings (35 in submission Plan). Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	LSE triggered alone for the Wash SPA/Ramsar and loss of supporting habitat/functionally linked land
TSC1 Terrington St Clement Land south of Northgate Way and west of Benn's Lane Policy	MM301 - MM302	Residential allocation of 76 dwellings	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording has changed. Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	LSE triggered alone for the Wash SPA/Ramsar and loss of supporting habitat/functionally linked land
12.20 Terrington St John with St Johns Highway/Tilney St Lawrence		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G94.1 Terrington St John, St John's Highway and Tilney St Lawrence- Land East of School Road Policy	MM304	Residential allocation of 40 dwellings	Screened in	LSE. Policy which may have a significant effect on a site in-combination. Policy wording has changed to accommodate 40 dwellings (was 35 in submission Plan). Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	
12.21 Upwell/Outwell		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G104.1 Upwell - Land north west of Townley Close Policy	MM307	Residential allocation of 5 dwellings	Screened in	Policy removed because allocations at this site have been completed. Screened out.		

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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
G104.2 Upwell - Land south/ east of Townley Close Policy	MM309	Residential allocation of 5 dwellings	Screened in	Policy removed because allocations at this site have been completed. Screened out.		
G104.3 Upwell - Land at Low Side Policy		Residential allocation of 5 dwellings	Screened in	No LSE. Policy removed because allocations at this site have been completed. Screened out.		
G104.4 Upwell - Land off St Peter's Road Policy	MM311	Residential allocation of 15 dwellings	Screened in	Policy removed because allocations at this site have been completed. Screened out.		
G104.5 Outwell - Land at Wisbech Road Policy	MM313	Residential allocation of 40 dwellings	Screened in	LSE. Policy which may have a significant effect on a site in-combination. Policy wording changed to allocate 40 dwellings (5 dwellings in submission Plan). Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	
G104.6 Outwell - Land Surrounding Isle Bridge Policy	MM315	Residential allocation of 50 dwellings	Screened in	Policy wording changed to allocate 50 dwellings (35 in submission Plan). Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	
12.22 Walpole St Peter/Walpole St Andrew/Walpole Marsh		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.

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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
G109.1 Walpole St. Peter - Land south of Walnut Road Policy	MM318 - MM320	Residential allocation of 9 dwellings	Screened in	LSE. Policy which may have a significant effect on a site in-combination. Policy wording has changed to allocate 9 dwellings (10 dwellings in submission Plan). Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	
G109.2 Walpole St. Peter - Land south of Church Road Policy	MM322	Residential allocation of 10 dwellings	Screened in	Policy removed because allocations at this site have been completed. Screened out.		
12.23 West Walton		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
<b>13 Rural West Norfolk</b>	MM325	General policy setting the strategy for rural areas, with broad focus around Growth Key Rural Centres and Key Rural Service Centres	Screened out	No LSE. Section removed from Plan and no longer relevant.		
13.1 LP39 – Development in Rural Areas Policy	MM326	Sets broad criteria for how development in rural areas could come forward	Screened out	Policy number amended to LP41 and section removed.		Does not directly lead to development and so can have no effects on European sites
<b>14 Rural Villages</b>						
14.1 Burnham Overy Staithe	MM327	Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
14.2 Castle Rising	MM328	Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
14.3 Denver	MM329	Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.

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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
G28.1 Denver - Land South of Sluice Road	MM330 - MM331	Residential allocation of 6 dwellings	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording has changed to accommodate 6 dwellings (was 8 in submission Plan). Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	LSE triggered alone for the Ouse Washes SPA/Ramsar and loss of supporting habitat/functionally linked land
14.4 East Winch		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G33.1 East Winch - Land South of Gayton Road	MM334	Residential allocation of 10 dwellings	Screened in	No LSE. Descriptive text		
14.5 Fincham		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G36.1 Fincham - Land East of Marham Road	MM337 - MM338	Residential allocation of 5 dwellings	Screened in	LSE. Policy which may have a significant effect on a site in-combination. Policy wording has changed. Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	
14.6 Flitcham		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
14.7 Great Bircham/Bircham Tofts		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G42.1 Great Bircham and Bircham Tofts - Land Adjacent to 16 Lynn Road	MM342	Residential allocation of 10 dwellings	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording has changed. Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	Within River Wensum SAC catchment/Nutrient Neutrality Zone
14.8 Harpley		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.

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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
G45.1 Harpley- Land at Nethergate Street/School Lane	MM345	Residential allocation of 5 dwellings	Screened in	Policy removed because allocations at this site have been completed. Screened out.		
14.9 Hilgay		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G48.1 Hilgay - Land South of Foresters Avenue	MM348 - MM350	Residential allocation of 16 dwellings	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording has changed to allocate 16 dwellings (12 dwellings in the submission Plan). Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	LSE triggered alone for the Ouse Washes SPA/Ramsar and loss of supporting habitat/functionally linked land
14.10 Hillington		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
14.11 Ingoldisthorpe		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G52.1 Ingoldisthorpe - Land opposite 143-161 Lynn Road	MM354	Residential allocation of 10 dwellings	Screened in	Policy removed because allocations at this site have been completed. Screened out.		
14.12 Old Hunstanton		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
14.13 Runcton Holme		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G72.1 Runcton Holme - Land at School Road	MM358	Residential allocation of 10 dwellings	Screened in	Policy removed because allocations at this site have been completed. Screened out.		
14.14 Sedgeford		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.

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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
G78.1 Sedgeford - Land off Jarvie Close	MM362 - MM364	Residential allocation of 11 dwellings	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording has changed to allocate 11 dwellings (10 dwellings in the submission Plan). Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	LSE triggered alone for the the Wash SPA/Ramsar and loss of supporting habitat/functionally linked land
H1 Policy H1: Development of site allocated at Jarvie Close	MM365	Residential allocation of 11 dwellings	Screened in	Policy removed (duplication). Screened out.		
14.15 Shouldham		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G81.2 Shouldham - Land accessed from Rye's Close	MM368	Residential allocation of 5 dwellings	Screened in	Policy removed because allocations at this site have been completed. Screened out.		
14.16 Stow Bridge		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
14.17 Syderstone		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G91.1 Syderstone - Land West of No.26 The Street	MM372	Residential allocation of 5 dwellings	Screened in	Policy removed because allocations at this site have been completed. Screened out.		
14.18 Ten Mile Bank		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
14.19 Thornham		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
14.20 Three Holes		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
14.21 Tilney All Saints		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.

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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
G97.1 Tilney All Saints - Land between School Road and Lynn Road	MM378	Residential allocation of 5 dwellings	Screened in	Policy removed because allocations at this site have been completed. Screened out.		
14.22 Walpole Cross Keys		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
14.23 Walpole Highway		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G106.1 Walpole Highway - Land East of Hall Road	MM382 - MM383	Residential allocation of 8 dwellings	Screened in	LSE. Policy which may have a significant effect on a site in-combination. Policy wording has changed to allocate 8 dwellings (10 dwellings in the submission Plan). Modifications have no additional implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	
14.24 Walton Highway		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G120.1 Walton Highway - Land adjacent to Common Road	MM386	Residential allocation of 10 dwellings	Screened in	Policy removed because allocations at this site have been completed. Screened out.		
14.25 Welney		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G113.1 Welney - Former Three Tuns/Village Hall	MM389	Residential allocation of 4 dwellings	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording has changed to allocate 4 dwellings (7 dwellings in the submission Plan). Implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	LSE triggered alone for the Ouse Washes SPA/Ramsar and loss of supporting habitat/functionally linked land also general urban effects and avoidance of buildings and water-related issues. Policy wording highlights need for project level HRA.



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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
G113.2 Welney - Land off Main Street	MM391	Residential allocation of 17 dwellings	Screened in	LSE. Policy which may have a significant effect on a site alone. Policy wording has changed to allocate 17 dwellings (13 dwellings in the submission Plan of which an initial phase has already been delivered). Implications for the HRA. Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	LSE triggered alone for the Ouse Washes SPA/Ramsar and loss of supporting habitat/functionally linked land also general urban effects and avoidance of buildings and water-related issues. Policy wording highlights need for project level HRA.
14.26 Wereham		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G114.1 Wereham - Land to the rear of 'Natanya', Hollies Farm	MM394	Residential allocation of 8 dwellings	Screened in	Policy removed because allocations at this site have been completed. Screened out.		
14.27 West Newton		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
14.28 Wiggenhall St. Germans		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
G123.1 Wiggenhall St. Germans - Land North of Mill Road	MM398 - MM399	Residential allocation of 4 dwellings	Screened in	LSE. Policy which may have a significant effect on a site in-combination. Policy has changed to allocate 4 dwellings (5 dwellings in submission Plan). Policy remains screened in.	Risks from loss of supporting habitat/functionally linked land, general urban effects/avoidance of buildings, recreation, water-related issues and air-quality.	
14.29 Wiggenhall St. Mary Magdalen		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
14.30 Wimbotsham		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.
14.31 Wormegay		Overview, description and map of settlement boundary	Screened out	No LSE. Descriptive text		Simply provides context.

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Plan section or policy (as in pre-submission)	MM Ref No	Description	Screening at Pre-submission	Screening at Main Modifications 2024	Potential risks to European sites	Comments
15 Smaller Villages & Hamlets		Identifies smaller villages and hamlets which do not have any specific site allocations. Development boundaries mapped for each.	Screened out	No LSE. Descriptive text		Simply provides context. Does not set a quantum of development or any specific allocations
16 Monitoring and Delivery Framework		Sets monitoring requirements	Screened out			Does not lead to any development in itself.
17 Glossary		Administrative text	Screened out			

## Appendix 4: Distances from allocations to European sites

This table gives the distance in km from each allocation to each European site. Distances are from the nearest parts of the boundary of the allocation to the boundary of the European site. Shading reflects distances (red close, green further away).

Allocation	Breckland SAC	Breckland SPA	Dersingham Bog Ramsar	Norfolk Valley Fens SAC	North Norfolk Coast Ramsar	North Norfolk Coast SAC	North Norfolk Coast SPA	Ouse Washes Ramsar	Ouse Washes SAC	Ouse Washes SPA	River Wensum SAC	Roydon Common & Dersingham Bog SAC	Roydon Common Ramsar	The Wash & North Norfolk Coast SAC	The Wash Ramsar	The Wash SPA
E1.10	24.55	17.13	10.04	18.48	11.10	25.60	25.84	25.60	17.84	17.84	20.83	24.53	6.26	6.26	4.72	4.72
E1.12-EST	26.81	19.12	8.03	16.03	12.42	23.32	23.54	23.32	20.27	20.27	23.22	24.20	6.16	6.16	2.38	2.38
E1.12-HAR	23.03	15.30	9.20	18.36	8.88	25.03	25.32	25.03	17.81	17.81	20.87	22.46	4.36	4.36	5.84	5.84
E1.12-SAD	23.38	16.34	11.31	19.92	10.91	26.96	27.22	26.96	15.92	15.92	18.90	25.14	7.03	7.03	6.07	6.07
E1.14	25.77	18.35	9.77	17.88	12.19	25.14	25.37	25.14	18.51	18.51	21.46	25.09	6.82	6.82	3.81	3.81
E1.5	24.91	17.47	9.74	18.16	11.39	25.28	25.52	25.28	18.10	18.10	21.08	24.59	6.29	6.29	4.47	4.47
E1.6	23.97	16.28	8.80	17.72	9.82	24.55	24.82	24.55	18.70	18.70	21.74	22.96	4.70	4.70	5.08	5.08
E1.7	25.29	17.42	7.45	16.27	10.47	23.14	23.40	23.14	19.84	19.84	22.85	22.42	4.24	4.24	3.89	3.89
E1.8	25.22	17.75	9.73	18.10	11.58	25.24	25.48	25.24	18.38	18.38	21.35	24.68	6.39	6.39	4.34	4.34
E1.9	25.65	17.91	7.86	16.40	11.20	23.41	23.66	23.41	19.87	19.87	22.87	23.20	5.06	5.06	3.53	3.53
E2.1	20.45	13.73	10.58	19.71	8.86	26.42	26.70	26.42	13.61	13.61	16.67	23.51	5.69	5.69	6.77	6.77
E3.1	25.90	17.92	5.54	14.42	10.68	21.20	21.47	21.20	21.26	21.26	24.28	21.35	3.60	3.60	3.54	3.54
F1.2	18.45	15.75	25.63	34.63	14.66	41.49	41.78	41.49	1.44	1.44	4.44	35.05	20.02	20.02	20.39	20.39
F1.3	16.45	13.94	24.00	33.24	12.78	39.88	40.19	39.88	4.18	4.18	7.09	32.73	18.20	18.20	19.31	19.31
F1.4	16.68	14.18	25.96	35.21	12.84	41.83	42.16	41.83	2.85	2.85	5.32	34.20	20.12	20.12	21.24	21.24
F2.2	41.23	32.76	11.56	0.50	25.18	2.37	2.56	2.37	41.01	41.01	44.02	20.94	11.56	18.26	0.50	0.50
F2.3	39.90	31.44	10.12	0.88	23.81	3.73	3.92	3.73	39.58	39.58	42.60	20.18	10.12	16.81	0.86	0.86
F2.5	40.10	31.64	10.33	0.83	24.02	3.80	3.99	3.80	39.79	39.79	42.80	20.32	10.33	17.03	0.82	0.82
F3.1	31.76	27.97	25.59	31.81	25.58	39.74	39.94	39.74	13.05	13.05	13.54	40.94	22.82	22.82	16.23	16.23

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Allocation	Breckland SAC	Breckland SPA	Dersingham Bog Ramsar	Norfolk Valley Fens SAC	North Norfolk Coast Ramsar	North Norfolk Coast SAC	North Norfolk Coast SPA	Ouse Washes Ramsar	Ouse Washes SAC	Ouse Washes SPA	River Wensum SAC	Roydon Common & Dersingham Bog SAC	Roydon Common Ramsar	The Wash & North Norfolk Coast SAC	The Wash Ramsar	The Wash SPA
G104.5	27.33	22.85	28.62	36.11	23.51	43.79	43.98	43.79	7.16	7.14	7.35	41.36	24.25	24.25	21.47	21.47
G104.6	27.48	23.05	28.53	35.98	23.66	43.67	43.86	43.67	7.35	7.34	7.55	41.38	24.22	24.22	21.35	21.35
G106.1	29.49	24.49	20.33	26.81	21.09	34.68	34.87	34.68	13.84	13.84	15.81	35.93	17.70	17.70	12.11	12.11
G109.1	32.24	26.76	19.79	25.35	22.59	33.32	33.52	33.32	17.04	17.04	18.96	36.50	18.25	18.25	9.66	9.66
G112.1	18.90	13.88	18.09	27.21	12.17	33.96	34.25	33.96	9.52	9.52	12.60	28.70	12.55	12.55	13.36	13.36
G113.1	23.06	16.73	36.97	45.32	22.67	52.66	52.89	52.66	0.01	0.01	0.01	46.77	31.72	31.72	30.67	30.67
G113.2	23.32	16.98	36.85	45.17	22.82	52.52	52.75	52.52	0.27	0.27	0.27	46.79	31.62	31.62	30.51	30.51
G123.1	22.73	16.61	15.06	23.54	12.76	30.70	30.95	30.70	13.00	13.00	15.95	28.15	10.46	10.46	9.21	9.21
G25.2	27.31	20.08	10.51	17.94	14.06	25.50	25.68	25.50	18.71	18.71	21.56	26.70	8.54	8.54	3.29	3.29
G28.1	17.52	14.35	27.23	36.38	13.64	43.11	43.42	43.11	2.28	2.28	4.44	35.61	21.46	21.46	22.27	22.27
G29.1	29.92	21.47	1.01	8.21	13.75	13.34	13.80	13.34	30.55	30.55	33.63	15.03	1.01	6.84	4.08	4.08
G31.1	26.67	19.47	14.63	15.16	15.27	14.89	15.14	14.89	36.60	36.60	39.57	1.49	14.19	14.19	15.16	17.79
G35.1	4.05	0.07	37.35	47.06	9.32	52.50	52.73	52.50	16.46	16.46	16.46	36.99	30.99	30.99	34.82	34.82
G36.1	11.15	7.37	21.44	31.16	8.37	36.86	37.27	36.86	11.51	11.51	14.05	26.15	15.11	15.11	19.27	19.27
G41.1	18.48	10.08	10.47	19.65	2.25	24.42	24.57	24.42	22.33	22.33	25.36	15.10	4.41	4.41	13.04	13.04
G42.1	30.16	21.92	8.35	11.73	15.41	11.83	11.83	11.83	35.35	35.35	38.44	8.63	8.35	10.91	11.32	11.32
G43.1	21.04	13.16	12.76	19.66	8.64	20.78	21.03	20.78	30.01	30.01	32.95	7.30	9.38	9.38	15.76	15.76
G47.1	36.91	28.44	6.95	1.38	20.75	6.87	7.12	6.87	36.49	36.49	39.52	18.70	6.95	13.64	1.25	1.25
G48.1	15.65	10.99	30.44	39.75	12.83	46.30	46.64	46.30	4.63	4.63	4.63	37.25	24.51	24.51	25.77	25.77
G56.1	11.73	4.68	18.14	27.74	5.46	33.03	33.29	33.03	15.42	15.42	18.16	21.80	11.67	11.67	17.58	17.58
G57.2	27.38	23.21	22.31	29.46	20.87	37.20	37.40	37.20	10.55	10.55	12.40	36.56	18.69	18.69	14.90	14.90
G78.1	35.88	27.44	7.22	4.64	20.02	6.70	7.26	6.70	37.29	37.29	40.35	15.87	7.22	13.51	4.58	4.58
G88.1	8.41	5.90	28.47	38.18	4.45	43.76	44.08	43.76	11.64	11.64	12.82	30.45	22.13	22.13	26.04	26.04
G88.2	8.51	5.99	27.98	37.69	4.57	43.29	43.62	43.29	11.41	11.41	12.70	30.19	21.64	21.64	25.54	25.54

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Allocation	Breckland SAC	Breckland SPA	Dersingham Bog Ramsar	Norfolk Valley Fens SAC	North Norfolk Coast Ramsar	North Norfolk Coast SAC	North Norfolk Coast SPA	Ouse Washes Ramsar	Ouse Washes SAC	Ouse Washes SPA	River Wensum SAC	Roydon Common & Dersingham Bog SAC	Roydon Common Ramsar	The Wash & North Norfolk Coast SAC	The Wash Ramsar	The Wash SPA
G88.3	8.11	5.59	28.06	37.77	4.17	43.32	43.63	43.32	11.86	11.86	13.14	29.95	21.72	21.72	25.75	25.75
G93.3	30.28	23.43	12.96	18.90	17.74	26.81	27.01	26.81	19.32	19.32	21.91	30.14	12.15	12.15	5	5
G94.1	27.88	22.70	18.91	25.80	19.25	33.59	33.78	33.59	13.15	13.15	15.40	34.14	15.95	15.95	11.32	11.32
MAR1	11.75	4.95	18.33	27.96	5.93	33.32	33.61	33.32	15.09	15.09	17.82	22.26	11.88	11.88	17.56	17.56
TSC1	30.38	23.55	12.95	18.84	17.82	26.73	26.92	26.73	19.35	19.35	21.93	30.16	12.18	12.18	4.98	4.98

## Appendix 5: Allocations and relevant zones from the GIRAMS

This appendix summarises all allocations and the relevant zones of influence (as set out in the GIRAMS). “x” indicates that the allocation is within the zone of influence. The zones of influenced used are those in the most recent action plan report.

\*No allocations fall within the Norfolk Valley Fens zone as the action plan rules out impacts from recreation for certain component SSSIs within the SAC, as a consequence the 14.7km zone of influence is only applied to certain SSSIs, all of which are well outside the Borough. Only a very small part of the Borough, towards the Brecks, is within the zone.

Policy/allocation	Breckland SAC/SPA	Norfolk Valley Fens SAC	North Norfolk Coast SAC/SPA/Ramsar	Roydon Common & Dersingham Bog SAC/Dersingham Bog Ramsar, Roydon Common Ramsar	The Wash & North Norfolk Coast SAC/The Wash SPA/Ramsar
<b>Relevant zone from GIRAMS action plan (km)</b>	<b>26.3</b>	<b>14.7*</b>	<b>40.6</b>	<b>10.4</b>	<b>58.4</b>
E1 KLR – King's Lynn Riverfront Regeneration Area	x		x	x	x
E1.5 King's Lynn - Boal Quay Policy	x		x	x	x
E1.6 King's Lynn - South of Parkway Policy	x		x	x	x
E1.7 King's Lynn - Land at Lynnsport Policy	x		x	x	x
E1.8 King's Lynn - South Quay Policy	x		x	x	x
E1.9 King's Lynn - Land west of Columbia Way Policy	x		x	x	x
E1.10 King's Lynn - North of Wisbech Road Policy	x		x	x	x
E1.14 West Lynn - Land West of St Peter's Road Policy	x		x	x	x

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Policy/allocation	Breckland SAC/SPA	Norfolk Valley Fens SAC	North Norfolk Coast SAC/SPA/Ramsar	Roydon Common & Dersingham Bog SAC/Dersingham Bog Ramsar, Roydon Common Ramsar	The Wash & North Norfolk Coast SAC/The Wash SPA/Ramsar
E2.1 West Winch Growth Area Strategic Policy	X		X	X	X
E3.1 South Wootton Hall Lane Policy	X		X	X	X
F1.2 Downham Market Land off St. John's Way Policy	X				X
F1.3 Downham Market North-East: Land east of Lynn Road in vicinity of Bridle Lane Policy	X		X		X
F1.4 Downham Market South-East: Land north of southern bypass in vicinity of Nightingale Lane Policy	X				X
F2.2 Hunstanton Land to the east of Cromer Road Policy			X		X
F2.3 Hunstanton Land South of Hunstanton Commercial Park Policy			X	X	X
F2.5 Hunstanton Employment Land south of Hunstanton Commercial Park Land Policy			X	X	X
F3.1 Wisbech Fringe - Land east of Wisbech (west of Burrettgate Road) Policy			X		X
G56.1 Marham Land at The Street Policy	X		X		X
11.1.2 MAR1- Marham, Land South of The Street Policy	X		X		X
G112.1 Watlington - Land south of Thieves Bridge Road Policy	X		X		X
G25.2 Clenchwarton - Land north of Main Road Policy	X		X	X	X
G29.1 Dersingham - Land north of Doddshill Road Policy	X		X	X	X

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Policy/allocation	Breckland SAC/SPA	Norfolk Valley Fens SAC	North Norfolk Coast SAC/SPA/Ramsar	Roydon Common & Dersingham Bog SAC/Dersingham Bog Ramsar, Roydon Common Ramsar	The Wash & North Norfolk Coast SAC/The Wash SPA/Ramsar
G31.1 East Rudham - Land off Fakenham Road Policy	X		X		X
G35.1 Feltwell - Land to the rear of Chocolate Cottage, 24 Oak Street Policy	X				X
G43.1 Great Massingham - Land south of Walcup's Lane Policy	X		X	X	X
G41.1 Gayton - Land north of Back Street Policy	X		X	X	X
G47.1 Heacham - Land off Cheney Hill Policy			X	X	X
G57.2 Marshland St James Land adjacent 145 Smeeth Road Policy	X		X		X
G88.1 Stoke Ferry - Land South of Lark Road/ Wretton Road Policy	X				X
G88.2 Stoke Ferry - Land at Bradfield Place Policy	X				X
G88.3 Stoke Ferry - Land at Indigo Road / Lynn Road Policy	X				X
G93.3 Terrington St. Clement - Land West of Benn's Lane Policy	X		X		X
TSC1 Terrington St Clement Land south of Northgate Way and west of Benn's Lane Policy	X		X		X
G94.1 Terrington St John, St John's Highway and Tilney St Lawrence- Land East of School Road Policy	X		X		X
G104.5 Outwell - Land at Wisbech Road Policy	X				X



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Policy/allocation	Breckland SAC/SPA	Norfolk Valley Fens SAC	North Norfolk Coast SAC/SPA/Ramsar	Roydon Common & Dersingham Bog SAC/Dersingham Bog Ramsar, Roydon Common Ramsar	The Wash & North Norfolk Coast SAC/The Wash SPA/Ramsar
G104.6 Outwell - Land Surrounding Isle Bridge Policy	X				X
G109.1 Walpole St. Peter - Land south of Walnut Road Policy			X		X
G28.1 Denver - Land South of Sluice Road	X				X
G36.1 Fincham - Land East of Marham Road	X		X		X
G42.1 Great Bircham and Bircham Tofts - Land Adjacent to 16 Lynn Road	X		X	X	X
G48.1 Hilgay - Land South of Foresters Avenue	X				X
G78.1 Sedgeford - Land off Jarvie Close			X	X	X
G106.1 Walpole Highway - Land East of Hall Road	X		X		X
G113.1 Welney - Former Three Tuns/Village Hall	X				X
G113.2 Welney - Land off Main Street	X				X
G123.1 Wiggenhall St. Germans - Land North of Mill Road	X		X		X
<b>Total sites</b>	<b>68</b>	<b>0</b>	<b>62</b>	<b>36</b>	<b>83</b>