



Norfolk County Council

Kings Lynn Transport Strategy Update

Information to Inform a Habitats Regulations Assessment: Stage 1 - Screening



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1 Introduction

1.1 Background

- 1.1.1 The King's Lynn Transport Strategy (the 'Strategy') sets out the transport vision for King's Lynn and the surrounding area. It highlights the challenges and opportunities along with the transport infrastructure that needs to be delivered within the short and medium-term to enable growth to come forward sustainably as well as supporting the existing local communities.
- 1.1.2 The Strategy looks at transport to 2035 with the area focus on King's Lynn urban area, North Lynn, South Lynn, West Winch, Gaywood, North Wootton, South Wootton. An Implementation Plan is also included which contains a list of possible projects that could support the objectives in the Strategy if funding becomes available.
- 1.1.3 The previous strategy was adopted by both Norfolk County Council (NCC) and the Borough Council of King's Lynn and West Norfolk (BCKLWN) in spring 2020. Since the adoption of the current King's Lynn Transport Strategy there have been a number of developments, both locally and nationally, that need to be taken account of in the updated King's Lynn Transport Strategy.
- 1.1.4 The Strategy is being updated to reflect changes in national and local transport policy that have occurred since 2020. These changes include the impact of the pandemic and the development of the King's Lynn Local Cycling and Walking Infrastructure Plan (LCWIP) adopted by both Norfolk County Council (NCC) and Borough Council of King's Lynn and West Norfolk (BCKLWN) in 2022.
- 1.1.5 WSP was commissioned to undertake a Habitats Regulations Assessment (HRA) of the Strategy to determine whether any of its constituent policies would affect sites designated and protected by the Conservation of Habitats and Species Regulations 2017 (as amended;



the 'Habitats Regulations'). This is concurrent with NCC and BCKLWN's responsibilities under the Habitats Regulations. The Strategy can be found in full in Appendix A.

1.2 Purpose of this Report

1.2.1 This report presents information to support a Habitats Regulations Assessment (HRA) screening. The need to complete HRA for the Strategy arises from its status as a strategic planning document and hence the requirements of Regulations 105, 107, 109, and 110 of the Conservation of Habitats and Species Regulations 2017 ('the Habitats Regulations') apply to it. It is submitted with the planning application to provide the competent authority with the information it needs to inform an assessment of Likely Significant Effects (LSEs) associated with the Strategy on National Site Network¹ (NSN) sites. The competent authority may consent the Strategy only after having ascertained that it will not lead to LSEs, and that it will not adversely affect the integrity of NSN Sites.

¹ Defra (2021). Changes to the Habitats Regulations 2017. Available online: <https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017>



2 Description of the Kings Lynn Strategy and its Policies

2.1 Overview

- 2.1.1 The KLTS has been developed by NCC in partnership with BCKLWN, and covers the King's Lynn town, and surrounding settlements. King's Lynn has a population of roughly 48,800 and West Norfolk, including King's Lynn, has an estimate population of 143,500.
- 2.1.2 King's Lynn is connected to the cities of Norwich and Peterborough via the A47, to Cambridge by the A10, and to Spalding and northern destinations through the A17. Access to northern and eastern Norfolk is provided by the A148 and A149 routes.
- 2.1.3 King's Lynn railway station is the only railway station located in King's Lynn. It offers scheduled train services to Cambridge and London King's Cross.

2.2 Objectives and Policies

- 2.2.1 The King's Lynn Transport Strategy and its accompanying Implementation Plan will focus predominantly on short- to medium-term objectives spanning the next five to ten years, through to 2035. Additionally, the strategy will outline several long-term ambitions for the development of King's Lynn's transport network beyond 2035.
- 2.2.2 The strategy also encompasses transport interventions designed to establish connections with other important locations. For instance, this includes linking the built-up areas of King's Lynn to other settlements within the Borough, such as Downham Market and Hunstanton, as well as to significant locations outside the Borough.
- 2.2.3 An overall 'Vision' has led to development of Objectives and Targets (hereafter referred to simply as 'Objectives'). Leading on from these, clear Policies have been defined along with actions to implement them. These comprise the Proposed Strategy, reflecting the progress made to



date and the further action needed to better the transport network in King's Lynn.

- 2.2.4 This strategy considers the seven King's Lynn Transport Strategy Objectives that deliver the Vision and sets out how the policies relate to each Objective. The Objectives and Policies are presented below alongside proposed measures to achieve them, and specific actions to be undertaken are presented in Table 2-1 below.

2.3 Referenced Transport Projects

- 2.3.1 A list of transport projects has been accumulated which are referenced within the Strategy but would not result directly from its Objectives, and implementation of its Policies through the Actions it defines. Many are defined by policies of the wider Local Transport Plan for the County of Norfolk². Some are in progress, and some would be advanced when funding becomes available subject to stakeholder engagement and consultation. The list is not exhaustive, and additional transport projects may be implemented as opportunities, funding, and requirements develop. The list has been included to provide the wider policy context in Norfolk in which the Strategy sits and assess whether they are material to the implementation of Strategy Objectives, Policies and associated Actions. The projects are set out below in Appendix A.

² Norfolk County Council (2022). Local Transport Plan 4: 2021-2036. Available at: <https://www.norfolk.gov.uk/39074>

Table 2-1 – Strategy objectives and policies, with concurrent proposed implementation actions

Objective	Target	Policy	Actions
Objective 1 Growth: Support the delivery of planned housing growth and development in the Borough	Target 1 Growth: Secure transport network improvements as part of new housing and employment sites	Policy 1 Supporting Growth and New Development: Norfolk County Council will work in partnership, including with developers, to ensure transport measures, including sustainable transport options, support new housing developments and employment sites.	Policy 1 Actions: Work with partners to inform decisions about new development to ensure they are well connected with sustainable and active transport options Seek to mitigate any adverse effects of new development on the transport network Ensure there is the necessary infrastructure to support the transition to a clean transport network
Objective 2 Connectivity: Enhance connectivity and accessibility for all within King's Lynn	Target 2 Connectivity: Secure future improvements to the Strategic Road and Rail Network and at	Policy 2 Strategic Connections: Norfolk County Council, working in partnership, seek to improve strategic connections between King's Lynn, the port, the surrounding villages, Norwich, Norfolk and the wider region. We will seek improvements to	Policy 2 Actions: Develop local transport projects in the Norfolk Strategic Infrastructure Delivery Plan Plan accessibility as part of service delivery, considering how people will

Objective	Target	Policy	Actions
	key gateway junctions	<p>strategic connections including the A47, A149 and key roundabouts like the A17/A47 Pullover junction, the town centre gyratory as well as rail and bus connections.</p> <p>Policy 3 Parking: Norfolk County Council will work with the BCKLWN to deliver the Parking Strategy that balances the needs of the town with supporting the promotion of public transport and active travel. We will seek improvements that acknowledge the importance of the NCC Electric Vehicles Strategy with regards to EV parking provision.</p>	<p>be able to access facilities and key services during planning stage making them suitable for all users including people with disabilities or restricted mobility</p> <p>Make the case for investment to the rail network and Strategic Road Network (A47), which the county council does not manage or maintain, to seek improvements, seeking quick, reliable journey times for longer-distance journeys where there is the highest need</p> <p>Policy 3 Actions:</p> <p>Consider transport interventions that improve access to the King's Lynn Enterprise Park</p> <p>Work in partnership with organisations including National Highways, Network Rail and Transport East</p>



Objective	Target	Policy	Actions
Objective 3 Public Transport: Promote greater use of public transport in King's Lynn	Target 3 Public transport: Grow annual bus and rail patronage	<p>Policy 4 Bus Services: Norfolk County Council will support bus operators to deliver quicker, reliable, integrated, convenient and accessible journeys.</p> <p>Policy 5 Rail: Norfolk County Council will work with partners to make improvements to King's Lynn Railway Station as set out in the Norfolk Rail Prospectus. We will seek improvements to the line for both the passengers and freight. This will include aiming to make them more reliable, accessible, integrated and provide faster more frequent journeys.</p>	<p>Policy 4 Actions:</p> <p>Deliver Bus Service Improvement Plan (BSIP) projects to achieve its key outcomes including increased patronage and accessibility in rural areas</p> <p>Policy 5 Actions:</p> <p>Engage with Rail operators and Network Rail/Great British Railways to ensure services, stations and changes to services are meeting the needs of local people</p>

Objective	Target	Policy	Actions
Objective 4 Active Travel: Improve the active travel infrastructure to create the right conditions to make it first choice for shorter journeys	Target 4 Active travel: Increase in the number of people walking, wheeling and cycling as monitored as part of the King's Lynn Local Cycling and Walking Infrastructure Plan	Policy 6 Active Travel: Norfolk County Council will work with partners to support and promote the use and benefits of active and sustainable modes of travel, including supporting schemes in the King's Lynn Local Cycling and Walking Infrastructure Plans to reduce dependency on cars.	Policy 6 Actions: Deliver the schemes in the King's Lynn Local Cycling and Walking Infrastructure Plan (LCWIP) Reprioritise space, especially within urban areas, and give priority to walking, cycling and public transport, leading to more sustainable travel
Objective 5 Environment: Improve local air quality and King's Lynn's natural environment and reduce overall transport emissions	Target 5 Environment: Reduce the current number of, and ensure no new, Air Quality	Policy 7 Climate Change Resilience: Norfolk County Council, working with stakeholders and partners, will contribute to making the transport network zero emission by 2050 and resilient to the impacts of severe weather and climate change.	Policy 7 and 8 Actions: Railway Road: Monitoring of air quality originally found raised concentrations of NO ₂ over the annual mean objective (40ug/m ³) in the Town Centre along Railway Road

Objective	Target	Policy	Actions
	Management Areas (AQMA)	Policy 8 Improved Air Quality: Norfolk County Council, working with partners, will seek to reduce emissions from vehicles to improve air quality.	(A148). The road network within this location suffers from poor air dispersion owing to a street canyon type effect, with properties situated close to the road and slow-moving traffic. After further assessment in 2005 this was altered to include properties along the A148 (London Rd) extending down to the South Gate as well as including properties in the Town Centre's gyratory system
Objective 6 Safety: Improve road safety in King's Lynn	Target 6 Safety: Reduce collision numbers from current levels	Policy 9 Road Traffic Harm Reduction: Norfolk County Council, working with partners, will endeavour to reduce road traffic collisions and casualty numbers through the safe systems approach. Improvement schemes will aim to address the fear of road traffic affecting vulnerable road users.	Policy 9 Actions: Use the safe system approach to understand the safety in the network and utilise this framework to identify pillars that require improvement, prioritising areas with higher number of people killed and seriously injured on the road network.

Objective	Target	Policy	Actions
Objective 7 Culture and Heritage: Protect and enhance King's Lynn's heritage and cultural environment through place-making	Target 7 Culture and heritage: Number of transport projects with heritage considered as part of delivery.	Policy 10 Supporting Culture, Heritage and Tourism: Norfolk County Council, working with partners, where possible will seek to protect existing green infrastructure and enhance the public realm for the benefit of residents, visitors and tourists using a healthy streets approach to make streets attractive and work for all users of the network.	<p>Policy 10 Actions:</p> <p>Improve the quality of place through conserving and enhancing the built environment when transport schemes are implemented</p> <p>Work with cultural organisations in King's Lynn to ensure schemes are sympathetic to cultural heritage in the area</p> <p>Take into account the ten year Cultural and Heritage Strategy for King's Lynn when making design decisions in the town</p> <p>Make existing settlements and transport infrastructure more attractive, ensuring they complement King's Lynn's historic character.</p>



3 Assessment Methodology

3.1 Legislative and Planning Policy Context

Habitats Regulations Assessment

- 3.1.1 The Conservation of Habitats and Species Regulations 2017 (as amended, hereafter referred to as the Habitats Regulations) protects a national network of sites within the UK consisting of Special Areas of Conservation ('SAC'; focussed on intrinsically important habitats and biological populations other than birds) and Special Protection Areas ('SPA'; focussed on protecting important bird populations and the habitats that support them). This is the NSN, termed the Natura 2000 network prior to the UK's departure from the European Union, supports and forms part of a wider network of sites within Europe.
- 3.1.2 Maintaining a coherent network of protected sites with overarching conservation objectives is still required to:
- fulfil the commitment made by government to maintain environmental protections; and
 - continue to meet our international legal obligations, such as the Bern Convention, the Oslo and Paris (OSPAR) Conventions, Bonn and Ramsar Conventions.
- 3.1.3 Regulation 63 (1) of the Habitats Regulations states that '*A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which—*
- (a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and*
- (b) is not directly connected with or necessary to the management of that site,*



—must make an Appropriate Assessment of the implications for that site in view of that site’s conservation objective”.

- 3.1.4 Where effects on a habitats site are likely to be significant, they must be subject to the second stage of the HRA process, Appropriate Assessment. Conservation of Habitats and Species Regulations 2017 (as amended) also make allowance for projects or plans to be completed if they satisfy ‘imperative reasons of overriding public interest (IROPI)’³. Regulations 64 and 68 cover such situations.
- 3.1.5 Although the UK has now left the European Union, Court of Justice of the European Union (CJEU) decisions issued prior to 1st January 2021 remain binding until subsequent UK court decisions overrule them. Further to the case of *Harris v Environment Agency*, it is clear that article 6(2) of the Habitats Directive still continues to take effect.

National Planning Policy Framework 2024 (NPPF)

- 3.1.6 The NPPF (originally published in 2021, and last updated significantly in 2024) sets out the Government’s planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other development (for the purposes of this assessment the Proposed Scheme is considered to be a development) can be produced. It must be considered in preparing the development plan and is a material consideration in planning decisions.
- 3.1.7 The NPPF (at para 179) states that when considering the conservation and enhancement of the natural environment, with regard to habitats and biodiversity, the Local Planning Authority should:

“...protect and enhance biodiversity and geodiversity, plans should:

³ ‘(a) reasons relating to human health, public safety or beneficial consequences of primary importance to the environment; or
(b) any other reasons which the competent authority, having due regard to the opinion of the European Commission, consider to be imperative reasons of overriding public interest.’



Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity”.

3.1.8 Para 181 to 182 of the NPPF states: The following should be given the same protection as habitats sites:

181:

- a) *“potential Special Protection Areas and possible Special Areas of Conservation;*
- b) *listed or proposed Ramsar sites; and*
- c) *sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites”.*

182: *“The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site”.*

Relevant Case Law and Legal Opinion

People over Wind, Peter Sweetman v Coillte Teoranta (Case C-323/17)

3.1.9 The “People over Wind” judgment ruled that any measures added to achieve the purpose of avoiding or reducing harmful effects on a



Habitats Site(s) should not be considered at the screening stage. The Competent Authority can only consider such mitigation measures as part of an appropriate assessment.

3.1.10 The key part of the judgment is summarised in Paragraph 40 as “in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site”.

3.1.11 UK Government guidance (‘Habitats Regulations Assessments: protecting a European Site’, December 2023) clarifies that measures which have been specifically added to achieve the purpose of avoiding or reducing its harmful effects on a habitats site should not be considered at the screening stage. However, features that are integral to the design or physical characteristics of the project that is being assessed, for example, the layout, timing and location of a scheme, may be considered at the screening stage.

3.1.12 In accordance with UK government guidance on the application of the People over Wind ruling, this HRA has, where applicable, only considered avoidance or mitigation measures, specifically added to avoid or reduce harmful effects on a Habitats Site(s), during the appropriate assessment stage.

Coöperatie Mobilisation for the Environment and Vereniging Leefmilieu v College van gedeputeerde staten van Limburg and College van gedeputeerde staten van Gelderland (Cases C-293/17 and C-294/17)

3.1.13 The “Dutch Nitrogen” cases established that: (Paragraph 126) “...it is only when it is sufficiently certain that a measure will make an effective contribution to avoiding harm to the integrity of the site concerned, by guaranteeing beyond all reasonable doubt that the plan or project at



issue will not adversely affect the integrity of that site, that such a measure may be taken into consideration in the 'appropriate assessment...' and (Paragraph 130) "The appropriate assessment of the implications of a plan or project for the sites concerned is not to take into account the future benefits of such 'measures' if those benefits are uncertain, *inter alia* because the procedures needed to accomplish them have not yet been carried out or because the level of scientific knowledge does not allow them to be identified or quantified with certainty".

Compton Parish Council, Julian Cranwell and Ockham Parish Council v Guildford Borough Council, SoS for Housing, Communities and Local Government (2019), High Court of Justice, EWHC 3242 (Admin) CO/2173,2174,2175/2019

3.1.14 In the Compton case, the Court ruled in relation to exceedances of nitrogen deposition critical loads and NOx emissions, that, in arriving at a conclusion during appropriate assessment, that this: 'could not be answered, one way or the other, by simply considering whether there were exceedances of critical loads or levels, albeit rather lower than currently. What was required was an assessment of the significance of the exceedances for the SPA birds and their habitats...'. The HRA for the revised Ports NPS has, in accordance with the Compton ruling, considered the effects of likely impacts to the extent that the Competent Authority is able to be certain that there would be no adverse impacts on the integrity of Habitats Sites rather than relying on threshold values as a determinant.

3.2 Stages of Habitats Regulations Assessment

3.2.1 UK Government guidance⁴ sets out the process of HRA. Existing guidance on the assessment of effects of plans or projects on Natura 2000 sites (now Habitats Sites in the UK) issued by the European

⁴ Defra (2023) Habitats regulations assessments: protecting a European site. Available: <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>; accessed 8 April 2024



Commission⁵ has also been used by this assessment. This document sets out the step-wise approach which should be followed to enable competent authorities to discharge their duties under the Habitats Regulations. The process used is usually summarised in four distinct stages of assessment which are described below and shown in the chart overleaf.

- **Screening (Stage 1):** the process to identify the likely effects of a plan or project upon the qualifying features and conservation objectives of a Habitats Sites, either alone or in combination with other plans or projects and consider whether there will be an LSE.
- **Appropriate Assessment (Stage 2):** detailed consideration of LSEs and whether they would lead to significant adverse effects on the integrity of the Habitats Sites, either alone or in combination with other plans and projects. Where there are adverse effects, mitigation is considered to offset them. Consent may only be granted at this stage if the Appropriate Assessment can conclude beyond reasonable scientific doubt that the plan or project will not have adverse effects (alone or in-combination with other plans or projects). If the mitigation options cannot avoid adverse effects, then development consent can only be given if Stages 3 and 4 are followed.
- **Assessment of Alternative Solutions (Stage 3):** the process which examines alternative ways of achieving the objectives of the plan or project that avoid or have lesser adverse effects on the integrity of the Habitats Sites.

3.2.2 The method for assessing the likely significance of an effect is based on the potential for impacts arising from the Proposed Scheme, both alone and in-combination with other plans and projects, to undermine

⁵ European Commission (2018) Managing Natura 2000 Sites: the provisions of Article 6 of the Habitats Directive 92/43/CEE. Brussels: European Commission.



the Conservation Objectives of relevant Habitats Sites. There is no specific definition of what constitutes a LSE, but case law (CJEU C-127/02⁶) clarified that in the context of an HRA, an LSE is one whose occurrence cannot be excluded based on objective information.

3.3 Screening (Stage 1) Methodology

- 3.3.1 An initial broad screening of NSN Sites to investigate the potential for effect pathways linking them the Proposed Scheme has been undertaken and is referred to as 'screening'. The screening process was wide-ranging and took into consideration the sensitivity and mobility of NSN Site Qualifying Features, e.g. marine mammal and bat species, as well as the nature of the proposed works and working methods.
- 3.3.2 Where assessment of plans and strategies is being undertaken it is important to scope out elements which do not relate to physical changes through development, and as such by their definition will not lead to LSEs by their definition. This approach is in line with Section F.6 of the Habitats Regulations Assessment Handbook (DTA, 2022), a method that is in general use at the time of writing. This will assign objectives and their constituent policies and targets to one of the following categories:
- A. General statement of policy / general aspiration (no LSE predicted).
 - B. Policy listing general criteria for testing the acceptability / sustainability of proposals (no LSE predicted).
 - C. Proposal / policy referred to but not proposed by the Strategy (no LSE predicted).
 - D. General plan-wide environmental protection / site safeguarding / threshold policies (no LSE predicted).
 - E. Policies which steer change in such a way as to protect NSN Sites from adverse effects (no LSE predicted).

⁶ CJEU - C-370/12 / Judgment Thomas Pringle v Government of Ireland and Others.



- F. Policy that cannot lead to development or other change (no LSE predicted).
 - G. Policy that could not could not have any conceivable effect on a NSN Site (no LSE predicted).
 - H. Policy which could not lead to effects which could undermine the conservation objectives of any NSN Site, either alone or in-combination with other plans or projects (no LSE predicted).
 - I. Policy or proposal which may have a likely significant effect on NSN Sites alone (LSE predicted).
 - J. Policy which may have an effect on NSN Sites, but is unlikely to be significant alone, so needs to be checked for in-combination effects (LSE possible pending in-combination assessment).
 - K. Policy unlikely to have a significant effect either alone or in-combination (no LSE predicted after in-combination HRA screening assessment completed).
 - L. Policy which might trigger significant effects in-combination with other plans and projects (LSE predicted after in-combination HRA screening assessment completed).
- 3.3.3 Elements of the Strategy not filtered out under the above criteria are then screening for likely effects upon NSN Sites, either alone or in combination with other plans or projects and considers whether these impacts are likely to be significant. It includes:
- determining whether the Strategy is directly connected with or necessary for the management of applicable sites (SAC, SPA, Ramsar);
 - describing the project/plan that may have the potential for significant effects upon applicable NSN Sites;
 - undertaking an initial scoping for potential direct and indirect impacts upon applicable NSN Sites;
 - assessing the likely significance of any potential effects identified as resulting from these impacts, both alone and in-combination with other plans and projects; and



- excluding NSN Sites where it can be objectively concluded that there will be no significant effects.

3.3.4 Results of the screening assessment are set out in Section 5. The assessment in relation to in-combination effects are set out in section 5.5.

3.3.5 Following the judgement handed down by the CJEU in Case C-323/17⁷, it is no longer appropriate to consider measures taken specifically to reduce a project's potential impact on European designated sites into account at the screening stage. Accordingly, no reference to mitigation is made, or relied upon, in this screening assessment.

3.4 Further HRA Stages (Stage 2 and 3)

3.4.1 Stages 2, 3 and 4 are outside of the purpose of this assessment, which covers only Stage 1 (screening). The findings of this report will define the scope of the assessment of LSEs through an Appropriate Assessment (Stage 2) if they are identified. The Appropriate Assessment would, where necessary, identify alternative solutions to the Proposed Scheme (Stage 3), and also inform any IROPI arguments that may be required. If options identified at Stage 2 cannot avoid or mitigate adverse effects, then development consent can only be given if Stage 3 is passed.

⁷ Case C-323/17 People Over Wind & Peter Sweetman v Coillte Teoranta ('People over Wind').



4 Identification of NSN Sites

4.1 Study Area

- 4.1.1 The Study Area is defined as the geographic limits from the Strategy used to identify NSN Sites to be considered within the HRA process and be screened for LSEs. The Study Area reflects the high sensitivity of qualifying features of National Network sites and the fact they often support species that are mobile and wide ranging, such as birds.
- 4.1.2 The principal criterion defining the Study Area is a zone of 10km surrounding the BCKLWN, as measured from the borough boundary (shown in Figure 1-3). This distance appropriate to encompass possible effect pathways from the Strategy to NSN Sites. All NSN Sites within this zone have been included into the screening stage of the HRA process to identify potential LSEs.

4.2 Sites Identified

- 4.2.1 Ten NSN Sites with a total of 17 designations were identified that met the Study Area criteria as described above. Note, some Sites receive multiple designations. They are listed below alongside a summary of their qualifying features:
- **Breckland SAC/SPA** – comprises inland dunes with *Corynephorus* and *Agrostis* grasslands and it is also among the best UK areas for natural eutrophic lakes with *Magnopotamion* or *Hydrocharition* vegetation, European dry heaths, and semi-natural dry grasslands on calcareous soils. The habitats support breeding birds and great crested newts.
 - **Nene Washes SAC/SPA/Ramsar** – is an extensive area of seasonally-flooding wet grassland (washland) of importance for national and international populations of breeding and wintering waders and wildfowl. The site is also notable for the diversity of plants and associated animal life within its network of dykes.
 - **Ouse Washes SAC/SPA/Ramsar** – is one of the country's few remaining areas of extensive washland habitat. It provides breeding and winter habitats



for important assemblages of wetland bird species, particularly wildfowl and waders.

- **Norfolk Valley Fens SAC** – comprises a series of valley-head spring-fed fens. 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.
- **River Wensum SAC** – is a naturally enriched, calcareous lowland river which provides niches for a wide variety of specialised plants and animals.
- **Roydon Common and Dersingham Bog SAC** – represent the largest and best examples of crossleaved heath – bog-moss wet heath in East Anglia.
- **Dersingham Bog Ramsar** – is East Anglia's largest remaining example of a pure acid valley mire, and supports extensive bog, wet heath and transition communities over peat. In addition to its internationally important plant communities, the site also supports important assemblages of birds and British Red Data Book invertebrates.
- **North Norfolk Coast SAC/SPA** – North Norfolk Coast SPA is a low-lying barrier coast that extends for 40 km from Holme to Weybourne and includes a great variety of coastal habitats. The site is important within Europe as one of the largest areas of undeveloped coastal habitat of its type.
- **The Wash and North Norfolk Coast SAC** – 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. The embayment supports a variety of mobile species, including a range of fish, otter and common seal.
- **Greater Wash SPA** – covers a large area of the east coast, from East Yorkshire southwards and into Suffolk. Significant breeding and non-breeding populations of birds use the protected waters for foraging during the summer and winter months.



- 4.2.2 Details of Qualifying Features for the designated sites are provided in Table 3-1.
They are shown in Figure 1-3.



Table 4-1 – NSN Site qualifying features

Site	Qualifying Feature	Description
Breckland SAC	<p>Inland dunes with open <i>Corynephorus</i> and <i>Agrostis</i> grasslands</p> <p>Natural eutrophic lakes with <i>Magnopotamion</i> or <i>Hydrocharition</i> - type vegetation</p> <p>European dry heaths</p> <p>Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>)</p> <p>Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>)</p> <p>Great crested newt (<i>Triturus cristatus</i>)</p>	<p>The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts habitats listed in Annex I.</p> <p>The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the Annex II species great crested newt.</p>
Breckland SPA	<p>Stone curlew (<i>Burhinus oedicephalus</i>)</p> <p>Nightjar (<i>Caprimulgus europaeus</i>)</p> <p>Woodlark (<i>Lullula arborea</i>)</p>	The site qualifies under article 4.1 of the Directive (79/409/EEC) as it is used regularly by 1% or more of the Great Britain populations of Annex I Stone curlew, Nightjar and Woodlark.
Nene Washes SAC	Spined loach (<i>Cobitis taenia</i>)	The site is designated under article 4(4) of the Directive (92/43/EEC) for hosting the Annex II species spined loach.



Site	Qualifying Feature	Description
Nene Washes SPA	Northern pintail (<i>Anas acuta</i>) Wigeon (<i>Anas penelope</i>) Northern Shoveler (<i>Anas clypeata</i>) Teal (<i>Anas crecca</i>) Garganey (<i>Anas querquedula</i>) Gadwall (<i>Anas strepera</i>) Bewick's Swan (<i>Cygnus columbianus bewickii</i>)	The site qualifies under Article 4.1 of the EC Birds Directive by regularly supporting in winter, an internationally important wintering population of Bewick's swan. Nene Washes qualifies also under Article 4.2 by supporting, in summer, nationally important breeding populations of regularly occurring migratory species, as well as several other rare birds. The site qualifies under Article 4.2 by supporting, in winter, nationally important wintering populations of five migratory species wigeon, teal, gadwall, Pintail and shoveler.
Nene Washes Ramsar	Eurasian teal (<i>Anas crecca</i>) European golden plover (<i>Pluvialis apricaria apricaria</i>) Common pochard (<i>Aythya farina</i>) Northern shoveler Eurasian wigeon Eurasian teal Ruff (<i>Philomachus pugnax</i>)	The site qualifies under Ramsar criterion 2 as it supports an important assemblage of nationally rare breeding birds. In addition, a wide range of raptors occur through the year. The site also supports several nationally scarce plants, and two vulnerable and two rare British Red Data Book invertebrate species have been recorded. The site qualifies under Ramsar criterion 6 for supporting internationally significant populations of species such as Tundra swan (<i>Cygnus columbianus bewickii</i>), Black-tailed godwit (<i>Limosa limosa islandica</i>), and Northern pintail.
Ouse Washes SAC	Spined loach	The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the Annex II spined loach.



Site	Qualifying Feature	Description
Ouse Washes SPA	<p>Overwintering bird populations:</p> <p>Hen Harrier (<i>Circus cyaneus</i>)</p> <p>Bewick's Swan</p> <p>Whooper Swan (<i>Cygnus cygnus</i>)</p> <p>Ruff</p> <p>Northern Shoveler</p> <p>Mallard (<i>Anas platyrhynchos</i>)</p> <p>Garganey</p> <p>Gadwall</p> <p>Black-tailed Godwit</p> <p>Migratory species:</p> <p>Pintail</p> <p>Shoveler</p> <p>Teal</p> <p>Wigeon</p> <p>Gadwall</p> <p>Pochard</p> <p>Tufted Duck (<i>Aythya fuligula</i>)</p>	<p>The Ouse Washes qualifies under Article 4.1 of the EC Birds Directive by supporting, in summer, a nationally important breeding population of ruff an Annex 1 species.</p> <p>The site also qualifies under Article 4.1 by regularly supporting internationally or nationally important wintering populations of three Annex 1 species.</p> <p>The site also qualifies under Article 4.2 by supporting, in summer, nationally important breeding populations of five migratory species; gadwall, mallard garganey, shoveler and black-tailed godwits.</p> <p>The site further qualifies under Article 4.2 as a wetland of international importance by virtue of regularly supporting over 20,000 waterfowl, with an average peak count of 60,950 birds recorded in the five winter period 1986/7 to 1990/91.</p> <p>The site also qualifies under Article. 4.2 by virtue of regularly supporting, in summer, a diverse assemblage of the breeding migratory waders of lowland wet grassland.</p>



Site	Qualifying Feature	Description
	<p>Mute swan (<i>Cygnus olor</i>)</p> <p>Eurasian coot (<i>Fulica atra</i>)</p> <p>Great cormorant (<i>Phalacrocorax carbo</i>)</p>	
Ouse Washes Ramsar	<p>Criterion 1a – representative example of a natural or near-natural wetland characteristic of its biogeographic region, one of the most extensive areas of seasonally flooding washland of its type in Britain.</p> <p>Criterion 2a – appreciable numbers of nationally rare plants and animals</p> <p>Criterion 5 - internationally important waterfowl assemblage</p> <p>Criterion 6 – internationally important overwintering bird populations</p>	<p>The site is designated under Ramsar criterion 1a for its good representative example of a natural or near-natural wetland characteristic of its biogeographic region. It is one of the most extensive areas of seasonally flooding washland of its type in Britain, and the wetland has high conservation value for many plants and animals.</p> <p>The site is designated under Ramsar criterion 2a for appreciable numbers of nationally rare plants and animals. This includes several nationally scarce plants, including small water pepper (<i>Polygonum minus</i>), whorled water-milfoil (<i>Myriophyllum verticillatum</i>), fringed water-lily (<i>Nymphoides peltata</i>), long-stalked pondweed (<i>Potamogeton praelongus</i>), grass-wrack pondweed (<i>Potamogeton compressus</i>), tasteless water-pepper (<i>Polygonum mite</i>), and marsh dock (<i>Rumex palustris</i>). Invertebrate records indicate that the site holds good relict fenland fauna, including the National Red Data Book species, large darter dragonfly (<i>Libellula fulva</i>) and the rifle beetle (<i>Oulimnius major</i>). The site also supports a diverse assemblage of nationally rare breeding waterfowl associated with seasonally flooding wet grassland.</p>



Site	Qualifying Feature	Description
		<p>The site is designated under Ramsar criterion 5 for supporting Internationally important waterfowl assemblage.</p> <p>The site meets Ramsar criterion 6 by regularly supporting internationally important wintering populations of Bewick's swan, gadwall, pintail, Shoveler, teal, whooper swan, and wigeon.</p>
Norfolk Valley Fens SAC	<p>Alkaline fens</p> <p>Narrow-mouthed whorl snail (<i>Vertigo angustior</i>)</p> <p>Desmoulin's whorl snail (<i>Vertigo moulinsiana</i>)</p>	<p>The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts Annex I listed habitats; Alkaline fens, Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>), Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i>, European dry heaths, <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>), Northern Atlantic wet heaths with <i>Erica tetralix</i> and semi-natural dry grasslands and scrubland facies on calcareous substrates.</p> <p>The site is also designated under article 4(4) of the Directive (92/43/EEC) as it hosts Annex II species Narrow-mouthed whorl snail and Desmoulin's whorl snail.</p>
River Wensum SAC	<p>Desmoulin's whorl snail</p> <p>Freshwater crayfish (<i>Austropotamobius pallipes</i>)</p> <p>Brook lamprey (<i>Lampetra planeri</i>)</p> <p>Bullhead (<i>Cottus gobio</i>)</p>	<p>The site is designated for hosting water courses of plain to montane levels with <i>R. fluitantis</i>, Desmoulin's whorl snail, freshwater crayfish, brook lamprey and bullhead.</p>



Site	Qualifying Feature	Description
Roydon Common and Dersingham Bog SAC	Peat depressions of the Rhynchosporion European dry heaths Wet heathland with cross-leaved heath	The site is designated for its Annex I habitats, including peat depressions of the Rhynchosporion, European dry heaths, and Northern Atlantic wet heaths with <i>Erica tetralix</i> (wet heathland with cross-leaved heath).
Dersingham Bog Ramsar	Important assemblage of invertebrates	The site supports an important assemblage of invertebrates, with nine British Red Data Book species have been recorded.
North Norfolk Coast SAC	Coastal lagoons Perennial vegetation of stony banks Mediterranean and thermo-Atlantic halophilous scrubs (<i>Sarcocornetea fruticosi</i>) Embryonic shifting dunes "Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) Fixed coastal dunes with herbaceous vegetation (grey dunes) Humid dune slacks Otter (<i>Lutra lutra</i>) Petalwort (<i>Petalophyllum ralfsii</i>).	The site is designated for its Annex I habitats, which include coastal lagoons, fixed and shifting dunes (with herbaceous or marram vegetation), dune grasslands, embryonic dunes, humid dune slacks, Mediterranean saltmarsh scrub, and perennial vegetation on coastal shingle banks. The site is also designated for hosting Annex II species including the otter and petalwort.



Site	Qualifying Feature	Description
North Norfolk Coast SPA	<p>Bittern (<i>Botaurus stellaris</i>)</p> <p>Marsh harrier (<i>Circus aeruginosus</i>)</p> <p>Avocet (<i>Recurvirostra avosetta</i>)</p> <p>Little tern (<i>Sterna albifrons</i>)</p> <p>Common tern (<i>Sterna hirundo</i>)</p> <p>Sandwich tern (<i>Sterna sandvicensis</i>)</p> <p>Wigeon</p> <p>Pink-footed goose (<i>Anser brachyrhynchus</i>)</p> <p>Dark-bellied brent goose (<i>Branta bernicla bernicla</i>)</p> <p>Knot (<i>Calidris canutus</i>)</p>	<p>The site qualifies under Article 4(1) by supporting up to 4,500 pairs of sandwich terns, up to 1,000 pairs of common terns, and up to 400 pairs of little terns.</p> <p>The site supports nationally important numbers of bitterns, marsh harriers, Montagu's harriers (<i>Circus pygargus</i>), and avocets. Smaller proportions of the national breeding populations of other species listed on Annex 1 of the Directive are also supported, including arctic tern (<i>Sterna paradisaea</i>), kingfisher (<i>Alcedo atthis</i>), and short-eared owl (<i>Asio flammeus</i>).</p> <p>The site supports internationally important wetland, regularly supporting, in winter, over 10,000 wildfowl and internationally important numbers of the following waterfowl species: dark-bellied brent geese, pink-footed-geese, knot, and wigeon.</p> <p>Nationally important wintering numbers of the following species are also supported: European white-fronted geese (<i>Anser albifrons albifrons</i>), pintails, shelducks (<i>Tadorna tadorna</i>), grey plovers (<i>Pluvialis squatarola</i>), ringed plovers (<i>Charadrius hiaticula</i>), oystercatchers (<i>Haematopus ostralegus</i>), and redshanks (<i>Tringa tetanus</i>).</p> <p>The site also supports nationally important breeding populations of rare species, including gadwall, shoveler, garganey, black-tailed godwit, bearded tit (<i>Panurus biarmicus</i>), and parrot crossbill (<i>Loxia pytyopsittacus</i>).</p>



Site	Qualifying Feature	Description
North Norfolk Coast Ramsar	<p>Sandwich tern</p> <p>Common tern</p> <p>Little tern</p> <p>Red knot (<i>Calidris canutus islandica</i>)</p> <p>Pink-footed goose</p> <p>Dark-bellied brent goose</p> <p>Eurasian wigeon</p> <p>Northern pintail</p> <p>Supports at least three British Red Data Book and nine nationally scarce vascular plants, one British Red Data Book lichen and 38 British Red Data Book invertebrates.</p>	<p>The site is one of the largest expanses of undeveloped coastal habitat of its type in Europe. It is a particularly good example of a marshland coast with intertidal sand and mud, saltmarshes, shingle banks and sand dunes. There are a series of brackish-water lagoons and extensive areas of freshwater grazing marsh and reed beds.</p> <p>Supports at least three British Red Data Book and nine nationally scarce vascular plants, one British Red Data Book lichen and 38 British Red Data Book invertebrates.</p> <p>Supports species/populations occurring at levels of international importance, including sandwich tern, common tern, little tern, red knot, pink-footed goose, dark-bellied brent goose, Eurasian wigeon and northern pintail.</p>
The Wash and North Norfolk Coast SAC	<p>Atlantic salt meadows</p> <p>Coastal lagoons</p> <p>Large shallow inlets and bays</p> <p>Mediterranean saltmarsh scrub</p> <p>Intertidal mudflats and sandflats</p> <p>Reefs</p>	<p>The site is designated under article 4(4) of the Directive (92/43/EEC) as it is hosting the following Annex I habitats: Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>), coastal lagoons, large shallow inlets and bays, Mediterranean and thermo-Atlantic halophilous scrubs (<i>Sarcocornetea fruticosi</i>/Mediterranean saltmarsh scrub), intertidal mudflats and sandflats (mudflats and sandflats not covered by seawater at low tide), reefs, <i>Salicornia</i> and other annuals colonising mud and sand (glasswort and similar species), and subtidal</p>



Site	Qualifying Feature	Description
	Salicornia and other annuals colonising mud and sand. Subtidal sandbanks Common seal (<i>Phoca vitulina</i>) Otter	sandbanks (sandbanks that are slightly covered by seawater at all times). The site is designated under article 4(4) of the Directive (92/43/EEC) for hosting Annex II species: Common seal and otter.
Greater Wash SPA	Red-throated Diver (<i>Gavia stellata</i>) Little Gull (<i>Hydrocoloeus minutus</i>) Sandwich Tern Common Tern Little Tern Common scoter (<i>Melanitta nigra</i>)	The site qualifies under Article 4.1 of the Directive 2009/147/EC by consistently supporting nationally significant populations of Annex I species, including the red-throated diver, little gull, sandwich tern, common tern, and little tern. The site under Article 4.2 of the Directive 2009/147/EC by consistently supporting a population of international significance for the migratory species common Scoter.



5 Scoping and screening Assessment

5.1 Identification of Impacts and Likely Effects

Desk Based Actions; Scoped Out

- 5.1.1 As part of the HRA screening process, objectives and policies, and associated their actions have been assessed against the screening criteria set out in the 3.3.2 methodology section to determine whether they can be scoped out of assessment prior to screening. This evaluation ensured that only those actions with the potential to result in LSEs were carried forward for further consideration and screening for LSEs.
- 5.1.2 By applying these criteria, it was confirmed that desk-based actions do not meet the threshold for potential impacts on NSN sites, supporting their exclusion from the scope of the screening assessment. The objectives, policies and associated targets set out in the Strategy prescribe mostly desk-based actions that will provide information (such as through monitoring or gauging public opinion) and collect data for future decision makers, but do not in themselves imply potential physical changes to the environment. They fall within the bounds of scoping Criterion G (“Policy that could not could not have any conceivable effect on a NSN Site”; as described in paragraph 3.3.2 above) and could not lead to LSEs on NSN sites. They have therefore been scoped out of the screening assessment. Desk-based actions comprise:
- All actions under Objective 1
 - All actions under Objective 2
 - Actions 2 under Objective 3
 - Actions 2 under Objective 4
 - All actions under Objective 5
 - All actions under Objective 6
 - All actions under Objective 7



5.1.3 The Bus Service Improvement Plan⁸ (BSIP) as part of policy 3, Action 1 have been reviewed as part of the screening assessment. The goals and objectives in the BSIP which are beyond 2025 have been assessed against the screening criteria set out in the 3.3.2 methodology section. The long-term vision includes;

- Having reliable services that go to the places people want to go at the times they want to go
- Having waiting areas that are safe and accessible
- Having a range of tickets and affordable fares to suit all needs and journeys
- Having information that is easily accessible and easy to understand.

5.1.4 Each objective and underlying goal and action as part of the BSIP were assessed for its potential to result in likely significant effects. No prescribed action in the BSIP resulted in changes to the environment with majority of actions describing desk-based work. The BSIP actions do not meet the threshold for potential impacts on National Network sites, supporting their exclusion from further screening and appropriate assessment, again under Criterion G.

Actions that Could Result in Environmental Impacts; Scoped In

5.1.5 Following the scoping described above, one action prescribed under the Proposed Strategy has been identified that could lead to physical changes to the environment through its implementation, and as such could result in LSEs on NSN Sites. Action 1 under Objective 4 (Policy 6) “*Deliver the schemes in the King’s Lynn Local Cycling and Walking Infrastructure Plan (LCWIP)*”, could lead to physical changes to the environment through their implementation by King’s Lynn, other public bodies or private developers. Works that would be undertaken to implement the proposed action under each objective are not specifically defined, but may constitute impacts with potential effects on National Network site Qualifying Features. This may be through works undertaken via permitted development rights or via planning consents

⁸ NCC (2024) Bus Service improvement plan. Version 2. Available online: https://www.norfolk.gov.uk/media/20621/Norfolk-Bus-Service-Improvement-Plan/pdf/r2Travel_Norfolk_Bus_Improvement_Plan_June_2024.pdf?m=1720526136817 (accessed 21/08/2025)



issued by Kings Lynn; the transport strategy does not include designs or timescales for physical works itself, and these would occur as a result of implementation of the actions within Norfolk during the period 2025 – 2035.

5.2 Consideration of Likely Effects and their Significance

- 5.2.1 Objective 4 (Policy 6), Action 1: *Deliver the schemes in the King's Lynn Local Cycling and Walking Infrastructure Plan* has been scoped in as potentially causing potential significant effects to the national network sites. The LCWIP serves as an independent infrastructure plan. Due to the limited detail regarding actionable deliverables, the LCWIP should be evaluated for any potentially significant effect at the project level when detail of which scheme will be put forward and its specifications.
- 5.2.2 The purpose of the LCWIP⁹ is to identify and prioritise cycling and walking network improvements which can be implemented in the short, medium and long term. The LCWIP contains the detail of the priority cycling and walking network improvements schemes identified by the planning process.
- 5.2.3 The objective of the priority schemes identified is to improve the connectivity and accessibility of the King's Lynn cycling and walking network for everyone. The overall aim is that these improvements will encourage more people to choose a form active travel, such as cycling and walking, for making shorter journeys which can bring health, environmental and economic benefits for the region.
- 5.2.4 Table 5-1 below identifies potential effects NSN sites that could result from implementation of Action 1 under Objective 4 (Policy 6) of the Strategy. The town boundaries of King's Lynn do not coincide with the boundaries of any NSN Sites, and thus only indirect impacts (i.e. those transmitted through an intermediary pathway, such as emissions resulting in deposition of dust or chemicals, or waterborne pollution) would occur. Potential effects of impacts could occur during the construction of physical features resulting from implementation of transport strategy.

⁹ BCKLWN (2022) King's Lynn cycling and walking Infrastructure Plan. Available online: https://www.west-norfolk.gov.uk/download/downloads/id/8479/f67_-_local_cycling_and_walking_infrastructure_plan_lcwip.pdf (Accessed 21/08/2025)



Table 5-1 – Potential effects of the Strategy Action 1 under Objective 4 (Policy 6)

Phase	Potential Effect	Description
Construction	Fragmentation of supporting habitats	Implementation of the transport strategy through the planning system and public works undertaken by king's Lynn (e.g. deliver new cycle routes) could lead to works that require removal of habitat within greenspaces and along water courses in Norfolk.
Construction	Dust and particulate emissions	Implementation of the transport strategy could lead to works that, during construction, release dust and particulate emissions whose deposition may negatively affect the condition of habitats (such as through smothering of plants or changing soil chemistry) and the species that rely on them.
Construction	Air quality changes from emissions	Implementation of the transport strategy could lead to works that, during construction, could result in emissions from construction vehicles and equipment. These changes in air quality could lead to deposition of pollutants, including nitrogen, changing the soil chemistry and composition of plant communities, and consequently the species that rely on them.
Construction	Chemical run-off	Implementation of the transport strategy could lead to works that, during construction, result in sediments and pollutants entering the national network sites. This could affect habitats and species within these sites adversely.

5.2.5 Screening at the project level should be undertaken for LCWIP schemes to determine whether the LSEs identified are applicable to them.

5.3 Referenced Transport Projects

5.3.1 The Projects that are listed in Appendix A are referenced by the Strategy, which supports their delivery, but does not define them, with some currently underway and others may be brought forward in the future. Individual transport projects will be subject to a separate Habitats Regulations Assessment (HRA) screening, followed by Appropriate Assessment and further HRA stages as required. Some project listed have already been subject to the HRA process. For those to be advanced in future, HRA will be undertaken once more detailed information regarding the nature, scale, and location of such projects becomes available. This approach ensures that any



potential effects on NSN sites are fully considered in accordance with regulatory requirements at the appropriate stage of project development.

5.4 Potential in-combination effects

5.4.1 When assessing the potential implications of a plan or project in light of the conservation objectives for a Habitat Site (i.e. assessing the potential for LSE and ascertaining the potential for effect on site integrity), it is necessary to consider the potential for in-combination effects with other plans and projects on the designated interest features/conservation on the site.

5.4.2 Natural England's Habitats Regulation Guidance Note 4 (English Nature, 2001) provides guidance on in-combination effects and state that other plans or projects should include:

- Approved but as yet uncompleted plans or projects;
- Permitted on-going activities such as discharge consents of abstraction licences; and
- Plans and projects for which an application has been made and which are currently under consideration but not yet approved by competent authorities.

5.4.3 In undertaking an in-combination assessment, it is important to consider the potential for each plan or project to influence the site. In order for an in-combination effect to arise, the nature of two effects does not necessarily have to be the same. The in-combination assessment, therefore, focuses on the overall implications for the site conservation objectives regardless of the type of effect.

5.4.4 There is the potential for additional effects, or severity of effects, arising 'in-combination' with other plans and projects. It will be necessary to consider potential in-combination effects as projects come forward during the same time as the LCWIP details are being formalised.



Table 5-2 Summary of Assessment Outcomes

Objective/Target	Policy	Action	Outcome
1 Growth	Policy 1 Supporting Growth and New Development	Work with partners to inform decisions about new development	Scope out: Criterion G
1 Growth	Policy 1 Supporting Growth and New Development	Seek to mitigate any adverse effects of new development on the transport network	Scope out: Criterion G
1 Growth	Policy 1 Supporting Growth and New Development	Ensure there is the necessary infrastructure to support the transition to a clean transport network	Scope out: Criterion G
2 Connectivity	Policy 2 Strategic Connections	Develop local transport projects in the Norfolk Strategic Infrastructure Delivery Plan	Scope out: Criterion G
2 Connectivity	Policy 2 Strategic Connections	Plan accessibility as part of service delivery	Scope out: Criterion G
2 Connectivity	Policy 2 Strategic Connections	Make the case for investment to the rail network and Strategic Road Network	Scope out: Criterion G
2 Connectivity	Policy 3 Parking	Consider transport interventions that improve access to the King's Lynn Enterprise Park	Scope out: Criterion G
2 Connectivity	Policy 3 Parking	Work in partnership with organisations including National Highways, Network Rail and Transport East	Scope out: Criterion G
3 Public Transport	Policy 4 Bus Services	Deliver Bus Service Improvement Plan (BSIP) projects	Scope out: Criterion G



Objective/Target	Policy	Action	Outcome
3 Public Transport	Policy 5 Rail	Engage with Rail operators and Network Rail/Great British Railways	Scope out: Criterion G
4 Active Travel	Policy 6 Active Travel	Deliver the schemes in the King's Lynn Local Cycling and Walking Infrastructure Plan (LCWIP)	Screen in: LSEs identified. Project level screening identified
4 Active Travel	Policy 6 Active Travel	Reprioritise space, especially within urban areas	Scope out: Criterion G
5 Environment	Policy 7 Climate Change Resilience	Railway Road: Monitoring of air quality	Scope out: Criterion G
5 Environment	Policy 8 Improved Air Quality	Railway Road: Monitoring of air quality	Scope out: Criterion G
6 Safety	Policy 9 Road Traffic Harm Reduction	Use the safe system approach to understand the safety in the network	Scope out: Criterion G
7 Culture and Heritage	Policy 10 Supporting Culture, Heritage and Tourism	Improve the quality of place through conserving and enhancing the built environment	Scope out: Criterion G
7 Culture and Heritage	Policy 10 Supporting Culture, Heritage and Tourism	Work with cultural organisations in King's Lynn	Scope out: Criterion G
7 Culture and Heritage	Policy 10 Supporting Culture, Heritage and Tourism	Take into account the ten year Cultural and Heritage Strategy for King's Lynn	Scope out: Criterion G



Objective/Target	Policy	Action	Outcome
7 Culture and Heritage	Policy 10 Supporting Culture, Heritage and Tourism	Make existing settlements and transport infrastructure more attractive	Scope out: Criterion G



6 Discussions and Recommendations

- 6.1.1 During the screening process, the majority of objectives set out in the Strategy were found not to have the potential for significant effects and were therefore screened out at an early stage. Only Objective 4 (Policy 6), Action 1 *Deliver the schemes in the King's Lynn Local Cycling and Walking Infrastructure Plan* was scoped in for further detailed assessment as LSEs were identified.
- 6.1.2 The LCWIP serves as an independent infrastructure plan. Due to the limited detail regarding actionable deliverables, it should be evaluated for any potentially significant effect at the project level.
- 6.1.3 Further consideration is required in regard to in-combination effects to ensure that the potential for LSE and adverse effects on the integrity of NSN Sites is investigated and appropriately mitigated if the LCWIP is screened in for further appropriate assessment.

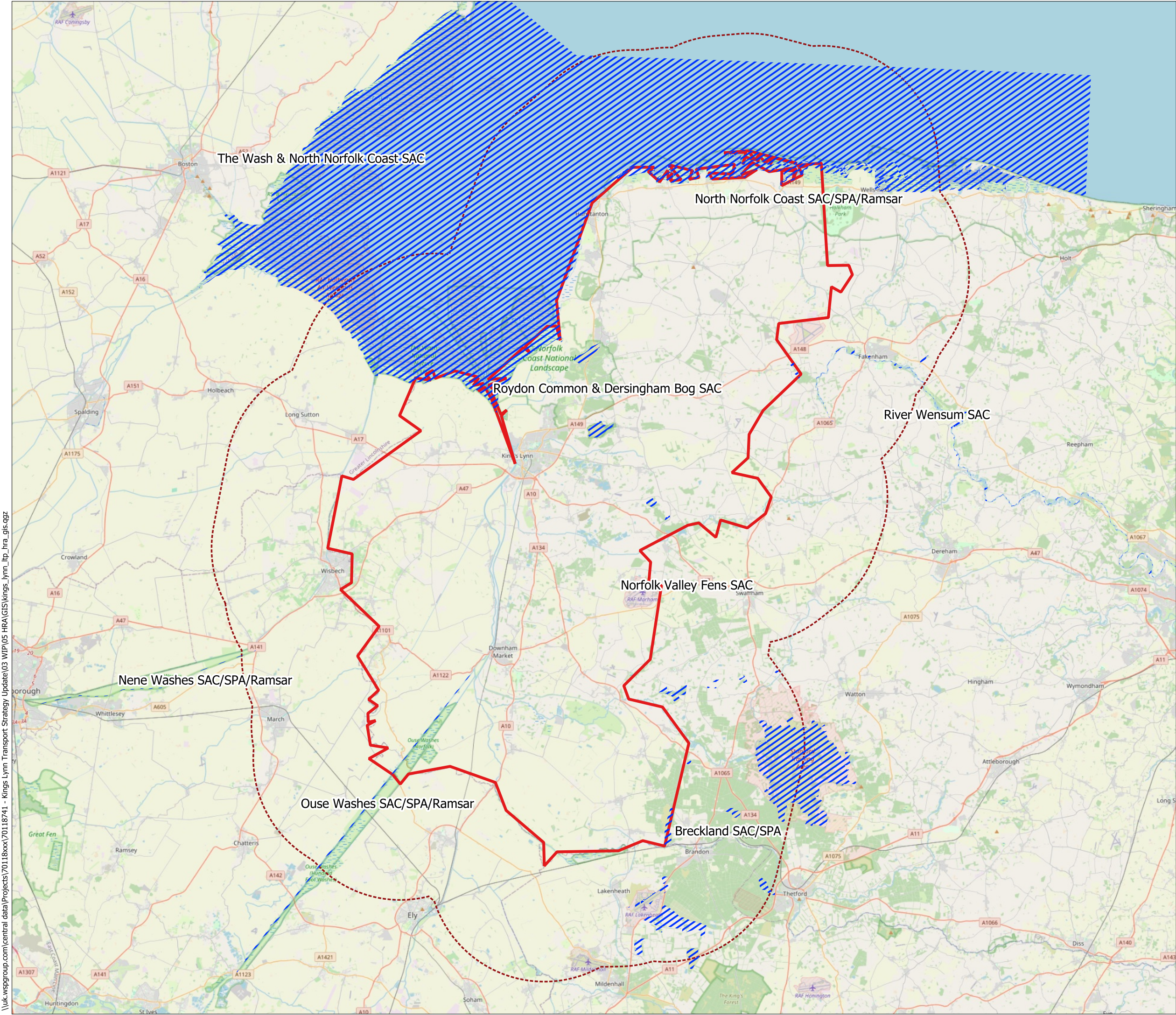


7 Conclusions

- 7.1.1 The majority of objectives within the Strategy are unlikely to result in likely significant effects on national network sites, as these are based in desk-based actions to be accomplished. However, further assessment is warranted in relation to Objective 4 (Policy 6), Action 1, specifically the delivery of schemes outlined in the King's Lynn Local Cycling and Walking Infrastructure Plan. Given the limited detail currently available regarding the actionable aspects of the LCWIP, and its potential to contribute to in-combination effects with other plans and projects, it is essential that a project-level evaluation is undertaken once more concrete specifications are available. This approach will ensure that the potential for likely significant effects (LSE) and any adverse impacts on the integrity of national network sites is fully investigated and, where necessary, mitigated appropriately.
- 7.1.2 The recommendation is therefore to conduct a further Habitats Regulations Assessment (HRA) screening of the LCWIP once it has reached a more advanced stage of development. This will facilitate a robust evaluation of environmental risks and support the formulation of appropriate mitigation strategies, ultimately safeguarding the conservation objectives of the affected site.



8 Figures



LEGEND:


King's Lynn and West Norfolk Borough Boundary

10km Buffer

Special Area of Conservation

STATUS:

FOR INFORMATION ONLY



WSP House, 70 Chancery Lane
London, WC2A 1AF
Tel: +44 20 7314 5000
www.wsp.com

CLIENT:

Borough Council of King's Lynn and West Norfolk

PROJECT:

King's Lynn Transport Strategy
Update: Information to Inform a
Habitats Regulations Assessment

TITLE:

National Site Network Sites Identified

SCALE @A3:	DRAWN:	APPROVED:
1:500,000	NMR	PJ
VERSION:	DATE:	DATE:
1	22/08/25	22/08/25
PROJECT No:	DRAWING No:	
UK-70118741	Figure 1	



LEGEND:

 King's Lynn and West Norfolk Borough Boundary

10km Buffer

 Ramsar

STATUS:

FOR INFORMATION ONLY



WSP House, 70 Chancery Lane
London, WC2A 1AF
Tel: +44 20 7314 5000
www.wsp.com

CLIENT:

Borough Council of King's Lynn and West Norfolk

PROJECT:

King's Lynn Transport Strategy Update: Information to Inform a Habitats Regulations Assessment

TITLE:

National Site Network Sites Identified

SCALE @A3:

1:500,000

DRAWN:

NMR

APPROVED:

PJ

VERSION:

1

DATE:

22/08/25

DATE:

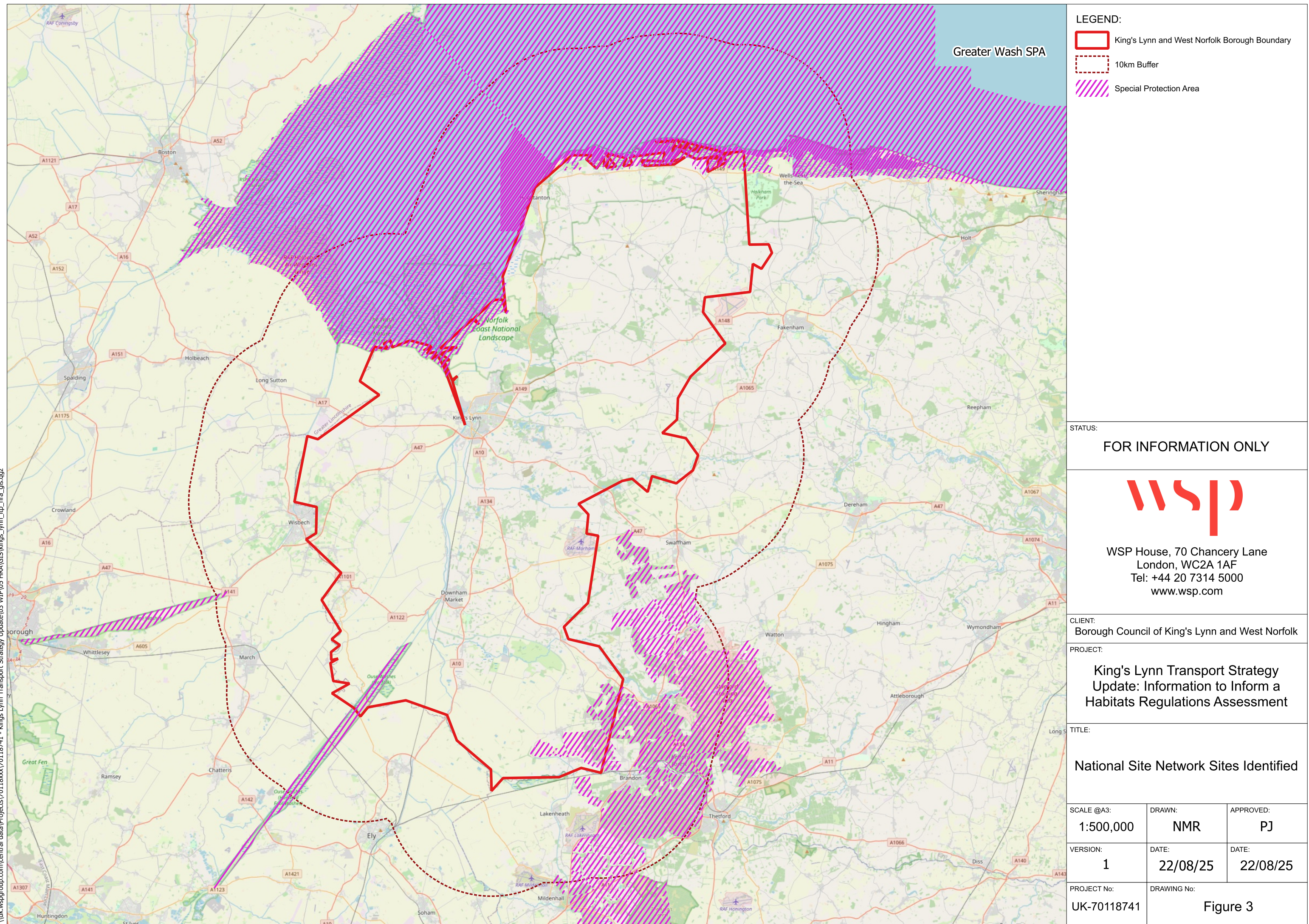
22/08/25

PROJECT No:

UK-70118741

DRAWING No:

Figure 2





Appendix A – List of Relevant Transport Projects



Project	Description	Details
A17/A47 Pullover Roundabout improvement scheme	This scheme provides an A47 to A17 flyover required to address daily congestion and delay which affects all travellers including business users.	This option forms part of a Major Road Network (MRN) scheme and proposes improvements to the A17 Pullover Roundabout, a key junction connecting regional and strategic routes. The roundabout currently suffers from congestion and limited capacity, impacting both local and longer-distance travel. Proposed upgrades could include lane widening, reconfiguration, or signalisation to improve throughput and journey time reliability on this vital corridor
A47 Tilney to East Winch to dual carriageway improvement	A continuous stretch of dual carriageway from Shoreboat Roundabout to East Winch when combined with other A47 National Highways schemes	road user safety and an increase in capacity to support growth
A149 improvement	Early work is underway to consider localised improvements, but the stakeholder and public view is that it should be brought up to dual carriageway standard which would put it in the category of a DfT Large Local Major (LLM) scheme.	The A149 King's Lynn eastern bypass is carrying daily traffic levels way in excess of the standard of the road and daily congestion and delay is hindering both general and business traffic



Project	Description	Details
Introduce a Micromobility scheme in King's Lynn	This is the introduction of an e-scooter/e-bike/cycle hire scheme in King's Lynn.	It would allow shorter-distance journeys, which might otherwise be undertaken by car, to be replaced using cycles or e-scooters and encourage multi-modal journeys
A10 West Winch Housing Access Road	It will provide an effective bypass route around West Winch and includes significant accompanying sustainable transport measures to offer choice to the new residents.	This scheme provides additional strategic highway capacity to accommodate trips from 4,000 new homes in the West Winch Growth Area (WWGA).
West Winch link road	West Winch link road to connect to A10 within the Hopkins Homes development	This will provide a new link road to provide a highway connection between the WWHAR and the existing A10. This will provide new active travel network alongside the new road.
Local Air Quality around schools	Improve Local Air Quality around school premises	Work with schools to introduce measures to improve air quality around schools
STARS Gyratory Plus	This scheme comprises new cycle lanes, widened footways and public realm improvements to the town centre gyratory system on Railway Street as set out in the Kings Lynn STARS scheme. It also includes additional improvements for walking and cycling on roads radiating out from the	Poor walking and cycling facilities and a poor pedestrian environment.



Project	Description	Details
	gyratory and the Borough Council's public realm enhancement at Baxter's plain which complements other funded regeneration initiatives.	
STARS Southgates regeneration	Highway layout changes that convert the Southgates roundabout in to two signalised junctions and divert London Road around the historic South Gate.	These layout changes are required to facilitate the adopted Southgates Masterplan for regeneration which includes extensive improvements for walking and cycling and the public realm
Secure cycle parking across the town	Provide secure cycle parking across the town, including near CCTV at the rail station	This option involves expanding the provision of secure cycle parking at key locations throughout King's Lynn, including at the rail station and other high-demand areas. Prioritising locations covered by CCTV would improve security and user confidence. Improved cycle parking supports efforts to increase cycling as a daily travel mode by reducing theft risk and improving convenience for cyclists.
A17/A47 Pullover Roundabout improvement scheme	This scheme provides an A47 to A17 flyover required to address daily congestion and delay which affects all travellers including business users.	This option forms part of a Major Road Network (MRN) scheme and proposes improvements to the A17 Pullover Roundabout, a key junction connecting regional and strategic routes. The

Project	Description	Details
		roundabout currently suffers from congestion and limited capacity, impacting both local and longer-distance travel. Proposed upgrades could include lane widening, reconfiguration, or signalisation to improve throughput and journey time reliability on this vital corridor
A47 Tilney to East Winch to dual carriageway improvement	A continuous stretch of dual carriageway from Shoreboat Roundabout to East Winch when combined with other A47 National Highways schemes	road user safety and an increase in capacity to support growth
A149 improvement	Early work is underway to consider localised improvements but the stakeholder and public view is that it should be brought up to dual carriageway standard which would put it in the category of a DfT Large Local Major (LLM) scheme.	The A149 King's Lynn eastern bypass is carrying daily traffic levels way in excess of the standard of the road and daily congestion and delay is hindering both general and business traffic
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Investigate taxis role to support the night time economy	Investigate how taxis could be increased and better support the night time economy	Taxi availability has reduced dramatically since Covid-19 Pandemic. Investigate how the availability could be improved and how autonomous vehicles may contribute in the future
Secure cycle parking at Southgates	Provide secure cycle parking at Southgates	This option involves installing secure cycle parking at Southgates to encourage cycling as a



Project	Description	Details
		viable travel option for commuters and local residents. Currently, cycle parking in this area is limited, which can deter cyclists from using public transport or accessing local amenities by bike.
Improvements to the Sandline active travel route	Improvements to the Sandline active travel route between Fairstead and Hardwick	Investigate how best to provide access across the railway line and around the town for modes other than private car to relieve some of the congestion pressure in Gaywood area. Fairstead Road / Queen Mary Road / Hardwick link road to enable trips to be undertaken without travelling through Gaywood Clock and the town centre gyratory
Ensure appropriate bus services from West Winch Growth areas	Work with the developers to ensure appropriate bus services from West Winch Growth areas and that the route is suitable for services	This will provide an enhancement to existing bus provision nearby and provide a new bus service for the development at West Winch.
Active travel link between the West Winch Growth Area (WWGA) and King's Lynn town centre	This scheme provides a new off road walking and cycling route to connect the West Winch Growth Area (WWGA) to Kings Lynn. It includes a new crossing of the A149 and provides new infrastructure to form a safe	To encourage active travel from the WWGA



Project	Description	Details
	active travel route from the WWGA to link with the LCWIP network via Greenyard Way	
Investigate feasibility of a new Railway station south of King's Lynn	Investigate potential for new South Lynn railway station either just inside A47, or just outside, sited on current Kings Lynn to Cambridge line	The station could be used to serve West Winch if accompanied with suitable bus services. With a shuttle train service or bus, it could also be used as a park and ride
Renewal of the West Lynn Ferry Infrastructure	Improvements to ferry infrastructure, and ancillary infrastructure, to ensure the service can continue to operate.	It is currently closed due to safety concerns.
Extension of bus times to and from Rollesby Road industrial area	Extension of bus times to and from Rollesby Road industrial area to introduce early bus service (7:30am)	This option involves introducing an earlier bus service to the Rollesby Road industrial area, with the first arrival timed for 7:30am. Currently, there are limited public transport options serving this area before standard working hours, which can make it difficult for employees on early shifts to commute by bus. As a result, many rely on private vehicles or face barriers to accessing employment. Introducing an earlier service would improve accessibility to jobs, support shift-based working patterns, and encourage greater use of public transport



Project	Description	Details
Improve maintenance of the Clenchwarton Cycle Path	Improve maintenance of the Clenchwarton Cycle Path	Improved budget for maintenance of the Clenchwarton Cycle Path
Bus priority along London Road	Investigate buses priority along London Road. Consideration should be given to giving buses priority along London Road and encouraging cars to use Hardings Way particularly to access Boal St car parks.	This option involves considering bus priority measures along London Road to improve journey times and reliability for services entering King's Lynn from the south. At present, congestion affects bus punctuality along this corridor. In parallel, private vehicle access to Boal Street car parks could be encouraged via Hardings Way to reduce conflicts with bus movements. These changes would support more efficient and attractive bus services and help reduce congestion in the town centre.
Encourage greater use of the Harding's Way bus route	Encourage greater use of the Harding's Way bus route	Harding's Way as a bus only route to accommodate an increase in buses and bus usage with buses also continuing to serve London Road. A combination of routes is required. Retain Hardings Way as traffic-free except buses. Encourage more buses to make use of the route and the potential reliability/journey time benefits. Retain high level



Project	Description	Details
		of provision for pedestrians / cyclists and especially vulnerable road users and mobility scooters
Improve bus accessibility	Improve bus accessibility of area south to Hardwick roundabout.	Improve bus accessibility of area south to Hardwick roundabout. The Regent Avenue bus stops on West Winch Road are 100m closer to Hardwick Narrows than those on Hardwick Road, but still too far for most people, plus they are not served by First and so have even more limited services and times
Safety improvements around the port for active travel users	Improvements in the vicinity of the Port to improve safety for vulnerable active travel users	This option focuses on improving safety for vulnerable active travel users, such as pedestrians and cyclists, in the vicinity of the Port. Currently, the area presents challenges for non-motorized users, with limited infrastructure to protect them from traffic. Safety improvements could include better crossings, dedicated cycle lanes, and improved lighting. The aim is to encourage more sustainable travel modes, improve safety, and enhance the user experience for pedestrians and cyclists near the Port

Project	Description	Details
Active travel facilities as set out in the West Winch masterplan	Ensure active travel facilities as set out in the West Winch masterplan are delivered	To provide a network of new active travel infrastructure within West Winch development to encourage connectivity and links to the existing network
BSIP improvements - northbound bus lane between Hardwick Road and Southgates	Proposed northbound bus lane between Hardwick Road and Southgates Roundabout (extent to be confirmed), as part of BSIP improvements	This option proposes the introduction of a dedicated northbound bus lane on the approach to Southgates Roundabout from Hardwick Road, with the exact extent to be confirmed through further design work. The existing corridor experiences significant traffic volumes, particularly during peak periods, which can lead to delays for bus services and reduced service reliability
Reinstate direct bus links to Sheringham, Cromer and March	Reinstate direct links to Sheringham, Cromer and March	This option proposes reinstating direct regional bus services from King's Lynn to destinations such as Sheringham, Cromer, and March. These connections were previously available but have been withdrawn over time, reducing travel choices and weakening regional connectivity. Restoring these links would improve access to employment, education, and leisure opportunities in neighbouring towns, while

Project	Description	Details
		supporting a more integrated and inclusive transport network across the region
Safety improvements at the A149 Queen Elizabeth Hospital roundabout	Safety improvements at the A149 Queen Elizabeth Hospital roundabout	This option involves making safety improvements at the A149 Queen Elizabeth Hospital roundabout, which is a key junction for both motorists and active travel users. The roundabout currently poses safety concerns for pedestrians and cyclists due to its busy nature. Proposed improvements could include better crossings, clearer signage, and physical barriers to protect non-motorized users, ensuring safer journeys and promoting the use of active travel options
Provide new right turn lane on A1076 into Queensway	Provide new right turn lane on A1076 into Queensway	To assist the right turn from A1076 into Queensway - create an additional queuing lane to reduce the impact on other traffic
Improve bus stops to be provided with shelters	Improve bus stops to be provided with shelters, maintenance issues to be fixed (eg. Downham Market has a shelter but no bus service)	This option focuses on enhancing the quality and usability of bus stops across the town by ensuring they are well-maintained and include shelters for weather protection. In some locations, such as Downham Market, infrastructure like shelters exists but is not

Project	Description	Details
		currently served by active bus routes. Addressing such mismatches and improving the condition and comfort of stops would support a more attractive passenger experience and encourage greater bus use, especially in rural and peripheral areas
Investigate establishing 'connection/ mobility hubs' for bus services	Investigate establishing 'connection/ mobility hubs' for bus services around the town so you don't have to go through the centre for all journeys	This option involves investigating the feasibility of creating mobility hubs around the town to support better connectivity between suburbs and key destinations without requiring travel through the town centre. At present, many bus routes are radial in nature, meaning most journeys must pass through central King's Lynn. Establishing peripheral interchange hubs would enable more direct travel across the town, improving convenience, reducing pressure on central infrastructure, and supporting wider network efficiency
Additional car parking could be provided at West Lynn to service the ferry	Consider how additional car parking could be provided at West Lynn to service the ferry, potentially as part of a P&R Strategy	This option explores opportunities to increase car parking provision at West Lynn in order to support ferry use as part of a potential Park & Ride scheme. Currently, limited parking may

Project	Description	Details
		discourage commuters and visitors from using the ferry. Additional spaces would improve access for car users wishing to switch to the ferry for cross-river travel, potentially easing congestion on town centre roads and supporting sustainable transport goals
Introduce a cycle route around the Historic Quayside	Introduce a cycle route around the Historic Quayside, including King Street	Provide a combination of cycle dismount signs and bike storage in strategic locations at entry points to the town centre. Alternative cycle through-route around the main shopping district of the town centre
Develop and implement schemes in the Local Cycling and Walking Infrastructure Plan (LCWIP)	This includes many walking and cycling schemes over an extensive and well defined network. A notable key scheme is a new signalised pedestrian and cycle crossing over Tennyson Road combined with the existing Network Rail railway level crossing.	Problems and issues as identified in the LCWIP
Include "Park and Stride" and "Park and Pedal" as potential measures	Include "Park and Stride" and "Park and Pedal" as potential measures	This option involves introducing Park and Stride and "Park and Pedal" schemes to support multimodal travel and reduce car dependency. Park and Stride facilities would encourage people to park on the outskirts of the town and

Project	Description	Details
		walk the final leg of their journey, while "Park and Pedal" would allow cyclists to park and then continue their journey by bike. Both measures would improve accessibility to the town centre, reduce congestion, and promote healthier, more sustainable travel choices
Improve walking routes on riverbank around West Lynn and for the Ferry (Improve walking routes on riverbank around West Lynn and for the Ferry (safety and footpaths)	This option focuses on enhancing walking routes along the riverbank around West Lynn and near the ferry terminal to improve safety and accessibility for pedestrians. Currently, footpaths in these areas may be inadequate or poorly maintained, making walking along the riverbank less attractive. Upgrades could include resurfacing footpaths, improving lighting, and providing better pedestrian crossings, ensuring that these routes are safer, more pleasant, and accessible for all users
Improve cycle route at Hardwick Road	Improve cycle route at Hardwick Road	There are more crossings and traffic lights for cyclists than there are for cars, which makes cycling less attractive. Hardwick Road traffic lights- 12 cycling and walking crossings. Opportunity to smooth out route



Project	Description	Details
Provide publicly available EV charging points on street and in car parks	Provide publicly available EV charging points on street and in car parks	Widespread EV is 5-10 years from mass adoption for all new vehicles based on current government policy. Investigate the likely future EV charging requirements for car parks and streets in Kings Lynn (particularly if off-street parking is not available) and investigate methods of bringing this into streets and car parks and potential funding sources
Consider disused railway lines in delivering active travel schemes	Ensure disused railway lines are considered when delivering the wider connections to/from the King's Lynn LCWIP	Ensure disused railway lines are considered when delivering the wider connections to/from the King's Lynn LCWIP
Improvements to Watlington Rail Station car park	Improvements to Watlington Rail Station car park to accommodate local growth	This option includes improvements of car parking facilities at the railway station and access improvement to Watlington and Downham Market to support growth in the new King's Lynn Local Plan
Improvements to Downham Market Rail Station car park	Improvements to Downham Market Rail Station car park to make it a Parkway station to support local commute and to serve the population of King's Lynn	This option includes improvements of car parking facilities at the railway station and access improvement to make Downham Market a Park & Rail/Parkway station

Project	Description	Details
Implement the BCKLWN parking strategy	Implement the BCKLWN parking strategy including any Park and Ride proposals	Locations: West Lynn near the ferry, NORA (near fire station), park and ride tied into either BRT or South Lynn Station plus or other to reduce traffic congestion in town
Extension of bus times to and from West Winch	Extension of bus times to and from West Winch to introduce services operating after 6pm	This option involves extending bus service operating hours between West Winch and King's Lynn to include evening services after 6pm. Currently, bus services on this route cease in the early evening, limiting travel options for those working late, accessing evening education, or participating in social or leisure activities. This lack of service can discourage bus use and increase reliance on private vehicles
Implement off road cycle routes to destinations beyond the King's Lynn urban area	Implement off road cycle routes to destinations beyond the King's Lynn urban area	Investigate opportunities for cycling to nearby towns and villages located to the east of King's Lynn. Leziate, Ashwicken, Bawsey and Pott Row are closer than Roydon. Congham and Grimston are practically joined on. Middleton is one field away from North Runcton. All should be cyclable easily and included



Project	Description	Details
		The most popular active travel routes are separated from private motor vehicles: Fen Rivers Way, Hardings Way / Nar Valley Way, Sandringham Railway Path, Sand Line Path and Spring Lane / Shepherds Way. Extend all but one, and to add new ones east on the former Lynn & Fakenham Railway and its Gaywood branch
Safety improvements for pedestrians	Safety improvements for pedestrians at the junction of Kensington Road and Queensway near the school	Safety improvements at junction of Kensington Road and Queensway
Ely Area Capacity Enhancements (EACE) and investigation of other rail improvements	The EACE scheme will increase track capacity at a location where 5 railway lines converge.	It will unlock a barrier to providing increased frequency of rail service to Cambridge and London.



Norfolk County Council