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Our ref: 475626
Your ref: N/A



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BY EMAIL ONLY

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Dear Mr Burton

King's Lynn & West Norfolk BC Local Plan - Gypsy and Travellers and Travelling Showpeople Proposed Site Allocations and Policy Consultation, May 2024

Thank you for your consultation on the above dated 10 May 2024 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has reviewed the documents as provided below, and has the following comments to make:

- Gypsy and Traveller Proposed Sites and Policy Consultation Document (May 2024);
- Gypsy and Traveller Sustainability Assessment Addendum Report (May 2024);
- Habitats Regulations Assessment of Gypsy and Traveller and Travelling Showpeople Sites (Capita, May 2024)

i) Norfolk Recreational Impact Avoidance and Mitigation Strategy (GIRAMS)

As per Natural England's previous response (our ref 465015, dated 1 March 2024), all of the proposed site allocations for gypsy, traveller and travelling showpeople, fall within the 'Zone of Influence' (Zoi) for multiple European designated sites scoped into the Norfolk Green Infrastructure and Recreational disturbance Avoidance and Mitigation Strategy ('GIRAMS'). It is anticipated that certain types of development resulting in net additional dwellings (see Section 3.4.1. of the [GIRAMS report](#) for a list of qualifying development), in this area are 'likely to have a significant effect' on the sensitive interest features of these European designated sites, through increased recreational pressure when considered either, alone, or 'in combination' with other plans and projects.

In line with paragraph 7.7 of the Habitats Regulations Assessment (HRA), Natural England advise that for all of the site locations that progress as being a potentially suitable and qualify as relevant residential growth in the GIRAMS (including the existing sites which have additional capacity, and the formalisation of existing sites) will need to be formally checked and confirmed by your Authority, as the competent authority, to determine whether the Norfolk GIRAMS applies in view of the [European Site's conservation objectives](#) and in accordance with the Conservation of Habitats & Species Regulations 2017 (as amended).

The GIRAMS has been put in place to ensure that this additional recreational pressure does not lead to an adverse effect on European designated sites in Norfolk. The strategy allows effective mitigation to be implemented at a strategic level, so that the relevant councils, Natural England and

other stakeholders are able to work together to provide the best outcomes for the designated sites. It also has the benefit of streamlining the process, so reducing the amount of time taken to process individual planning applications for the councils and Natural England. Natural England worked collaboratively with all the relevant councils to set up the strategy. We fully support the aims of the strategy; in our view it is the best way to provide appropriate avoidance and mitigation measures for the European sites in question.

ii) Site allocations within Impact Risk Zones (IRZs) of Designated Sites.

Natural England concurs with the assessment made within Table 2 and Paragraph 7.7 of the HRA, that site allocations that fall within the IRZs of designated sites (and meet the criteria for triggering these IRZs), may require further assessment in relation to statutory designated sites for nature conservation via a project level HRA, should these locations progress to the planning application stage. Natural England also welcomes the precautionary approach proposed of assessing sites that 'lie just outside' of IRZs as highlighted in paragraph 7.6.

Yours sincerely

Joe Thompsett
Sustainable Development – Norfolk and Suffolk