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Our ref: 491161



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## BY EMAIL ONLY

Michael Burton  
Borough Council of King's Lynn & West Norfolk  
[planning.policy@west-norfolk.gov.uk](mailto:planning.policy@west-norfolk.gov.uk)

Dear Mr Burton

### **King's Lynn and West Norfolk Local Plan 2021-2040: Main Modifications Part 2 (Gypsy, Traveller and Travelling Showpeople) consultation (October – November 2024)**

Thank you for your consultation on the above dated 21 October 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.

#### **1) Main Modifications**

##### **MM378 - New Policies - Sites for Gypsies, Travellers and Travelling Showpeople and Caravans, Park Homes and Houseboats and their supporting text**

Natural England supports the wording within the new policy advising that a Habitats Regulations Assessment will be required for where allocated sites are within or just outside of Impact Risk Zones (IRZs). However, currently the policy only refers to impacts in accordance with GIRAMS, but there are allocated sites that could have a likely significant effect on designated sites in their own right (separate from the recreational disturbance impacts considered by GIRAMS). Therefore, we suggest the following wording for the sake of clarity with regard to point *l.* of MM378, although we note that further changes to the policy wording may not be possible given the late stage of the local plan process, so we leave the decision on whether you update this policy to your Authority.

*l.* provide a project-level Habitat Regulations Assessment (HRA) for sites either within or just outside of Impact Risk Zones (IRZ) for SSSIs that underpin European sites (i.e. SACs, SPAs and Ramsar sites), which considers the potential impact pathways of the allocated site in its own right, and the potential impacts of recreational disturbance in accordance with GIRAMS; namely, GT17, GT18, GT25, GT28, GT34, GT39, GT54, GT65 and GT66. This would also be a requirement for any windfall sites that are within or in close proximity to the boundary of an IRZ. For remaining sites that lie outside of an IRZ, but within the Zone of Influence of a designated site in accordance with GIRAMS, a project level HRA is required, which only considers likely significant effects from recreational disturbance impacts.

Noting the removal of the need for a HRA for Sites of Special Scientific Interest (SSSIs), as the HRA process only applies to European sites (Special Areas of Conservation, Special Protection Areas, and Ramsar sites), and not SSSIs. Impacts to SSSIs would need to be considered as part of an SSSI impact assessment.

#### **2) Sustainability Appraisal**

We note the conclusions set out in the Sustainability Appraisal and have no further comments to

make.

### **3) Habitats Regulations Assessment (HRA)**

Natural England concurs with the assessment made within Table 2 and Paragraph 7.7 of the HRA, that all site allocations will be required to provide a project level HRA for residential developments within the Zone of Influence for GIRAMS, and that in addition to this, those allocations that fall within the IRZs of designated sites, will require further assessment in relation to statutory designated sites for nature conservation (via the project level HRA) if they meet the criteria for triggering these IRZs.

Natural England welcomes the precautionary approach proposed of assessing sites that 'lie just outside' of IRZs as highlighted in paragraph 7.6.

### **4) Other advice**

We hope our comments are helpful. If you have any queries relating to the advice in this letter please contact me using the details provided below.

For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Natural England would be happy to provide additional advice through our Discretionary Advice Service.

Yours sincerely

Joe Thompsett  
Sustainable Development – Norfolk and Suffolk