



# WILD FRONTIER ECOLOGY

King's Lynn and West Norfolk



HRA Modifications Addendum

February 2016

Report Details	Submitted to
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The data which we have prepared and provided is accurate, and has been prepared and provided in accordance with the CIEEM's Code of Professional Conduct. We confirm that any opinions expressed are our best and professional bona fide opinions.

This report conforms to the British Standard 42020:2013 Biodiversity - Code of practice for planning and development.



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## 1. Background

The Borough Council of King's Lynn and West Norfolk submitted the Site Allocations and Development Management Policies (SADMP) for Examination in January 2015.

A Habitats Regulations Assessment (HRA), as required under the Conservation of Habitats and Species Regulations 2010 (the Habitats Regulations) was undertaken for the SADMP. This document assessed the likely impacts, effects and mitigation associated with the allocation of sites that would be required within the plan in the formal context of the Habitats Regulations.

This concluded likely significant effect for in-combination impacts on some of the Borough's European sites. By far the most important of these, in a borough-wide context, was considered to be the multi-faceted and complex impacts arising from increased recreation and leisure pressures on European sites. Sites where potential in-combination effects were identified were Roydon Common and Dersingham Bog SAC, North Norfolk Coast SPA, Wash SPA, the Wash and North Norfolk Coast SAC and Breckland SPA.

A Mitigation and Monitoring Strategy, approved by Cabinet<sup>1</sup> (, details how avoidance, mitigation and monitoring will be carried out. The monitoring and mitigation measures will be funded from a variety of sources and different bodies, including making use of existing services and funding provided by the Borough Council. Existing services provided by Natural England and other conservation organisations are also referenced where the funding is in place. Further funding is required from developers, which will be sought through a Habitat Mitigation Contribution and planning obligations (also known as Section 106 agreements), and in the future through the Community Infrastructure Levy (CIL). The prime responsibility for funding of the directly provided mitigation measures will lie with the developer.

It is proposed that the Borough Council form an advisory panel (Habitat Mitigation Advisory Panel) to assist it in making expenditure decisions on mitigating recreational impacts of new development through both Habitat Mitigation Contributions and any funding generated through CIL.

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<sup>1</sup><http://democracy.west-norfolk.gov.uk/documents/s1343/Appendix%20%20-%20HRA%20Monitoring%20and%20Mitigation%20Strategy.pdf>

## **2. Introduction**

This HRA addendum is reviewing the further modifications to the SADMP for the likely impact on European sites. The proposed modifications are largely detailed changes to existing policies and text, for example to improve clarity. There is one new policy (DM2A) and DM19 incorporates the policy approach to the issues raised in the HRA outlined above. Consequently most of the policies are unlikely to have any negative impacts on European sites (refer to Tables 1-2).

For clarity and completeness, this addendum also considers any potential effects brought about by changes in housing numbers through the examination process, which are generally small (refer to Tables 3-5).

### **3. Conclusions**

It is considered that there are unlikely to be significant negative effects on International Sites arising from the proposed modifications to the SADMP, and that Appropriate Assessment is not required. Any issues are recorded as notes within the tables.

**Table 1. Assessment of Main Modifications**

Policy, Plan or Map No	Main Modification	Likely Significant Effect	European Sites affected	Mechanism of effect	Possible features impacted	Notes
DM2 and supporting text - Development Boundaries	Amend Policy and supporting text for clarity and certainty.	No	None	None	None	
New policy DM2A	Insert new policy after Policy DM2.	No	None	None	None	Evaluate the likelihood of an Early Plan Review requiring HRA.
DM3 and supporting text - Development in Smaller Villages and Hamlets	Amend title, supporting text and policy	No	None	None	None	Project level HRA may be required in some locations
DM9 - Community Facilities	Amend Policy and add new supporting text paragraph following C.9.3	No	None	None	None	
DM10 - Retail Development	Amend title of policy and plan section, amend policy, and add new supporting text paragraph following c.10.4	No	None	None	None	
DM12 - Strategic Road Network	Clarification of policy text, and correction of alignment and continuity of routes on various insets of the Policies	No	None	None	None	

Policy, Plan or Map No	Main Modification	Likely Significant Effect	European Sites affected	Mechanism of effect	Possible features impacted	Notes
	Map.					
DM13 - Railway Trackways	Amendment of policy, and addition of further route to policy text and maps).	No	None	None	None	
DM14 - CITB Bircham Newton and RAF Marham	Amendment to policy, and additional supporting text following paragraph C.14.5	No	None	None	None	
DM15 - Environment, Design and Amenity	Additional bullet point concerning heritage	No	None	None	None	
DM16 - Provision of recreational open space for residential developments	Amended open space requirements for 20-99 house proposals.	No	None	None	None	
DM17 - Parking Provision in New Development	Amended second sentence in second paragraph of policy.	No	None	None	None	
DM18 - Coastal Flood Risk Hazard Zone	Amendment (correction) of northern boundary of zone on map, to include land between South Beach Road and Seagate Road, Hunstanton.	No	None	None	None	
DM19 - Green Infrastructure	Amendment of policy title and policy text, and additional supporting text.	No	None	None	None	Refers directly to the existing HRA, and places the agreed arrangements for the HRA Monitoring and Mitigation Strategy into the



							plan policy.
Para C.20.2-3, DM20 - Renewable Energy	Refer to additional guidance, and amendment to text and policy to clarify approach to wind energy.	No	None	None	None		
Paragraph C.21.2 and DM21 - Sites in Areas of Flood Risk	Amended policy, annexed Design Guidance, and additional supporting text.	No	None	None	None		
Paragraph D.1.4-12	Amend text and tables to include a reference to windfall sites.	No	None	None	None		
Paragraph D.1.17	Insert new paragraphs D.1.22-24 to address the Plan's approach to 'Development on Brownfield Sites'	No	None	None	None		
Policy E1.1 - King's Lynn Town Centre	Reference to addition of new policy.	No	None	None	None		
New Policy E1.2A - King's Lynn Port <i>(to follow E1.2 Town Centre Retail Expansion Area)</i>	Addition of new policy, and addition of port operational area to Policies Map.	No	None	None	None		
Policy E1.15	Amend Policy to reduce number of dwellings to be allocated for.	No	None	None	None		
Policies Map Inset E2	<ol style="list-style-type: none"> <li>1. Add site off Gravel Hill Lane ('Site F')</li> <li>2. Amended symbols for clarity and consistency with development boundaries elsewhere.</li> <li>3. Move the inset to follow, instead of precede, the Strategic Concept Diagram (Indicative)</li> </ol>	No	None	None	None		

Strategic Concept Diagram (Indicative)	1. Show on non-Ordnance survey base in order to avoid confusion with specific boundaries on Policies Map Inset E2. 2. Move to place this diagram to precede, rather than follow, Inset E2.	No	None	None	None	
E2.1 West Winch Growth Area Strategic Policy	Revision of allocation area to reflect addition of 'Site F', and additional transport related amendments to Policy.	No	None	None	None	
E2.2 Development within existing built-up areas of West Winch	Amendment to policy to .	No	None	None	None	
Policy E3.1	Clarification of policy text	No	None	None	None	Point e. Needs correcting to refer to the Habitats Regulations (rather than habitats assessment regulations)
Policy E4.1	Clarify the need for a transport assessment	No	None	None	None	Point 13 needs correcting to refer to the Habitats Regulations (rather than habitats assessment regulations)
Map Inset F1	Correct map to represent the Strategic Road Network at this location.	No	None	None	None	
Policy F1.2	Clarification on access requirements for prospective developers and decision	No	None	None	None	

	makers.					
Policy F2.3	Clarification of text to ensure the site is delivered in line with the objectives of the local authority.	No	None	None	None	
Policy F2.4	Amendments requested through representations from stakeholders.	No	None	None	None	
Policy F3.1	Amendment sought by EA.	No	None	None	None	
Map Inset G17	Replace original Burnham Market map with a revised map to show the change of the boundary of allocated site G17.1. An area has been removed which is not under ownership of the developer and was not intended to be allocated for development.	No	None	None	None	
Map Inset G25	Replace original Clenchwarton map with a revised map to show inclusion of additional land within the development boundary south of Main Road and west of Black Horse Road.	No	None	None	None	
Section G.28 Denver	Amend approach to development in Denver, and allocate site G28.1	No	None	None	None	
Map Inset G29	Replace original Dersingham map with a revised map which corrects anomalies with the development boundary adjacent to the allocated site G29.2.	No	None	None	None	

Policy G29.2	Amendment to policy to fulfil HRA requirements.	No	None	None	None	Strengthens policy as regards HRA
Policy G34.1	Amendment to policy to recognise the right of way.	No	None	None	None	
Policy G35.1 Paragraphs G.35.10-14, Inset Map G35.	Amend the site area and number of dwellings to be allocated. Amend subsequent paragraphs and Inset Map G35.	No	None	None	None	
Map Inset G35	Amend Development Boundary to north of G35.3 to reflect recent development, and amendment to site G35.1.	No	None	None	None	
Policy G35.4	Amendment to policy to include two additional requirements to address heritage issues.	No	None	None	None	
Policy G43.1	Amendment to policy to include a requirement for Ecological Study.	No	None	None	None	
Map Inset G57	Correction to Site Allocation G57.2 boundary	No	None	None	None	
Policy G59.1	Amendment to policy requirement for the Heritage Asset Statement.	No	None	None	None	
Policy G59.4	Amendment to policy requirement for the Heritage Asset Statement, and for access to the site. Also an additional requirement for highway improvements.	No	None	None	None	

Map Inset G88	Amendment to Development Boundary to north of G88.1 to include recent development. Also amendment to the shape of the Stoke Ferry Car parking symbol to match that of the one shown in the map inset legend.	No	None	None	None	
Policy G85.1	Amendment to policy to remove requirement for odour assessment, following recently updated advice.	No	None	None	None	
Policy G88.3	Amendment to policy for requirement for consideration of Conservation Area.	No	None	None	None	
Policy G93.2	Clarification of requirement of a FRA.	No	None	None	None	
Paragraph G94.1	To reflect the additional allocation in Tilney St Lawrence.	No	None	None	None	
To follow Policy G94.1	Additional allocation at Tilney St Lawrence.	No	None	None	None	
Policy G104.1	Amend dwelling numbers to reflect character and density of locality.	No	None	None	None	
Policy G104.3	Additional point to recognise the relationship of the site to the Conservation Area.	No	None	None	None	
Policy G104.4	Amendment to policy to ensure consistency throughout the document.	No	None	None	None	

Policy G113.2	Addition to policy to recognise the neighbouring heritage assets.	No	None	None	None	
Policy G114.1, paragraphs G114.5-7, and Inset Map G114	Revised Policy to reflect a revised allocation, and associated paragraphs and Inset Map.	No	None	None	None	
To follow paragraph G.123.3 - Policy G123.1	Additional allocation for Wiggshall St Germans	No	None	None	None	

**Table 2. Assessment of Minor Modifications**

Text Reference	Minor Modification	Likely Significant Effect	European Sites affected	Mechanism of effect	Possible features impacted	Notes
Introduction	Whether relationship of this plan to neighbourhood plans is sufficiently clear and highlighted.	No	None	None	None	
Paragraph C.5.2	Reference to isolated new homes, which is not relevant to the policy. (It related to an earlier iteration of the policy).	No	None	None	None	
Paragraph C.5.3	Paragraph refers to retaining a stock of smaller homes, which is not relevant to the policy. (It related to an earlier iteration of the policy).	No	None	None	None	
Paragraph C.6.2 & C.6.3	Two related sentences split between two spate paragraphs, leading to confusion/objections in reps	No	None	None	None	

Text Reference	Minor Modification	Likely Significant Effect	European Sites affected	Mechanism of effect	Possible features impacted	Notes
Paragraph C.6.6	Add new paragraph following the existing C.6.6	No	None	None	None	
Paragraph C.8.1	Presentation of 2011 CS Policy requirements has led to confusion (people have thought this policy sets those quotas). It is out of date and will likely become increasingly so.	No	None	None	None	
Paragraph C.11.4	Clarity regarding wording of supporting text (C11.4) to ensure consistency/compatibility.	No	None	None	None	
Paragraph C.11.3	Reword Policy DM11 as follows:	No	None	None	None	
Paragraph C.12.2	Reword Policy DM12 as follows:	No	None	None	None	
Paragraph C.13	Potential to add additional information and justification.	No	None	None	None	
Paragraph C.19.3	Reword as follows: Removing the struck through word	No	None	None	None	
Policy DM 21 Point 3	Add in an extra bullet point	No	None	None	None	
Policy DM21	Delete the word 'National' as it is not needed.	No	None	None	None	



Text Reference	Minor Modification	Likely Significant Effect	European Sites affected	Mechanism of effect	Possible features impacted	Notes
Paragraph C.22.3	Remove word in text	No	None	None	None	
Paragraph C.22.3	Add in a word to the policy	No	None	None	None	
Paragraph D.1.14 & D.1.17	Addition of supporting text and cross reference with Core Strategy Policy CS02 The Settlement Hierarchy.	No	None	None	None	
Paragraph E 1.1	Bullet point for infrastructure	No	None	None	None	
Paragraph E.1.12	Insert new paragraph E.1.13 entitled 'Transport' to expand the details on transport issues	No	None	None	None	



Text Reference	Minor Modification	Likely Significant Effect	European Sites affected	Mechanism of effect	Possible features impacted	Notes
Paragraph numbers in section E.1	Paragraph Numbering is absent	No	None	None	None	
Policy E2.1	Typo,	No	None	None	None	
New Paragraph after E.2.24 (re: E2.1)	In order to embed / better explain this in the policy E2.1 the following modification is proposed	No	None	None	None	
Paragraph E.2.47	Erroneous comparison of traffic on A10 and A47	No	None	None	None	
Paragraph E2.64	E2.64 heading 'Ecology'	No	None	None	None	
Paragraph E2.73	Clarification	No	None	None	None	
Paragraph E.3.7	Updating of status of Neighbourhood Plan.	No	None	None	None	

Text Reference	Minor Modification	Likely Significant Effect	European Sites affected	Mechanism of effect	Possible features impacted	Notes
Paragraph E3.12	Add new paragraph following paragraph E3.12, and to provide a consistent text / policy to housing numbers.	No	None	None	None	
Paragraph E.4.3	Replace 'in' with 'within'.	No	None	None	None	
Paragraph E.4.5	New wording for clarification.	No	None	None	None	
Paragraph E.4.11 & E.4.12	Updating of status of Neighbourhood Plan.	No	None	None	None	
Paragraph E.4.17	Removal of the word 'Coasthopper'.	No	None	None	None	
Paragraph E.4.20	Addition of words for clarity	No	None	None	None	
Paragraph E.4.22	Clarification	No	None	None	None	
Paragraph E.4.23	Deletion of words not required	No	None	None	None	
Policy E4.1	Amending of Sub-section 1	No	None	None	None	
Policy E4.1	Typo - spurious 'A' included after second paragraph	No	None	None	None	
Paragraph F.1.2	States bus service is 'extensive', which has been disputed	No	None	None	None	

Text Reference	Minor Modification	Likely Significant Effect	European Sites affected	Mechanism of effect	Possible features impacted	Notes
Policy F1.3	Erroneous formatting of policy text	No	None	None	None	
Policy F1.4	Garbled text	No	None	None	None	
Policy F1.4	Erroneous formatting renders provisions confusing.	No	None	None	None	
Policy F2.2	F2.2 part 5 refers to the 'North Norfolk Coast AONB'. This is not the correct title.	No	None	None	None	
F2.3	F2.3 part 3 refers to the 'North Norfolk Coast AONB'. This is not the correct title.	No	None	None	None	
Paragraph F.2.19	Incorrect policy reference	No	None	None	None	
Paragraph F.2.20	Paragraph F.2.20 duplicates paragraph F.2.24	No	None	None	None	
Paragraph F.2.34	Deletion of words not required	No	None	None	None	
Paragraph F.3.8	Additional bullet point	No	None	None	None	
Policy F3.1	EA representation request to add an additional point to require a FRA	No	None	None	None	
Paragraph G.13.8	Updating of status of Neighbourhood Plan.	No	None	None	None	

Text Reference	Minor Modification	Likely Significant Effect	European Sites affected	Mechanism of effect	Possible features impacted	Notes
Paragraph G22.1	Paragraph G.22.1 Line 3 - "The origin of the form of the settlement lies in the Norman Castle" not 'Castles'	No	None	None	None	
Paragraph G.22.6	Confusion was expressed as the text refers to both 11 and 15 dwellings with no explanation for the increased number.	No	None	None	None	
Paragraph G.22.7	The text states that the site is undeveloped and not currently in agricultural production but this is incorrect. There are three derelict properties and gardens on the site and the remainder of the site is in agricultural production	No	None	None	None	
Paragraph G29.12 & G29.15	Refers to Grade I listed Church of St. Mary, should be St. Nicholas	No	None	None	None	
Paragraph in G34.1 section	In the Site Justification section, first paragraph the last sentence reads: 'Development of this site is supported by Emneth Parish Council.'	No	None	None	None	
Paragraphing in G34 section	In the Site Justification section the paragraph numbering is absent	No	None	None	None	

Text Reference	Minor Modification	Likely Significant Effect	European Sites affected	Mechanism of effect	Possible features impacted	Notes
Paragraph G35.5	Replace paragraph	No	None	None	None	
Map Inset G36 Fincham	The map inset appears smaller than others in the document	No	None	None	None	
Paragraph G.42.2	Text correction .School is not operational, Post office has closed, no bus service	No	None	None	None	
Paragraph numbering in section G42	In the Site Justification section the paragraph numbering is absent	No	None	None	None	
Paragraph G.48.6	Incorrect tense used	No	None	None	None	
Policy G56.1	The policy title formatting is inconsistent with those in the rest of the document	No	None	None	None	
Paragraph G56.7	Incorrect character present	No	None	None	None	
Paragraph G57.7	Missing “”	No	None	None	None	
Paragraph G57.10	Incorrect tense used	No	None	None	None	
Paragraph G.88.2	A surgery is listed as a service/facility within the settlement and there is not one.	No	None	None	None	

Text Reference	Minor Modification	Likely Significant Effect	European Sites affected	Mechanism of effect	Possible features impacted	Notes
Paragraph G.88.18	Numerical error	No	None	None	None	
Policy G.93.2	Omission of text: point 3 of the policy should read 'as local highway authority' not 'as local highway'.	No	None	None	None	
Paragraph numbering in section G94	In the Site Justification section the paragraph numbering is absent	No	None	None	None	
Paragraph G.95.1	Text is inaccurate. The text states that the village has 2 pubs, but it has 3 and states that the village has a G.P Surgery but it does not.	No	None	None	None	
Paragraph numbering in section G96	Paragraph Numbering is absent	No	None	None	None	
Policy G104.1	The policy title appears to be a larger text size than others within the document	No	None	None	None	
Policy 104.5	Policy title formatting is inconsistent with other in the document and therefore not easily identifiable on the map inset	No	None	None	None	
Policy 104.6	Policy title formatting is inconsistent with other in the document and therefore not easily identifiable on the map inset	No	None	None	None	

Text Reference	Minor Modification	Likely Significant Effect	European Sites affected	Mechanism of effect	Possible features impacted	Notes
Map Inset G113 Welney	The map inset appears smaller than others in the document	No	None	None	None	
Paragraph G113.6	The site description and justification was not clear in that the two parts of the site could come forward independently providing they do not inhibit one another.	No	None	None	None	
Paragraph Numbering in section G120	Paragraph Numbering is absent	No	None	None	None	
Policy G.120.2 West Walton/Walton Highway	Text is inaccurate. Text should read: 'land amounting to 0.54 hectares north of School Road' not 'land amounting to 0.54 hectares north of Salts Road'	No	None	None	None	
Paragraph Numbering in section G.126	Paragraph numbers are absent for this settlement chapter of the document	No	None	None	None	
GLOSSARY	Addition to definition of 'Brownfield Land or Sites'	No	None	None	None	
GLOSSARY	Glossary page 420 'out of centre' incorrect/meaningless- delete last word 'centre' and insert 'existing urban area'	No	None	None	None	

Text Reference	Minor Modification	Likely Significant Effect	European Sites affected	Mechanism of effect	Possible features impacted	Notes
GLOSSARY	Include definition for 'Rural Affordable Housing Exceptions Sites'	No	None	None	None	
GLOSSARY	Amend definition for 'Transport Assessment'	No	None	None	None	
GLOSSARY	Provide a consistent definition of windfall	No	None	None	None	
Appendix 5	No statistical data for Emneth	No	None	None	None	
Table: Distribution of development between settlements in the Rural Area	Errors in percentages in table - Castle Acre, Welney, Emneth, Total.	No	None	None	None	
Table: Distribution of development between settlements in the Rural Area	Second column (a) describes the allocations as provisional	No	None	None	None	
Distribution of Development, Smaller Villages and Hamlets	To ensure consistency with the revisions to Policy DM3.	No	None	None	None	
Annex 4 Flood Risk Protocol	Insert a new Annex following Annex 4, 'Annex 5: Flood Risk Design Guidance'	No	None	None	None	



**Table 3. Housing Number Alterations**

Settlement	Site Allocations and Development Management Policies - Proposed Submission Document	Modified figures	Change +/-
King's Lynn Town Centre	1,450	1,257	-193
West Lynn	249	169	-80
South Wootton	300	300	No change
Knight's Hill	600	600	No change
West Winch	1,600	1,600	No change
Downham Market	390	390	No change
Hunstanton	333	333	No change
Wisbech	550	550	No change
<b>Total</b>	<b>5,472</b>	<b>5,199</b>	<b>-273</b>

**Table 4. Key Rural Service Centres**

Key Rural Service Centres	Submission Version	Modified figures	Change +/-
Brancaster with Brancaster Staithe and Burnham Deepdale	15	15	No change
Burnham Market	32	32	No change
Castle Acre	11	15	+4
Clenchwarton	50	50	No change
Dersingham	30	30	No change
Docking	20	20	No change
East Rudham	10	10	No change
Emneth	36	36	No change
Feltwell	70	105	+35
Gayton with Grimston and Pott Row	46	46	No change
Great Massingham	12	12	No change
Heacham	66	66	No change
Marham	50	50	No change
Methwold and Northwold	45	45	No change
Snettisham	34	34	No change
Stoke Ferry	27	27	No change
Terrington St Clement	62	62	No change
Terrington St John with St John Highway and Tilney St Lawrence	35	75	+40
Upwell with Outwell	80	70	-10
Watlington	32	32	No change
West Walton with Walton Highway	20	20	No change
<b>Total</b>	<b>783</b>	<b>852</b>	<b>+69</b>

**Table 5. Rural Villages**

Rural Villages	Submission Version	Modified figures	Change +/-
Ashwicken	0	0	No change
Burnham Overy Staithe	0	0	No change
Castle Rising	0	0	No change
Denver	0	8	+8
East Winch	10	10	No change
Fincham	10	5	-5
Flitcham	0	0	No change
Great Bircham with Bircham Tofts	10	10	No change
Harpley	5	5	No change
Hilgay	12	12	No change
Hillington	5	5	No change
Ingoldisthorpe	10	10	+2
Marshland St James with St Johns Fen End	25	25	+10
Middleton	15	15	No change
Old Hunstanton	0	0	No change
Runton Holme	10	10	No change
Sedgeford	10	10	No change
Shouldham	10	10	No change
Southery	15	15	No change
Syderstone	5	5	No change
Ten Mile Bank	5	5	No change
Thornham	0	5	+5
Three Holes	5	0	-5
Tilney All Saints	5	5	No change

Walpole Cross Keys	0	0	No change
Walpole Highway	10	10	No change
Walpole St Peter with Walpole St Andrew and Walpole Marsh	20	20	No change
Welney	22	20	-2
Wereham	8	8	No change
West Newton	0	0	No change
Wiggenhall St Germans	0	5	+5
Wiggenhall St Mary Magdalen	10	10	No change
Wimbotsham	0	0	No change
Wormegay	0	0	No change
Total	232	243	+9

### Assessment of Housing Changes

The changes in the numbers of housing, and the overall distribution across the Borough, from submission to post-examination are small, and are **not** considered to give rise to likely significant effect. Furthermore, the HRA Mitigation Strategy (see section 9.4 of the HRA, and the Strategy document) allows for a levy of £50 per house which would be applied to all development through the Borough.