

Planning application - FUL/2024/0001

All comments below relate predominantly to specific appendices within chapter 14 of the Environmental Statement. In addition, comments that relate to climate impacts are drawn out from the Sustainable Transport Strategy and the Transport Assessment, consolidating comments are pulled together at the close.

Chapter 14: Climate – Greenhouse Gases and Climate Resilience

Appendix 1: Climate Resilience

An overall evaluation has been done based on a desk study using UKCP18 modelled projections. As outlined in 'Table 6.1 - Assessment of significance of effects from climate change during the construction and operation phase...' all potential climate hazards are deemed 'not significant' therefore no additional mitigation measures are required beyond those already outlined within the scheme. This response would seem feasible within the assessment undertaken.

Appendix 2 Sustainability Statement

This document synthesises the spread of environmental documents submitted. Specific responses to each section are covered elsewhere in this response.

Statement observations:

- Table 2.1 'Air Quality' erroneously references 'North Norfolk District Council Air Quality Annual Status Report 2020' instead of presumably 'The Borough Council of King's Lynn & West Norfolk 2023 Air Quality Annual Status Report (ASR)'.
- Section 4.4 – Biodiversity – reference to that the '*Proposed Scheme has the potential to have adverse impacts*' on habitats within the scheme boundary and will therefore '*will not achieve a quantitative 10% biodiversity net gain*';
- Section 4.6 – Carbon & Energy Reduction – see comments below relating to Appendix 3
- Section 4.7 – Climate Resilience – See comment below for Section 4.14
- Section 4.8 – Health & Well-being - see comments relating to the Sustainable Transport Strategy (STS) below;
- Section 4.12 – Sustainable Transport – see comments relating to STS below;
- Section 4.13 – Waste – it is noted that there is the potential for a significant proportion of waste produced (36%) through the construction process, that - '*has a potential to be landfilled*'.
- Section 4.14 – Water: Flood Risk Assessment – flooding is a climate resilience issue particularly in light of increased levels of rainfall due to severe weather events, however, it is duly noted that given the area is in a predominantly flood zone 1 (low risk), and with the levels of SuDs measures proposed, this will not become an issue, notwithstanding the increased level of impermeable surface created through the scheme, and future housing development.

- Reference in conclusion to adherence to North Norfolk's Local Plan, rather than that for the Borough of KLWN.

Appendix 3 Carbon Management Plan

From a quantitative perspective, it is to be commended that the construction scheme will follow PAS:2080 insofar as identifying and addressing the carbon emissions produced by the scheme, and having a carbon target that frames the scheme. Which though has not been set at this stage, though a range has been proposed (20-30%). However, there is no overlooking the level of emissions produced during the construction process, and the significant emissions (55%) produced by end users over the life of the scheme. This would seem to contradict the statement at section 1.1.6 of this Plan: *'The purpose of the carbon management process is to manage and reduce Greenhouse Gas (GHG) emissions'*.

While a number of mitigation measures are proposed in the Carbon Management Opportunities Plan, there remains doubt about their effectiveness given the levels of caveats fielded within the Risk Register, especially those identified as 'high risk'. Included amongst these of concern, are:

- *uncertainties around achieving obligatory Biodiversity Net Gain target – this is also confirmed in section 5.1.3 Chapter 8: Biodiversity Annex 8.17: Biodiversity Net Gain Assessment (2023);*
- *conflicting priorities flagged around road use between NH and NCC, which could lead to increased traffic (and carbon emissions);*
- *Unclear how net zero will be worked towards, given the policy commitments in the LTP.*
- *land acquisition uncertainties (leading to potential increases in cost), which is suggested, could lead to future low carbon initiatives being shelved.*

In the Plan, it is to be commended that a systematic approach to meet the PAS2080 standard is covered in some detail, however, this focuses on the construction impacts only, which as far as emissions are concerned, are identified as the minority. Where it looks beyond this, there is little to see to address longer-term emissions, generated as a result of the use of the scheme.

West Winch Housing Access Road Outline Business Environmental Management Plan: Annex B: Environmental Aspects and Impacts Register

Not sure why this is included as there are no entries in the table. However, given the number of documents submitted relating to 'Environmental Aspects' where there clearly is data, there should be an evaluation of impacts – positive and negative.

Sustainable Transport Strategy (STS)

From a policy perspective, the STS clearly outlines the range of key outputs relating to infrastructure to support more active and healthy modes of transport, thereby providing safer and accessible links to King's Lynn. This will dovetail with the work flagged within the Local Cycling & Walking Infrastructure Plan (LCWIP) – with the West Winch 'future corridor' featuring.

It is commendable that key commitments of the government's 'Transport Decarbonisation Plan 2021' – namely – improvements focused on cycling and walking; the adoption of zero emission buses, with the phase-out of non-zero emission coaches; in addition to working with the freight and logistics sector, are at the heart of the support for sustainable transport for this scheme, and more broadly across the county.

It is noted that the STS recognises the importance of the Bus Service Improvement Plan - 2021 (BSIP) and the need to ensure that rural communities are better served with public transport connectivity, for existing and new customers.

What is less clear, more locally, is how this scheme will contribute and benefit from the work that will result from the STARS scheme in southern King's Lynn.

Transport Assessment (TA)

The TA quotes (section 12.1.4) DfT Circular 01/22 which states that *'New development should be facilitating a reduction in the need to travel by private car and focused on locations that are or can be made sustainable. In this regard, recent research on the location of development found that walking times between new homes and a range of key amenities regularly exceeded 30 minutes, reinforcing car dependency'*. The TA goes on to say that the Proposed WWHAR Scheme *'helps to unlock and enable delivery of strategic housing growth at West Winch which is a sustainable location for growth because it is located within a 30 minute walking and cycling catchment of the majority of jobs across the district – a high concentration of which are located on the south east edge of King's Lynn'*.

While in theory this may be the case, and would presumably only relate to the northern part of the future development (for walking), where improved connections would make this possible. In contrast, elsewhere in the TA it highlights the existing patterns of travel behaviour where there are already high levels of internal commuting by car in King's Lynn, where car dependency persists.

Conclusion

Firstly, in a number of supporting documents within the proposal there are statements that indicate this scheme is not going to meet Biodiversity Net Gain obligations. To achieve 10% BNG onsite, it will therefore, be necessary to secure offsite habitat creation of a further 96.05 area biodiversity units, and this is flagged as a risk in the Risk Register.

From a climate resilience perspective, the scheme demonstrates that there is unlikely to be significant impact resulting from this scheme, and subsequent housing development, with necessary mitigation measures being adopted, such as SuDs. However, on a wider environmental/climate stance, the scheme would seem to be inconsistent on a number of policy points, including meeting longer term local and county-wide Net Zero ambitions.

The proposal acknowledges that there will be significant emissions generated over the life of the scheme. This would seem to support evidence <http://www.transportfornewhomes.org.uk/> that satellite urban extensions (which this proposal will service) reinforces car dependency to the detriment of sustainable transport alternatives. There is already significant car dependency within King's Lynn – 76% of internal commuting journeys (another 8% as passengers) (ref: WWHAR Transport Assessment). While infrastructure improvements to support sustainable transport are rightly highlighted, there aren't clear links as to how these will work to counteract the growth in projected emissions from vehicular transport over the life of the scheme, which rather reinforces the points made in the link above.

In addition, there are acknowledged cost uncertainties flagged that could add to the burden of future emissions generated. Also, there is no clarity around mitigating the predicted levels of emissions from wider development to enable progress towards, achieving carbon neutrality, in line with Policy 6 of the County's *Local Transport Plan 4 (LTP4)*:

'... We will seek that any carbon impacts are monitored and offset by locally applicable measures. As part of our ongoing work on developing guidance for how we will deal with new development. We will amongst other things consider how to establish carbon plans and budgets and devise methodologies to achieve carbon neutrality.'

Given that a Carbon Management Plan was submitted for this scheme, it would be useful to see what work around 'methodologies' had been done to model the impacts of any mitigation measures of this scheme to bring it in line with carbon neutrality, as stated above, thereby showing its contribution to meet with the government's 2050 target; or assisting the Borough of KLWN's stated

aims to meet their declared climate emergency commitments (Climate Policy - 2021); or LTP4's support for the NCC Environmental Policy climate target (work towards 'carbon neutrality' by 2030).