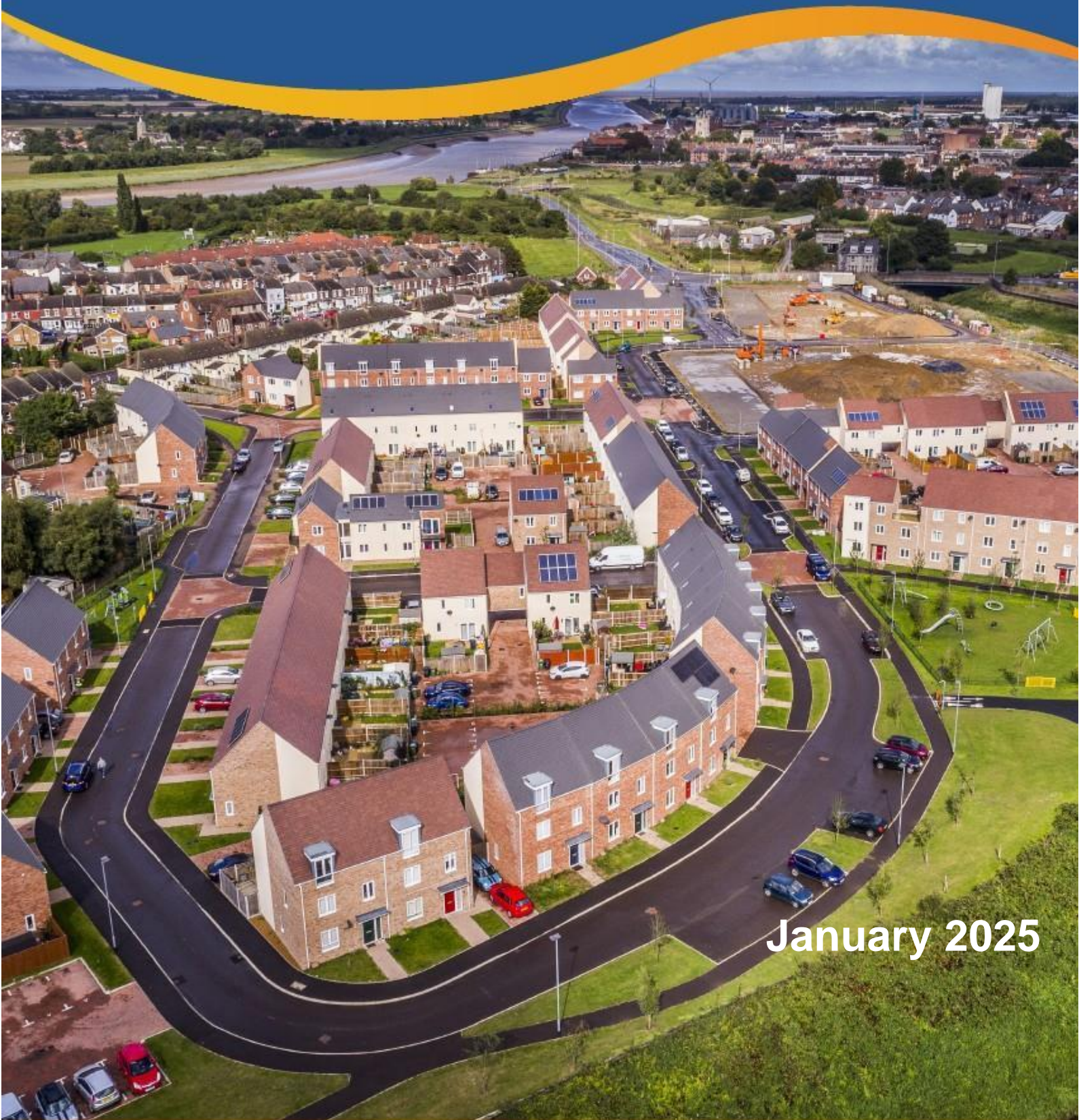


Authority Monitoring Report (AMR) 2020/21 - 2023/24

Borough Council of
King's Lynn &
West Norfolk



January 2025

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Executive Summary

This monitoring report covers the following financial years (monitoring periods):

- 1 April 2020 – 31 March 2021;
- 1 April 2021 – 31 March 2022;
- 1 April 2022 – 31 March 2023; and
- 1 April 2023 – 31 March 2024.

The report identifies the progress in implementing and updating the Borough Council's Local Plan during this period. Local planning authorities are required to prepare such reports under Section 35 of the Planning and Compulsory Purchase Act 2004 (as amended).

Introduction

This Local Planning Authority Monitoring Report (AMR) for the Borough Council of King's Lynn and West Norfolk looks back over the following financial years:

- 1 April 2020 – 31 March 2021;
- 1 April 2021 – 31 March 2022;
- 1 April 2022 – 31 March 2023; and
- 1 April 2023 – 31 March 2024.

It aims to monitor progress in planning for the Borough during this 4-year period, bringing the Borough Council's suite of AMRs fully up to date, as of April 2024. Data from earlier monitoring periods is included for several monitoring indicators, where this is necessary to set the context for subsequent data.

This Monitoring Report is produced under Section 35 of the Planning and Compulsory Purchase Act 2004, as amended by the Localism Act 2011.

Purpose of the Authority Monitoring Report

The AMR aids the Borough Council and the public in assessing the impact of the planning policies in place. This form of monitoring is a fundamental part of the planning process.

This document focuses on:

1. The impact and relevance of existing planning policies during the monitoring period, such as:
 - Are policies achieving their objectives and in particular, are they delivering sustainable development?
 - Have policies had unintended consequences?
 - Are the assumptions and objectives behind policies still relevant?
 - Are the targets being achieved?
2. The progress achieved in preparing new plans and policies, measured against the Borough Council's Local Development Scheme (LDS).

The monitoring of policy documents and the performance of policies is a key part of the cyclical Local Plan process of 'plan, monitor, review'. This ensures the early identification of issues, establishing a clear vision and objectives. It also provides a clear mechanism for checking that targets have been met.

Content

The statutory requirements for monitoring reports are:

1. Progress against Local Development Scheme
 - Documents timetabled
 - Stages reached
 - Reasons for any delay
 - Any plans or supplementary planning documents adopted
2. Any local plan policies not being implemented
 - Which policy?
 - Why it is not being implemented?
 - Any steps being taken in this regard
3. Net additional dwellings & affordable dwellings
 - In the monitoring period

- Since the start of the policy
4. Duty to Cooperate
 - Details of action taken during monitoring period
 5. Information collected for monitoring purposes.
 6. Neighbourhood Plans or Orders
 - Any made or submitted to the Borough Council for examination
 7. Community Infrastructure Levy (CIL)
 - Over the relevant monitoring period

The above is included within this report. The reporting of this is structured to align with the objectives and monitoring framework of the Borough's adopted Local Plan. This currently comprises the Core Strategy adopted 2011 and the Site Allocations and Development Management Policies (SADMP) Plan adopted 2016. It will form the penultimate Authority Monitoring Report (AMR) for the current adopted Local Plan (covering the period 2001-2026). The replacement Local Plan 2021-2040 is anticipated to be adopted by March 2025, so monitoring against this Plan is expected to commence from the 2025-2026 monitoring period.

Each section - Economy, Society and Environment - provides an overview of the relevant objectives and the outcomes, as well as a list of relevant Local Plan Policies.

Relevant indicators are included and discussed in each section. Certain 'Core Output Indicators' were previously required by Government. Although this national requirement has gone, some of this data provides helpful indicators of the volume and types of development achieved locally during the relevant period, and the further development of a time series of comparable data will provide added information/value over time, where available.

Economy

The Core Strategy Objectives relating to the economy are:

- King's Lynn's reputation as a great place to live and work has spread across the country and reflects its regional importance.
- West Norfolk has a thriving economy with local employment opportunities.
- All young people access schools that motivate and raise aspirations to succeed in a prospering local economy.
- All adults have the opportunity to develop their skills or learn new ones throughout their lives.
- West Norfolk is among the premier visitor destinations in the country with tourism based on its historical, cultural and environmental offer.

Core Strategy Economic Policies (CS) (2011):

- CS02 Settlement Hierarchy Policy
- CS03 King's Lynn Policy
- CS04 Downham Market Policy
- CS05 Hunstanton Policy
- CS07 Coastal Areas Policy
- CS08 Sustainable Development Policy
- CS09 Housing Policy
- CS10 The Economy Policy
- CS12 Environmental Assets Policy
- CS13 Community and Culture Policy
- CS14 Implementation

Site Allocations and Development Management Policies (SADMP) (2016) Economic Policies:

- DM10 Retail Development Policy
- DM11 Touring and Permanent Holiday Sites Policy
- DM12 Strategic Road Network Policy
- DM13 Disused Railway Track Beds Policy
- DM14 Development Associated with CITB Bircham Newton and RAF Marham

Site Allocations and Development Management Policies Plan (SADMP) (2016) Employment Allocations

The Core Strategy through Policy 'CS10 The Economy' states that some 66 hectares of employment land will be allocated over the plan period. The SADMP in line with this makes employment allocations for some 69 hectares worth of land.

Ref	Name	Area (Ha)	Status	2017-2018 Position	2018/19 & 2019/20 Position	2020/21 & 2021/22 Position	2022/23 & 2023/24 Position
E1.12 - HAR	Hardwick (King's Lynn)*	27	Completed	0	0	0.7	0.7
			Under Construction	0	0	0	0
			Permission	27	27	2	2.9
			No Permission	0	0	24.3	23.4
E1.12 - SAD	Saddlebow (King's Lynn)	23	Completed	0	0	0	0
			Under Construction	0	0	0	0
			Permission	0	0	0	0
			No Permission	23	23	23	23
F1.2	Land off St John's Way (Downham Market)	16.9~17	Completed	1.8	1.8	2.8	3.4
			Under Construction	0	0	0	0
			Permission	0.55	1.35	0.9	0.7
			No Permission	14.65	13.25	13.2	12.8
F2.5	Land south of Hunstanton Commercial Park (Hunstanton)	1	Completed	0	0	0	0
			Under Construction	0	0	0	1
			Permission	1	1	1	0
			No Permission	0	0	0	0
E2.1	West Winch Growth Area (Employment, West Winch)	1	Completed	0	0	0	0
			Under Construction	0	0	0	0
			Permission	0	0	0	0
			No Permission	1	1	1	1
			Completed	1.8	1.8	3.5	4.1
			Under Construct-ion	0	0	0	1
			Permission	28.55	29.35	3.9	3.6
			No Permission	38.65	37.8	61.5	60.2
			Complete %	2.6%	2.6%	5.1%	6%

* Previous outline permission for business, industrial and warehousing (12/01490/OM) for comprehensive development of site (granted December 2012) had lapsed by 2020/21 monitoring period.

The table above illustrates the progress regarding the Employment Allocations made by the Site Allocations and Development Management Policies Plan (SADMP) adopted 29 Sept 2016, in terms of site area (ha) delivered within allocated employment sites.

It is important to note that the adoption of the SADMP meant that the Employment Land Allocations made by the previous (1998) Local Plan which were 'saved' have been superseded, and therefore no longer form part of the Development Plan for the Borough. However, some of the 1998 Local Plan Employment Allocations were carried forward into the SADMP. These were also included in the replacement Local Plan, as submitted (March 2022).

E1.12 – HAR at King's Lynn

This site was previously allocated for employment uses in the 1998 Local Plan. 0.7ha of the site, east of St Andrew's Road, has been developed for small business units.

A previous outline permission was granted in December 2012 for employment use (business, industrial and warehousing), covering 25.3ha (of the 27ha allocation). This has since lapsed, although as of March 2024 there are extant planning permissions on parts of the site for the following:

- Supermarket and fast-food takeaway: 2ha; and
- Warehouse extension: 0.9ha (granted February 2024).

F1.2 at Downham Market

This was previously allocated for employment uses in the 1998 Local Plan albeit in a slightly different arrangement. Part of this site is an established business park as the name 'St John's Business Park' suggests. There is an access spine road in place and a number of businesses operating from this location. As of March 2024, 3.4ha (out of 16.9) was complete/ operational for business uses. There are extant permissions for various industrial and commercial units (total 0.7ha).

F2.5 at Hunstanton

This site was granted outline planning permission in February 2016 for a care home, up to 60 housing with care units and approximately 60 new dwellings with landscaping and vehicular access. This is in combination with the adjacent SADMP Residential Housing Allocation (F2.3). Hunstanton Town Council, prior to allocation, had promoted the employment allocation to potentially host a care home. The Borough Council accept that such a use on the site, having regard to the employment opportunities associated with such development and the level of identified need for such accommodation in the area, is acceptable. Detailed planning permission for the development of 61 housing with care apartments, 39 care ready bungalows and 60 dwellings was granted in August 2023, with construction commencing, late-2023/ early-2024.

Overall, the table shows that significant areas of land remain available within the SADMP Employment Allocations for future employment development. However, it is important to note that this isn't the full picture as beyond the allocations, there are existing and established areas of employment land. It is hoped in future reports a more comprehensive coverage of these sites can be provided.

Other significant/ major employment sites

In addition to 2016 SADMP allocations (total 69ha), a number of significant employment sites have come forward as windfall developments within or adjacent to the main urban areas, or through other such mechanisms. The most significant consented windfall employment sites (>5ha) are:

- Nar-Ouse Regeneration Area (NORA), King's Lynn (outline permission granted 2007) – main employment land area (including new healthcare hub), east of Nar Ouse Way currently under construction; and

- Bexwell Business Park, Downham Market (detailed planning permission granted 1996/1997) – phase 1 (3ha) of 23ha site already delivered, with extant consent for the remainder (20ha).

Further monitoring information in relation to employment land for King's Lynn & West Norfolk is published by Norfolk County Council and can be viewed via the link below:

<https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/monitoring-land-use-policies>.

DM11 - Touring and Permanent Holiday Sites

SADMP Policy ‘DM 11 – *Touring and Permanent Holiday*’ is primarily concerned with development of holiday uses and the intensification of holiday uses in the Norfolk Coast National Landscape area (formerly known as the Area of Outstanding Natural Beauty) and the Coastal Hazard Zone ((DM 18 – Coast Flood Risk Hazard Zone (Hunstanton to Dersingham)). Together, these zones (which have some overlap along The Wash coast) stretch from South Wootton/ Castle Rising to Holkham (North Norfolk District) within the Borough.

Of the developments in the table above, if any of these were in the National Landscape area, they would be judged after careful consideration and on balance be determined to be consistent with DM11 (and other policies within the Local Plan) and then could receive planning permission.

The key consideration in terms of DM11 and the National Landscape area is how this complements the Norfolk Coast AONB Management Plan 2019-2024 (Revised 2022)¹. The Management Plan is the statutory Plan for conserving and enhancing the natural beauty of the National Landscape area, under the Countryside and Rights of Way Act 2000. The application of this policy in decision making allows the objectives of the statutory Management Plan to be achieved through the planning system; with applicants required to demonstrate that proposals will not negatively impact on the landscape setting or scenic beauty of the National Landscape area.

Small scale proposals will not normally be permitted within the National Landscape area, unless they can demonstrate that the proposal will not negatively impact on the National Landscape area and its setting. It is important to note that applications for uses that would adversely affect Sites Special Scientific Interest (SSSI) or European Designated Sites will be refused permission, in all but the most exceptional circumstances.

The effectiveness of Policy DM11 is considered with reference to the following measures:

- Numbers of planning permissions granted for touring and holiday/ tourist accommodation (National Landscape area and Coastal Hazard Zone); and
- Numbers of planning permissions granted within National Landscape area and Coastal Hazard Zone citing DM11 as a reason for approval.

The second measure a new indicator, to demonstrate the overall application of Policy DM11 within the former AONB and Coastal Flood Risk Hazard Zone.

Indicator	2017/18	2018/19	2019/20	2020/21 & 2021/22	2022/23 & 2023/24
PP for Touring and permanent holiday sites granted	17	7	7	6	11

¹ <https://norfolkcoast.org/our-work/resources/ncp-management-plan/>

Indicator	2020/21	2021/22	2022/23	2023/24
No of planning permissions citing Policy DM11 (within National Landscape area/ Policy DM18 Coastal Flood Risk Hazard Zone)	2	8	11	7

Within the National Landscape area and Coastal Flood Risk Hazard Zone, since 2017 there were 48 planning permissions granted for touring and permanent holiday sites of various types/ descriptions. Of these, there have been 17 approvals since 1 April 2020. This compares to 28 planning permissions that cited DM11, granted since the 2019/20 monitoring period.

Of the consents since 1 April 2020, 2 planning permissions were granted for Touring and Permanent Holiday Sites were granted retrospectively, by way of lawful development certificates within the Coastal Hazard Zone.

New proposals should be in accordance with national policies on flood risk, not within the Coastal Hazard Zone, or within areas identified as Tidal Defence Breach Hazard Zone in the Borough Council's Strategic Flood Risk Assessment (SFRA), the Environment Agency's mapping and (where applicable) principal residences policies in made Neighbourhood Plans – Burnham Market, Heacham, Holme Next The Sea, Old Hunstanton, Sedgeford and Snettisham.

DM12 – Strategic Road Network

This policy aims to protect the Strategic Road Network within the Borough, comprising the A10, A17, A47, A134, A148, A149, A1101, A1122, outside the built-up areas of settlements specified within 'CS Policy CS02 The Settlement Hierarchy'.

In essence it looks to resist proposals for new development which directly access the Strategic Road Network which are not within defined settlements or are not for those sites allocated by the Local Plan.

However, new development served by a side road which connects a road forming part of the Strategic Road Network will be permitted provided that any resulting increase in traffic would not have significant adverse effect on the network (please see the full policy for criteria).

Sites with planning permission citing policy DM12 have been considered for the monitoring period:

- For the 2020/21 – 2021/22 monitoring periods, Policy DM12 was cited in 7 planning permissions; and
- For the 2022/23 – 2023/24 monitoring period, Policy DM12 was cited in 13 planning permissions; and

For monitoring, the measure for the effectiveness of Policy DM12 is whether planning permissions were found to be consistent with the policy. Although DM12 was a consideration in 20 applications during the monitoring periods (2020-2024), no planning permissions were granted that were found to be inconsistent with the policy.

DM13 – Railway Trackways

This policy seeks to protect existing and former trackways and routes by safeguarding them from

development which would prejudice their potential future use.

The following linear routes are included:

- Denver to Wissington,
- King's Lynn to Hunstanton, and
- Part of the former King's Lynn to Fakenham line from the West Winch Growth Area to the Bawsey/Leziate area.

The following routes within King's Lynn are also protected by the policy: Harbour Junction – Saddlebow Road, the east curve, and the docks branch line (except within the port area, as defined by Policy E1.2A).

Sites with new planning permissions (i.e. excluding variations of conditions, reserved matters) citing policy DM13 have been considered for the monitoring period:

- For the 2020/21 – 2021/22 monitoring period, Policy DM13 was cited in 8 planning permissions; and
- For the 2022/23 – 2023/24 monitoring period, Policy DM13 was cited in 9 planning permissions.

Of these planning permissions that cited Policy DM13, these all related to developments that adjoin the former rail routes, as a consideration in decision-making. Throughout the monitoring years since 1 April 2020, no planning permissions were granted for development that would conflict with this policy.

DM14 – Development associated with the National Construction College, Bircham Newton and RAF Marham

Policy DM14 aims to support the roles that the National Construction College (Construction Industry Training Centre), Bircham Newton and RAF Marham play as local employers and centres of excellence. This is through the support of proposals for new development which seeks to improve these facilities.

During the monitoring periods there have been no planning applications made on either site; the most recent planning permissions for each are noted as follows:

- CITC – Demolition of office building and construction of 3 new dwellings (consented September 2017); and
- RAF Marham – New air ground lighting masts for RAF Marham runway (consented July 2016).

Although it should be noted at RAF Marham significant construction work has taken place previously to accommodate its new fleet of jets. There is also considerable discussion which continues around the future of the CITB and its operation of the site at Bircham Newton going forward.

Other Employment Indicators²

Indicator and Description	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21 & 2021-22	2022-23 & 2023-24
Employment Rate Rate of 16-64 population (previously working age)	78.2%	78.4%	79.8%	81.2%	83.2%	78.5%	83.4%
Employment in SOC major group 1-3 % of 16+ population employed as managers and senior officials; professional occupations; associate professional & technical	38.6%	31.8%	42.9%	42.9%	34.9%	47.7%	42.3%
Employment in SOC major group 4-5 % of 16+ population employed as administrative and secretarial; skilled trades occupations	21.9%	22.3%	19.5%	17.2%	23.9%	19.1%	20.5%
Employment in SOC major group 6-7 % of 16+ population employed as personal service occupations; sales and customer service	18.3%	19.9%	17.3%	16.1%	18%	19.3%	15.1%
Employment in SOC major group 8-9 % of 16+ population employed as process and plant machine operatives; elementary occupations	21.2%	26.1%	19%	23.8%	23.1%	13.9%	22.1%
Earning by place of residents Gross weekly pay of all full-time workers	£497.90	£507.10	£516.50	£549.90	£559.40	£585.30	£650.60

The above data is taken from the office of national statistics, further and more detailed information is available via the following web site:

<https://www.nomisweb.co.uk/reports/lmp/la/1946157235/report.aspx>

Economy Conclusions

- The Economic figures are encouraging. The employment level in the Borough has improved from 78.5% to 83.4%, a reflection of the ongoing recovery from the Covid-19 pandemic (2020-22).
- Wages seem to have increased, reflecting recent increases to the living wage.
- Overall, there are significant areas of land available within the Local Plan employment allocations for future employment development to take place, with just 6% of the total area of employment land allocations developed (as of March 2024).

² Secondary data, collated by calendar year, rather than financial/ monitoring year; e.g. for 2015-16, the data relates to the January – December 2015 period and (most recently), for 2023-24 the data relates to the January – December 2023 period

- A small number of consents were granted that was considered contrary to policies DM11 and DM18 of the Local Plan during the 4-year monitoring period 2020-2024, a reflection of exceptional circumstances (in particular the Covid-19 pandemic) or improved effectiveness of the Enforcement service (prompting several approvals of lawful development certificates)

Society

Core Strategy Objectives:

- All communities are strong, cohesive and safe.
- Everyone receives quality services that meet their needs.
- Residents are active and engaged in their communities, helping to identify and respond to local needs, with cross boundary working as appropriate.
- Housing is focused in sustainable towns; in the rural areas local demand is targeted towards sustainable villages.
- All people are active and healthy.

Core Strategy Policies (2011):

- CS02 Settlement Hierarchy
- CS03 King's Lynn
- CS04 Downham Market
- CS05 Hunstanton
- CS06 Rural Areas
- CS07 Coastal Areas
- CS09 Housing
- CS12 Environmental Assets
- CS13 Community and Culture
- CS14 Implementation

Site Allocations and Development Management Policies (2016):

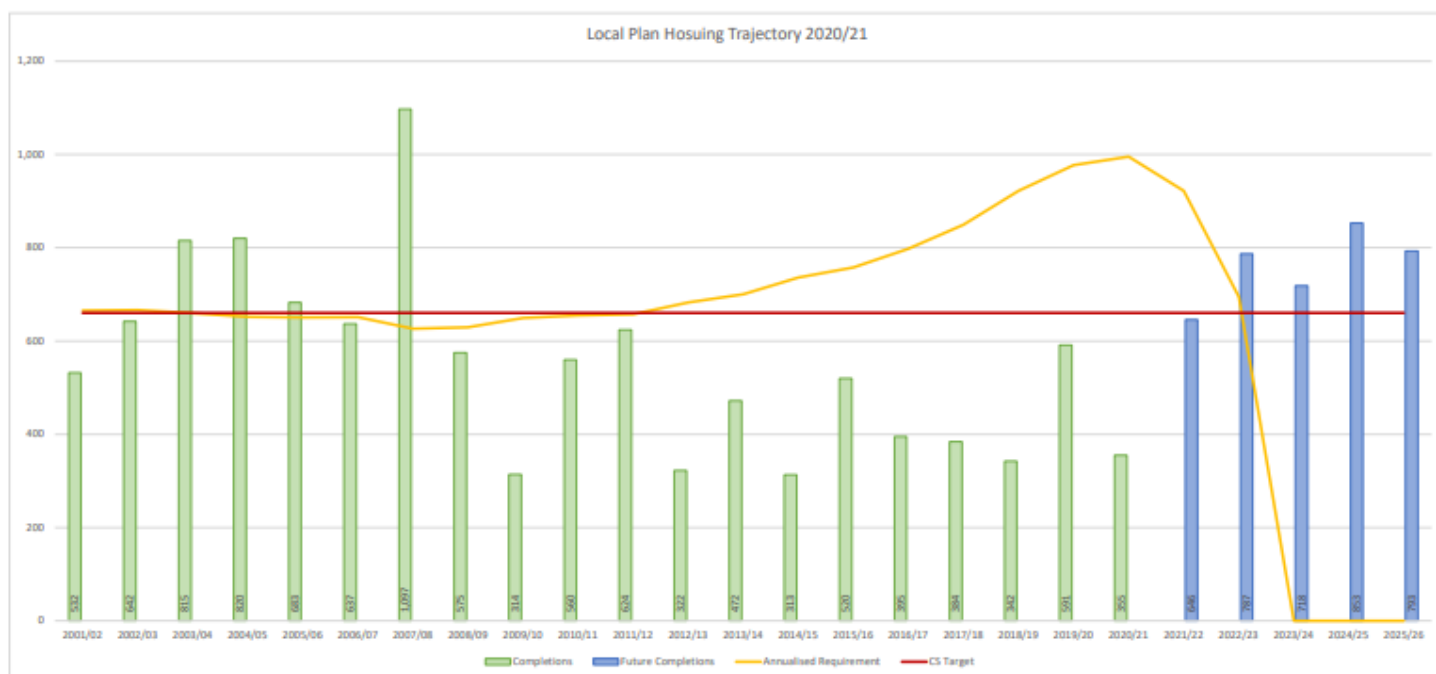
- DM1 Presumption in Favour of Sustainable Development
- DM2 Development Boundaries
- DM2A Early Review of Local Plan
- DM3 Development in the Smaller Villages and Hamlets
- DM4 Houses in Multiple Occupation
- DM5 Enlargement or Replacement of Dwellings in the Countryside
- DM6 Housing Needs of Rural Workers
- DM7 Residential Annexes
- DM8 Delivering Affordable Housing on Phased Development
- DM9 Community Facilities

Housing

2021 Housing Delivery Test

The Housing Delivery Test (HDT) results for 2021 were published on 14th January 2022 by the Department for Levelling Up, Housing and Communities (DLUHC); re-named the Ministry of Housing, Communities and Local Government (MHCLG), from July 2024. The results of the Housing Delivery Test confirmed that the Borough of Kings Lynn and West Norfolk achieved 96% and therefore no further action was required.

The 2020/21 Housing Trajectory is shown below:



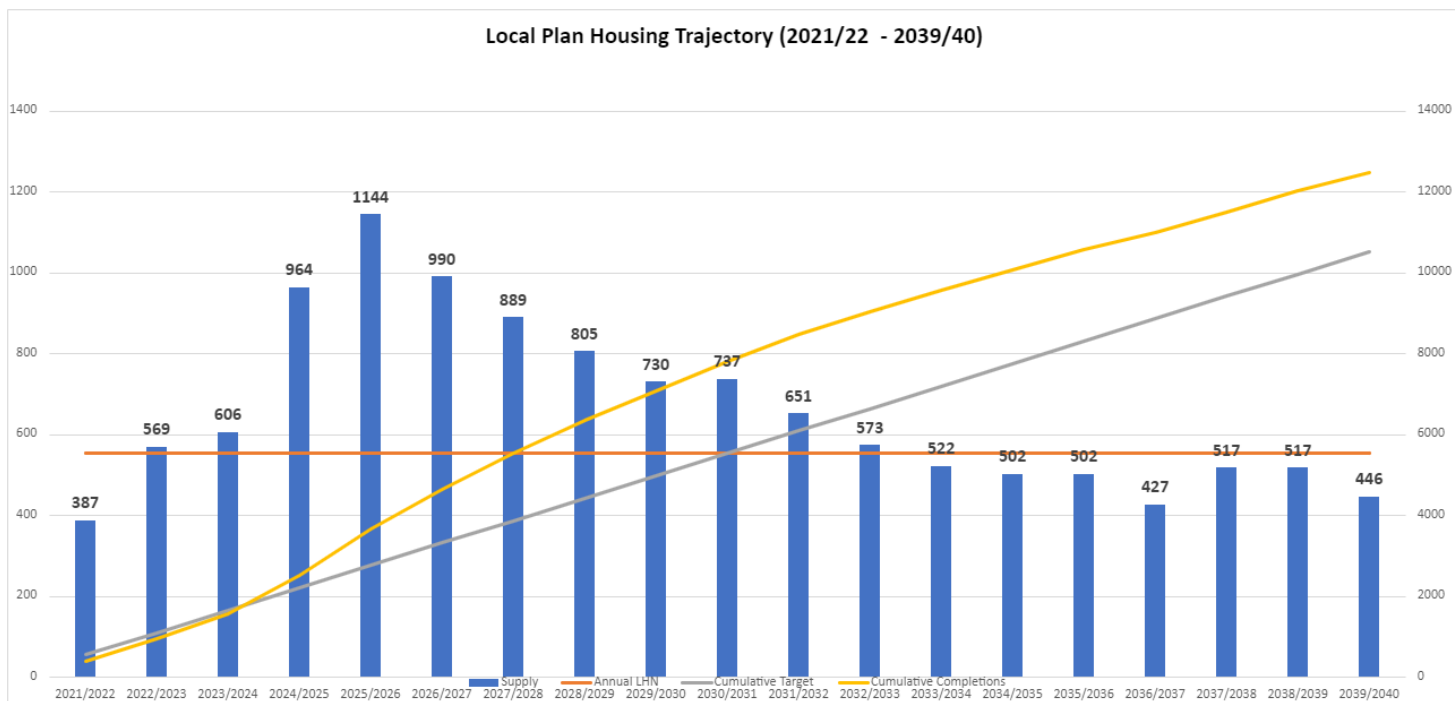
The trajectory graph plots the Borough-wide housing trajectory for the current Local Plan period (2001 to 2026). This is based on the annual completions to date (shown in green) and those dwellings identified for completion over the remainder of the plan period (shown in blue). In this graph, the annualised residual requirement (indicated via a yellow line) shows the annual average completion rate which should be sustained to the end of the plan period in order to meet the strategic requirement of housing completions set by the Core Strategy of 16,500 dwellings by 2026 (annualised as the red line). Although it should be noted that this ceased to be the baseline for calculating housing land supply beyond the 2020/21 monitoring period; after 5 years had passed since adoption of the SADMP in September 2016.

2022 Housing Delivery Test

The most recent HDT data was published by DLUHC on 19th January 2024. The latest results show that the Borough Council achieved 90%, a trigger for the preparation of a new HDT Action Plan. A new/ updated HDT Action Plan will be prepared separately and published in autumn 2024.

A new 2023/24 Housing Trajectory has been prepared, with reference to the emerging replacement Local Plan 2021-2040. This utilises the latest calculation for local housing need (LHN). The new trajectory is shown below:

Local Plan Housing Trajectory (2021/22 - 2039/40)



The revised trajectory utilises the latest (2024) local housing need figure (554 dwellings per year). This is the basis on which the replacement Local Plan is being examined. It shows both the cumulative target (@ 554 dwellings per year – grey line) and cumulative completions (yellow line) for the Plan period (2021-2024). Housing will need to continue to be delivered throughout the Plan period, to meet the LHN (10,526 dwellings). The trajectory graph indicates that the latest assessment of supply should allow the LHN/ replacement Local Plan requirement to be comfortably met by 2040.

Five Year Housing Land Supply

The table below provides the five year housing land supply calculation using a LHN of 554 dpa as of 2023/24, applying a 5% buffer as required by the NPPF.

LHN (554) x 5 (Years)	2,770
LHN x 5 + 5% and 20% buffers (NPPF scenarios)	2,909
Identified Supply (4,909) / LHN x 5 + 5% buffer	1.59
Above x 5 (Years)	7.9

Housing Delivery Test Results

As stated above, as of April 2024 the latest HDT data was published by the DLUHC in January 2024. The HDT is a monitoring tool the Government will use to demonstrate if local areas are building enough homes to meet their (local) housing need (LHN). It seeks to measure how many new homes have been delivered over the past 3 years against how many new homes should have been delivered over the same period. With the result expressed as a percentage. It is presented as a percentage of homes delivered against the number required over the past three years – with 95% constituting a ‘pass’. Results are published each year by Government. Further information can be found via the link below:

<https://www.gov.uk/government/collections/housing-delivery-test>

Year	Results	Actions Required	Action Taken
2018	91%	Action Plan	Action Plan prepared, agreed and published (August 2019)
2019	83%	Action Plan & 20% Buffer in land supply calculation	<ul style="list-style-type: none"> • Action Plan Update prepared, agreed and published (April 2020) • 20% Buffer included in calculation
2020	94%	Action Plan	Action Plan update prepared, agreed and published
2021	96%	None	None – 95% target achieved
2022 (latest, as of April 2024)	90%	Action Plan	Replacement Action Plan prepared, published and agreed (November 2024), incorporating indicative 2023 and 2024 HDT results

The table below concentrates on the completions only, and shows how many completions have taken place each year and provides a total too:

Financial Year	Dwellings Completed
2001/02	532
2002/03	642
2003/04	815
2004/05	820
2005/06	683
2006/07	637
2007/08	1,097
2008/09	575
2009/10	314
2010/11	530
2011/12	624
2012/13	322
2013/14	472
2014/15	313
2015/16	520
2016/17	395
2017/18	384
2018/19	432
2019/20	591
2020/21	340
2021/22	387
2022/23	569
2023/24	606
Total	12,600

Number of Dwellings Completed on Previously Developed Land

The Borough Council recognises the importance of making the best use of available sites across the borough. However, there is a need to balance development of greenfield sites with previously developed land (PDL) also referred to as brownfield land.

Most recently (2023/24), there were just over 600 dwellings (606) completed. Of these 215 were on previously developed land. This represents 35%. Of the 1,252 dwellings completed during the previous 3 monitoring years (2020-2023), 393 took place on previously developed land. This represents 32% of the dwellings completed over this period.

The table below compares the last 5 years' worth of data on this:

Indicator	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
% of Dwellings completed on PDL	42%	30%	32%	26%	42%	28%	35%

Affordable Housing Delivery

Indicator	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
Affordable Housing Delivery	29	61	63	50	49	72	79*

* In addition to 79 new affordable dwellings completed, a further 11 dwellings have been purchased by the Borough Council and returned to the affordable housing stock, increasing unit numbers to 90 affordable housing units created for the 2023/24 monitoring period.

Affordable housing delivery has shown steady increases, since the 2020/21 monitoring period. The highest numbers of units delivered since 2017/18 were completed, with over 70 units delivered during each of the 2022/23 and 2023/24 periods.

Gypsy & Traveller Pitches³

Indicator	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
New Pitch Provision	8	0	5	0	4	5	3

Custom and Self-Build Housing

The Government has set an ambition to significantly boost housing supply (NPPF section 5). There is recognition that certain sectors of house building could contribute more to delivery, given the right attention. One such sector which has been identified by the Government is Custom and Self-Build housing (C&SB).

C&SB housebuilding is defined as individuals or an association of individuals who either build or commission the build of their home. It can take several forms. The most common include: a contractor built one-off home, self-built one-off home, kit or package home and developer built one-off home.

The Self-build and Custom Housebuilding Act 2015, the Housing and Planning Act 2016 and Levelling Up and Regeneration Act 2023 place a duty on local authorities to keep a register of those seeking to acquire plots of land for self and custom build housing. The register is the definitive legal measure for defining need and the legislation places an obligation on local authorities to grant sufficient planning permissions for C&SB housing plots.

The legislation requires that the need, as identified in the register, would need to be met within three years. There is a three-year period given after each 'base' period to meet the need.

³ Delivery of Gypsy & Traveller pitches is measured by numbers of consents, given that in most cases these are approved retrospectively. Data was presented to the Local Plan examination hearing sessions, September 2024 ([K31 - Matter 6: BCKLWN Response to MIQs \(MIQ416 - MIQ462\)](#))

Base Period	Deadline for delivering need for each base period	No. on Register	C&SB Permissions Granted
1 (01/04/16 - 30/10/16)	30/10/19	53	60
2 (31/10/16 - 30/10/17)	30/10/20	50	66
3 (31/10/17 - 30/10/18)	30/10/21	48	61
4 (31/10/18 - 30/10/19)	30/10/22	40	49
5 (31/10/19 – 30/10/20)	30/10/23	41	40
6 (31/10/20 – 30/10/21)	30/10/24	82	40
7 (31/10/21 – 30/10/22)	30/10/25	32	28
8 (31/10/22 – 30/10/23)	30/10/26	17	18

Further information with regard to the Borough Council’s approach to Custom and Self-Build can be found via our Action Plan:

https://www.west-norfolk.gov.uk/info/20079/planning_policy_and_local_plan/721/custom_and_self_build_action_plan.

For more information regarding the register, please see the link below:

https://www.west-norfolk.gov.uk/homepage/279/custom_build_register_data.

Average House Prices

Indicator	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
Mean house prices at the end of Q4	£208,295	£215,612	£213,666	£216,105	£258,307	£278,252	£281,373

The average house price data is taken from land registry UK house price index, further information and data can be found via the link below:

<https://landregistry.data.gov.uk/app/ukhpi>

Policy DM2 – Development Boundaries

Policy DM2 seeks to direct new growth for higher order settlements within development boundaries, as defined by CS09 The Settlement Hierarchy and SADMP. The policy does outline exceptions to this, which are consistent with other policies within the Local Plan.

The table below shows the number of dwellings which were granted planning permission within the monitoring periods. This is only new permissions creating net additional dwellings. For example, consents for variations of conditions (i.e. already consented schemes), replacement dwellings and prior approvals are discounted.

Indicator	2020/21	2021/22	2022/23	2023/24
Total No. of Homes Granted Planning Permission within the Borough	757	935	879	854
Planning Permission for homes Granted Outside Development Boundaries	52	39	32	32
% Outside of Development Boundaries Granted Planning Permission	6.9%	4.2%	3.6%	3.7%

In 2020/21 – 2021/22, 91 new homes were granted permission at settlements which were outside of that development boundary. That is, 5.4% of all new homes consented.

In 2022/23 – 2023/24 64 new homes were granted permission at settlements which were outside of that development boundary. That is, 3.7% of all new homes consented.

The data for the 2020/21 to 2023/24 monitoring years demonstrates that the numbers and percentage of new homes consented outside development boundaries has diminished over the previous 4-years. It is also noted that this includes planning permissions granted for Rural Exceptions schemes, rural workers' housing or development within Smaller Villages and Hamlets (but excluding replacement dwellings). The latter do not have development boundaries, but consent may be granted if these

accord with Policy DM3 (below).

The Core Strategy (Policy CS09) defines the distribution of housing for the Borough. This sets a figure of 2% for Smaller Villages and Hamlets, and the countryside. Although the latest consent figures exceed this, it should be borne in mind that the Core Strategy pre-dates the NPPF (first version, March 2012, and subsequent updates), which permits the re-use of redundant or disused buildings in the countryside for housing (2023 NPPF, paragraph 84). This contrasts with pre-NPPF national planning policies.

Policy DM3 – Development in Smaller Villages and Hamlets

This policy is for lower tier settlements identified within the settlement hierarchy (CS09). These places do not have development boundaries in the current Local Plan, with decisions taken on a case-by-case basis with reference to Policy DM3 criteria. The policy allows for a modest amount of growth to take place in these designated smaller rural settlements.

The table below assesses the total numbers of homes granted planning permission in the defined Smaller Villages and Hamlets, compared to total numbers of permissions. The numbers relate to new planning permissions granted; i.e. excluding reserved matters, variations of conditions etc (for which planning permission is already extant), but excluding replacement dwellings. It can be seen below that the policy is allowing homes to come forward at these settlements as the policy intended; i.e. a mean average 2.2% proportion of total planning permissions granted.

Year	2020/21	2021/22	2022/23	2023/24
Total No. of Homes Granted Planning Permission within the Borough	757	935	879	854
Homes granted planning permission in Smaller Villages and Hamlets	22	27	16	10
% of all permissions	2.9%	2.9%	1.8%	1.2%

Policy DM4 – Houses in Multiple Occupation

This policy sets out the criteria for the conversion of existing and new developments which create a House in Multiple Occupation (HMO). This was introduced into the Use Classes Order as a separate category in 2010 (Use Class C4), which prompted the inclusion of a development management policy in the current Local Plan. The policy is monitored to assess the number of consents and locations. Monitoring data is derived from numbers of planning permissions citing Policy DM4.

Year	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
Permission	0	0	0	3	1	3
Location	n/a	n/a	n/a	King's Lynn (3)	Emneth (Wisbech) (1)	King's Lynn (3)

Policy DM5 – Enlargement or Replacement of Dwellings in the Countryside

Policy DM5 sets out the criteria for which this type of development will be acceptable. The purpose of monitoring the number of references made in planning consents is to assess any notable changes in the numbers of such development. Monitoring data is derived from numbers of planning permissions citing

Policy DM5.

Year	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
Replacement dwellings	Not recorded	8	8	21	21	16

Inevitably there are a significant number of replacement dwellings delivered, due to the Borough being predominantly a rural area. These are assessed against the Policy DM5 criteria. The most recent data shows an increase since 2019/20.

Policy DM6 – Housing needs of rural workers

This policy is monitored in order to assess the location of any new planning consents for agricultural occupancy dwellings, and for the removal / relaxation of agricultural occupancy conditions. Monitoring data is derived from numbers of planning permissions citing Policy DM6, with reference to:

- New and permanent occupational dwellings (DM6 criteria 1-3);
- Temporary occupational dwellings (DM6 criteria 4-5); and
- Removal/ relaxation of occupancy restrictions (DM6 criteria 6-7).

Year	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
New and permanent occupational dwellings	1	10	0	6	1	3
Temporary occupational dwellings	Not separately recorded	Not separately recorded	3	2	4	3
Removal/ relaxation of occupancy restrictions (existing occupational dwellings)	0	0	-3	-3	-3	-2
TOTAL	1	10	0	5	2	4

The data considers additional rural workers housing units created, and also the loss of units, by way of the removal or relaxation of occupancy restrictions (planning conditions). This demonstrates that during the monitoring period there has been no net loss of rural workers housing, with between 0 and 10 new units created since 2018/19.

Policy DM7 – Residential Annexes

Monitoring of this policy is carried out to assess the number of annexes granted planning permission and over time to review any notable patterns or changes. Monitoring data is derived from numbers of planning permissions citing Policy DM7, for the development or creation of a new residential annex.

Year	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
Annex No.	0	5	31	43	24	30

The number of permissions for residential annexes has increased significantly since the 2019/20 monitoring

period. The largest numbers of consents were granted during the 2020/21 and 2021/22 monitoring period. This may be a reflection of the Covid-19 pandemic and associated emergency legislation, whereby household mixing was severely curtailed and in response many property owners sought to bring extended family into their own households.

Policy DM9 – Community Facilities

Policy DM9 outlines that the Borough Council will encourage the retention of existing community facilities and the provision of new ones. Here we are looking to monitor how many consents have been given, for what type of community facility and where.

The policy’s definition of a community facility is broad ranging, the reporting attempts to categorise the types of development in a similar manner to the policy. The retention of a facility is judged by a positive change to the facility which assists in the facility being sustained, this could be through alteration, an extension or an improvement. DM9 could be monitored with reference to numbers of planning permissions citing the policy as a consideration in decision making (i.e. alterations, extensions or other improvements).

However, the real effectiveness of Policy DM9 should be assessed against the retention of community facilities. A survey of rural services and facilities was undertaken in 2016, to inform the Local Plan settlement hierarchy ([D21a - Further Consideration of the Settlement Hierarchy](#)) and submitted with the Local Plan in March 2022. This was followed by a 2023 update, which informed some revisions to the draft replacement Local Plan 2021-2040 settlement hierarchy, agreed through the independent examination ([F47a \(Appendix 1 Settlement Hierarchy Assessment\)](#)).

Policy DM9 has also functioned as a “hook” for Neighbourhood Plans; an enabling policy allowing Neighbourhood Plans to provide strengthened local protection for designated community facilities. Most “made” Neighbourhood Plans include policies for the protection of these defined facilities. The table below identifies relevant Neighbourhood Plan policies and the numbers of such facilities that have explicit community protection in this way (as of April 2024).

Neighbourhood Plan	Date "made"	Policy	No of community facilities/ services explicitly covered in Neighbourhood Plan policies
Burnham Market	Sep-23	Policy 13: Protection of Community Facilities	15
Gayton and Gayton Thorpe	Nov-23	Policy G25 – Community Facilities	7
Hunstanton	Jun-22	Policy M1 – Protection of Local Community Facilities	40
Old Hunstanton	Feb-24	Policy 5 Community Facilities	15
Sedgeford	Sep-19	Policy C1: Community Facilities	4
Stoke Ferry	Aug-23	Policy SF1 Community facilities	6
Terrington St John	Oct-21	Policy 6 – Village Services and Facilities	9
Thornham	Jul-21	Policy C1: New and existing community facilities	8
Tilney All Saints	Jul-21	6.1 Community Assets	2
Upwell	Jul-21	Community Infrastructure Policy P2: Primary School	1

Neighbourhood Plan	Date "made"	Policy	No of community facilities/ services explicitly covered in Neighbourhood Plan policies
Walpole Cross Keys	Oct-17	Policy 9 – Protection of Community Facilities	2
Watlington	Dec-23	Policy 8: Protection of community facilities	8
		TOTAL	117

Policy DM9 has enabled 13 Neighbourhood Plans, adopted since the 2016 SADMP, to designate nearly 130 local communities for protection.

Society Conclusions

- Over the most recent monitoring periods, 569 dwellings were completed in 2022/23 and 606 dwellings completed in 2023/24
- A significant proportion (in the region of 30%+) of these took place on previously developed land/brownfield land
- The Borough Council prepared, had agreed, and published a new Housing Delivery Test Action Plan, alongside this AMR
- A healthy five-year supply position (7.9 years) is demonstrated
- Policies have been effectively applied in managing development proposals in rural areas; e.g. with reference to rural workers housing or replacement dwellings
- Policies have allowed for community facilities and services to be designated and protected through the development plan (both DM9 and Neighbourhood Plans)

Environment

Core Strategy Objectives

- West Norfolk has undergone regeneration and growth that is well planned and complements its high historical and natural inheritance.
- Communities benefit from quality public spaces and parks with access to the coast and countryside that make the area special.
- West Norfolk is meeting the challenges of climate change and reducing mitigating carbon emissions.
- Public transport has improved, and people are less reliant on the motor car to access places and services.
- West Norfolk is still considered to be somewhere unique retaining its own local distinctiveness.

Core Strategy Policies (2011)

- CS02 Settlement Hierarchy
- CS03 King's Lynn
- CS04 Downham Market
- CS05 Hunstanton
- CS06 Rural Areas
- CS07 Coastal Areas
- CS08 Sustainable Development
- CS09 Housing
- CS11 Transportation
- CS12 Environmental Assets
- CS13 Community and Culture
- CS14 Implementation

Site Allocations & Development Management Policies (2016)

- DM15 Environment, Design and Amenity
- DM16 Provision of Recreational Open Space for Residential Developments
- DM17 Parking Provision in New Development
- DM18 Coastal Flood Risk Hazard Zone (Hunstanton to Dersingham)
- DM19 Green Infrastructure/Habitats Monitoring and Mitigation
- DM20 Renewable Energy
- DM21 Sites in Areas of Flood Risk
- DM22 Protection of Local Open Space

Air Quality

The Environment Act 1995, as amended by the Environment Act 2021 introduced the Local Air Quality Management (LAQM) system. LAQM is the statutory process by which local authorities monitor, assess and take action to improve local air quality against any of the air quality objectives. Where any of the objectives are exceeded and relevant public exposure, the local authority is required to declare an Air Quality Management Area (AQMA) and produce an Air Quality Action Plan (AQAP) with the remedial measures.

Air quality objectives are policy-based targets set by the Government. Some of the objectives are equal to the Gov'ts recommended standards such as the annual mean objective for nitrogen dioxide (NO₂). Others are based on interim WHO guideline limits such the recent particulate matter less than 2.5-micron (PM_{2.5}) targets as introduced by the Environment Act 2021. Responsibility for meeting the latter targets sits with national government; local authorities still have a role to play in delivering reductions in PM_{2.5}.

In terms of the annual mean objective for NO₂ (40 µgm⁻³), exceedances have resulted in two AQMA's in King's Lynn (for extent of areas see maps within Appendix D of Council's Annual Status Report 2022⁴). Both are related as they form along an arterial route through King's Lynn. Railway Rd AQMA is more a result of a street canyon type effect; whereas the Gaywood Clock AQMA is more to do with high volumes of traffic on each of the respective arms of the junction.

Air Quality Action Plan update

The source of the oxides of nitrogen (or NO_x) for both areas is from traffic, but whilst the proportion of NO_x from cars/taxis (LDV's) is the largest, almost half was from buses/coaches that arise from a smaller proportion of the total traffic flow. Given the presence of the AQMA's we are required to have an Air Quality Action Plan (AQAP) and we work with partners especially Norfolk County Council on these measures that target the main sources. The AQAP is being appraised to bring it more up to date as the last AQAP was adopted back in 2015.

As of March 2024, an update to the AQAP was well underway. This consists of the following projects/initiatives:

1. AQAP – Has been subject to recent consultation (January – March 2024: https://www.west-norfolk.gov.uk/info/20137/air_quality/1093/air_quality_action_plan_consultation) with a focus upon air quality within King's Lynn urban area, particularly the Air Quality Management Areas (https://www.west-norfolk.gov.uk/info/20137/air_quality/170/air_quality_management_areas):
 - Consultation has recently finished (spring 2024), and feedback is currently being collated and analysed
 - Summer 2024 – presentation of AQAP to Cabinet and Full Council, for adoption (including likely revocation of Gaywood Clock AQMA, due to significant air quality improvements in that location)
 - Will inform other emerging projects, with an emphasis on Particle Matter (PM) 2.5, a key measurement for air quality improvements (derived from 2021 Environment Act national targets – 35% reduction from 2018 PM2.5 baseline)
2. The emerging replacement Local Plan 2021-2040 proposes the development of a Borough-wide Air Quality Management Strategy. This will be developed once the Local Plan is adopted, in line with the National Air Quality Strategy⁵, focusing upon ecological matters.

⁴ BCKLWN, Annual Status Report 2022; https://www.west-norfolk.gov.uk/downloads/download/346/air_quality_information_documents

⁵ <https://www.gov.uk/government/publications/the-air-quality-strategy-for-england/air-quality-strategy-framework-for-local-authority-delivery>

Wider context

To help provide wider context to the AQAP, whilst traffic is principal source of the NO_x it is also the largest contributor to UK *domestic* greenhouse gas (GHG) emissions; responsible nationally for 27% in 2019 (DfT, 2021⁶) or 29% as shown within this Councils CO₂ emission inventory⁷. Domestic GHG emissions from transport have been broadly flat for the last 30 years (DfT, 2021⁶) when other sectors have declined. Improvements to engine efficiency within UK fleet and the roll out of electric vehicles will help but more needs to be done and which is reflected within the AQAP priorities.

The first priority is focussed on a range of interventions aimed at improved active travel/ modal shift especially as these measures will target the principal source of the NO_x (cars) and are traffic reduction based. They include measures such as workplace and school travel plans etc. Measures link to Local Cycling and Walking Infrastructure and Clean Connectivity Plans. Bus engine technology improvements and wider public transport (bus) service improvement measures are also a priority to tackle another important component of the NO_x emissions in the AQMA's. Bus improvements also support the active travel. The larger traffic management / infrastructure improvements planned for King's Lynn around the town centre and South Gates are also included in the draft AQAP as these too will similarly help to facilitate improved active travel.

An important part of the AQAP is also development control-led interventions especially as development will generally lead to additional traffic/emissions. By applying principles of best practice to mitigate and offset emissions where necessary in accordance with guidance (IAQM, 2017⁸) will help to improve air quality. As long as the AQMAs remain as designated they have lower significance thresholds to changes in traffic including those from cumulative effects. The Council's Annual Status Report on Air Quality provides a summary of the planning applications reviewed within the year and interventions. The exact detail of the proposed AQAP is still to be confirmed following its appraisal / consultation ahead of any adoption and final appraisal by Defra.

Air Quality Management Areas

As stated above, a review of the AQAP was launched in early 2024. This will be completed in autumn 2024 and will inform recommendations about the future of the designated AQMA's; London Road, Railway Road and Gaywood.

The current status of air quality is much improved with substantial reductions in NO₂ concentrations being observed within the first Covid outbreak year (in 2020) consistent generally with trends in NO₂ observed more widely⁹. The last exceedance in annual mean NO₂ was from Railway Rd AQMA in 2019. Since this period there has been around a 20% reduction in the annual mean NO₂ from monitoring results within the 2020 period; although trends for the 2021 year showed a slight increase in concentrations when compared to 2020 .

During the 2021 monitoring period all NO₂ results were less than 10% of the objective and an improvement when compared to previous years. NO₂ is monitored by two reference type analysers that give real-time data¹⁰ plus also indicative type diffusion tubes. These stations are focussed within the AQMA's but also extend out into the district to monitor changes. Air quality monitoring is also supported by traffic data with key road links monitored both by NCC and DfT.

⁶ DfT, Decarbonising Transport; A Better Greener Britain, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf

⁷ BCKLWN; Overview of 2018 District Emissions; https://www.west-norfolk.gov.uk/info/20095/energy_and_climate_change/920/west_norfolk_emissions

⁸ IAQM, Institute of Air Quality Management, 2017, Planning for Air Quality; <https://iaqm.co.uk/guidance/>

⁹ Defra, National Statistics, Concentrations of NO₂; <https://www.gov.uk/government/statistics/air-quality-statistics/nitrogen-dioxide#trends-in-concentrations-of-no2-in-the-uk>

¹⁰ BCKLWN AQ Real-time monitoring results; https://www.west-norfolk.gov.uk/info/20137/air_quality/171/air_pollution_levels

Particulate matter (PM) is also monitored with indicative type instruments situated either side of the docks in King’s Lynn and also next to a large industrial animal feed factory in Stoke Ferry.

When the AQAP update process has concluded (autumn 2024), recommendations will be made regarding the future status of the designated AQMA’s. The level of traffic rebound following the recovery period from Covid has continued to be closely monitored as part of the process of updating the AQAP. The updated (2024) Air Quality Annual Status Report, containing the latest monitoring data (up to 2023) has recently been published, in fulfilment of Part IV of the 1995 Environment Act (Local Air Quality Management), as amended by the Environment Act¹¹. This provides the latest Annual Mean NO₂ Monitoring results, from over 100 monitoring sites in:

- AQMAs – Railway Road and Gaywood Clock, King’s Lynn urban area;
- Other sites within King’s Lynn; e.g. Mill Fleet, Hardwick, The Walks, Town Centre, Nar Ouse Way, West Winch, Whitefriars, Wisbech Road
- Wisbech – Elm High Road (Emneth); and
- Industrial sites – King’s Lynn and Stoke Ferry.

This update for the Local Authority Monitoring Report is focussed on the AQMA’s (NO₂-based). The updated AQAP will be published by autumn 2024, and will outline actions needed to improve air quality in the Borough over the next 5-years (2024-2029). It will replace the previous AQAP that was adopted in 2015.

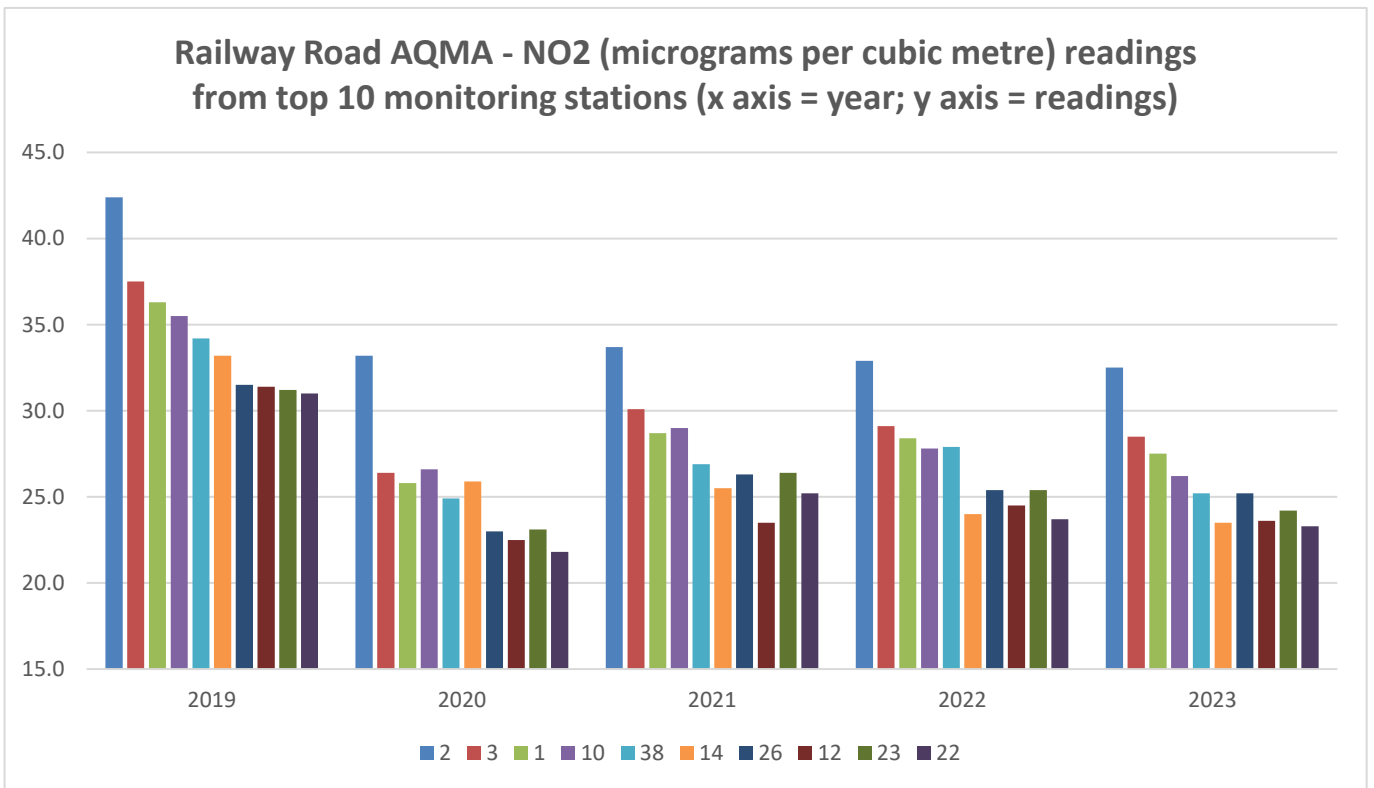
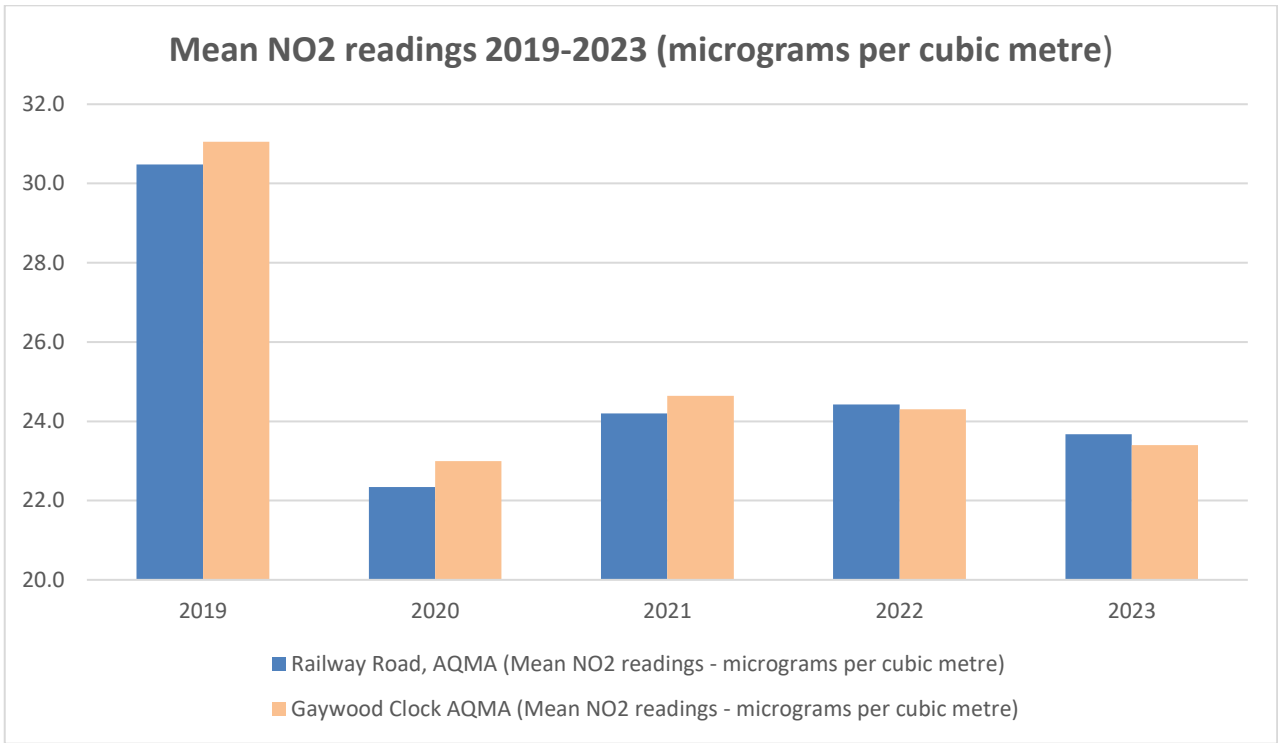
In addition, as of April 2024, there are 8x Smoke Control Areas designated in the King’s Lynn area¹² that require measures such as use of higher efficiency Defra exempt stoves when burning unauthorised fuels like wood. The controls are designed to prevent smoke emissions in these areas.

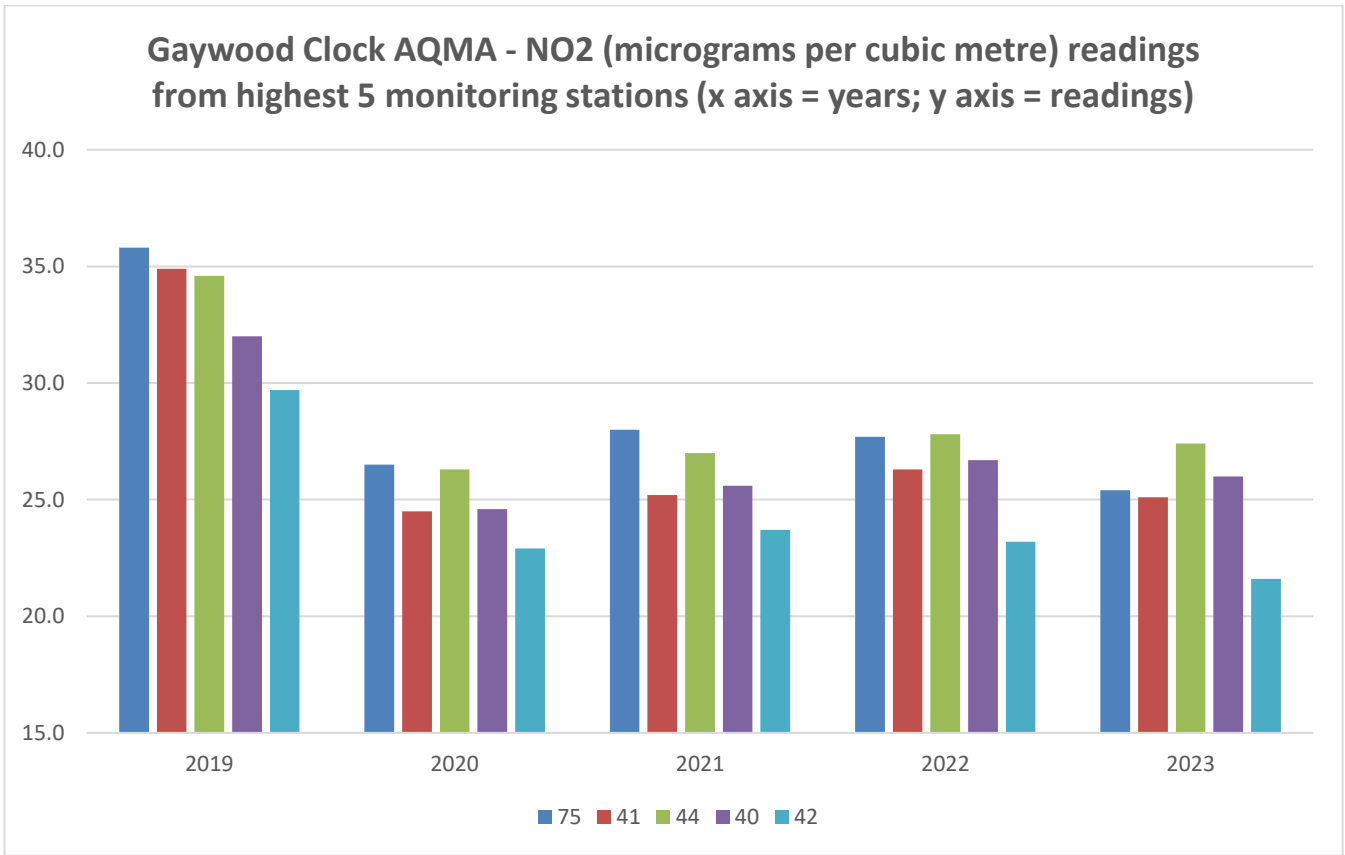
Data from the June 2024 Annual Status Report has been collated and summarised below. Indicative annual monitoring results from monitoring sites in the Railway Road and Gaywood Clock AQMAs are shown below, with mean average figures for each area shown in graph form.

	2019	2020	2021	2022	2023
Railway Road, AQMA (Mean NO₂ readings - micrograms per cubic metre)	30.5	22.3	24.2	24.4	23.7
Gaywood Clock AQMA (Mean NO₂ readings - micrograms per cubic metre)	31.1	23.0	24.6	24.3	23.4

¹¹ https://www.west-norfolk.gov.uk/download/downloads/id/8811/air_quality_annual_status_report_2024.pdf

¹² BCKLWN; Smoke Control Areas; https://www.west-norfolk.gov.uk/homepage/309/smoke_control_areas





The 2019-2023 data shows the stark reduction in NO₂ emissions between 2019 and 2020, as a result of the Covid-19 pandemic and associated lockdowns. Overall NO₂ emissions at all sites as lockdown restrictions were relaxed (2021-2022), but saw an overall reduction during 2023.

In summary, the LTP, this Council’s AQAP and monitoring (LAQM Annual Status Reports) will be the mechanism for improving air quality where transport has been identified as the cause. The strategic planning of development in the Local Plan (residential, employment, retail etc) and the development management process will also have an important role in limiting other air quality pollutants and carbon dioxide emissions in the Borough.

Flooding and Water Quality

The Environment Agency, as a statutory consultee, advises the Borough Council in decision making for planning applications with flood risk implications in the following locations:

- Coastal Risk Hazard Zone (Policy DM18);
- Fenland coastal/ marine flood risk areas;
- Fluvial flood zones 2, 3a and 3b for defined Main Watercourses (Burn, Hun, Great Ouse, Little Ouse, Nar, Old/ New Bedford Rivers, Wissey and various Fenland drains such as Cut Off and Methwold Lode¹³);

Flood risk management responsibilities for other watercourses is shared between the Lead Local Flood Authority (Norfolk County Council) and various Internal Drainage Boards (IDBs).

The Borough Council previously published details of cases where the Council granted planning permission contrary to Environment Agency advice, although no such data has been published since the 2019/20 monitoring period. The previous AMR cited that just 1 planning permission was granted in 2019/20, for which the Environment Agency had raised an objection during the 2019/20 monitoring year. However, since the 2019/20 monitoring period there are no details available for numbers of planning permissions granted contrary to Environment Agency advice.

Development Management officers have advised that in a small number of cases planning permission may have been granted in Fenland areas (<5 instances, during the 2020/21, 2021/22, 2022/23 and 2023/24 monitoring periods). Typically, these were due to changes to the Environment Agency's flood zone mapping and/ or site-specific flood risk evidence put forward as part of individual planning applications.

In such individual situations, it is suggested that the EA objection, officer report and formal decision are all read in full to understand the case-specific circumstances. These can all be found via the Borough Council Website (link below) and entering the planning application ref:

<https://online.west-norfolk.gov.uk/online-applications/search.do?action=simple&searchType=Application>

Flood Risk

Large parts of the Borough are at serious risk of flooding from fluvial and marine sources.

National policy and guidance regarding flooding is now contained within the National Planning Policy Framework and the associated national Planning Practice Guidance. The aim is to reduce the human and economic risks of flooding and the public costs of building and maintaining flood defences. This is supplemented by the Local Flood Risk Management Strategy, produced by the County Council (Lead Local Flood Authority)¹⁴.

In determining planning applications which have a flood risk issue, the Borough Council has to assess the level and types of flood risk; whether the flood risk can be made acceptable through mitigation measures, and whether the development has wider implications such as regenerating existing developed sites. In all cases where flood risk is an issue, the main consideration is whether the development will provide an adequate level of safety.

¹³ [https://www.west-norfolk.gov.uk/site/custom_scripts/static_content/strategic_flood_risk_assessment/additional_documents/Appendix B Watercourses.zip](https://www.west-norfolk.gov.uk/site/custom_scripts/static_content/strategic_flood_risk_assessment/additional_documents/Appendix_B_Watercourses.zip)

¹⁴ <https://www.norfolk.gov.uk/article/39041/Local-Flood-Risk-Management-strategy>

Strategic Flood Risk Assessment

The Council's Strategic Flood Risk Assessment (SFRA), together with the Environment Agency's tidal river hazard mapping and other data, broadly indicates the areas at risk of both fluvial and tidal flooding, and the level of that risk. This information will inform the approach to flooding issues in the Local Plan. In April 2017 a consortium of Norfolk local planning authorities, including the Borough Council, commissioned JBA Consultants to produce new Level 1 SFRA for each authority. The Level 1 SFRA was completed in November 2018. A more detailed Level 2 SFRA for the Borough was published in June 2019. Both documents were submitted with the replacement Local Plan, in March 2022.

An addendum to the Level 2 SFRA was produced in early 2024, regarding potential Gypsy and Traveller site allocations (January 2024):

https://www.west-norfolk.gov.uk/info/20216/local_plan_review_2016_-_2036/1097/level_2_sfra_addendum_gypsy_and_traveller_sites.

This SFRA addendum is being further updated (spring 2024), to accompany the proposed Local Plan site allocations for Gypsies, Travellers and Travelling Showpeople. This will be submitted as part of the ongoing Local Plan examination, in support of the proposed site allocations (summer 2024).

Environment Agency

The Environment Agency is a statutory consultee on planning applications involving flood risk. The Agency provides expert advice to the Council on flood risk issues, but it is up to the Borough Council to weigh this advice against wider considerations and national policy in making decisions on planning applications and the Local Plan.

Lead Local Flood Authority

Since April 2015 Norfolk County Council has been the statutory Lead Local Flood Authority (LLFA). The LLFA is a statutory consultee on major planning applications with regard to surface water drainage and ordinary watercourses, this includes the usage of sustainable drainage systems (SuDs) for the management of surface water.

Internal Drainage Boards

Many watercourses within the Borough are maintained by Internal Drainage Boards (IDBs). The statutory bodies have similar responsibilities to the LLFA.

Water Resources and Quality

The rivers of West Norfolk are a significant local geographic feature. The town of King's Lynn is at a strategic location at the mouth of the River Great Ouse, with the ability to reach far inland using linked waterway systems.

Threats to underground water reserves are becoming an increasing problem. Large areas of the Borough rely on underground water that is already over-extracted. Studies predict a further 20-40 per cent decline in recharge to the UK's aquifers over the next 20 years.

At the same time demand for water for crop irrigation in the UK is likely to rise by a third (International Association of Hydrogeologists, 2005). This has wider implications for water supply in connection with housing, agriculture, horticulture and industry.

In the last two years, water quality has become a significant issue of concern at a national level. The impacts of wastewater upon the nutrient quality of protected watercourses prompted Natural England to write to the Borough Council in March 2022, concerning nutrient pollution on protected watercourses (in the case of the Borough, the Wensum catchment). Full details are set out in the relevant web page:

https://www.west-norfolk.gov.uk/info/20000/planning_and_development/956/nutrient_neutrality.

The Government has recently produced updated state of the water environment for England. This evidence, based on national data collected in 2019, 2022 and 2023 is available to view on the relevant gov.uk web page:

<https://www.gov.uk/government/publications/state-of-the-water-environment-indicator-b3-supporting-evidence/state-of-the-water-environment-indicator-b3-supporting-evidence>.

Historic Environment

Conservation of the Built Environment

The importance of the built heritage of West Norfolk can be measured by the number of Conservation Areas and Heritage Assets such as Listed Buildings and Scheduled Monuments.

Historic Environment of West Norfolk							
	2018	2019	2020	2021	2022	2023	2024
Conservation Areas	43	43	43	43	43	44	44
Listed Buildings	1933	1933	1933	1933	1933	2008	2008
Scheduled Monuments	129	129	129	129	129	132	132
Historic Parks Gardens	6	6	6	6	6	6	6
Ancient Woodlands	23	23	23	23	23	23	23

A survey of Conservation Areas has been conducted through the production of Conservation Area Character Statements for the Borough, which identifies the priorities for enhancement schemes and improvements to Conservation Areas.

Since 2022, a new King's Lynn Conservation Area was designated (2023), while 75 new Listed Buildings (also referred to as "designated heritage assets") were designated through Historic England.

Listed Buildings

There are over 2000 structures in the borough which are listed as being of special architectural or historic interest. This figure has recently risen as Historic England has undertaken a project of listing many of the War Memorials within the Borough. Other recently listed buildings include a former Police Call Box and a Roman Catholic Church.

The Conservation Team give advice and guidance on the repair and maintenance of historic buildings in the borough including:

- design and planning advice on new developments affecting the setting of listed buildings
- securing the preservation and best use of historic buildings by taking action to prevent deterioration
- advice on the re-use of redundant buildings
- encouraging the use of 'in keeping' building materials, local crafts and skills
- advice on the protection and supply of traditional building materials

The Conservation Team also encourage and promote:

- historic building conservation
- environmental education
- an awareness of sustainable building practice

The Conservation Team give advice on works which required Listed Building Consent including:

- pre-application advice
- negotiation during the application process
- advice when schemes are being built.

In 2023, the Conservation Team dealt with 107 Listed Building Applications. This was an increase of 10 from the previous year.

Buildings at Risk

The Borough Council has a statutory obligation to preserve these designated heritage assets (Listed Buildings) and whilst the majority are in good order, there are some which are not.

The Borough Council does not compile a specific Listed Buildings at Risk Register. However, Historic England have a list of all Grade I, Grade II* and Scheduled Ancient Monuments which are at risk of being lost as a result of neglect, decay or inappropriate development. There are currently 25 buildings identified on this list within the Borough. They include 1 Conservation Area, 15 Grade I listed buildings (which include ecclesiastical buildings) four Grade II* and 5 Scheduled Ancient Monuments. Unfortunately, Historic England do not register any Grade II listed buildings or any non-designated Heritage Assets.

SAVE Britain's Heritage

The Borough Council also feeds into the 'SAVE Britain's Heritage' publication which highlights historic assets in need of substantial repair/refurbishment nationally. Currently there are 7 designated and undesignated heritage assets registered with SAVE within the Borough.

The Conservation Team offers advice to owners, developers and funders on the work needed to ensure the ongoing maintenance of these buildings, helps to find alternative uses if appropriate and, as a last resort, takes appropriate legal action to secure proper repair. Effectiveness can be measured by the number of buildings restored and thereby preserved by the identification of further buildings at risk.

Recently 2 Grade II* listed buildings on the HE Register have been purchased by new owners and are in the process of being repaired.

A listed building application and planning applications have been submitted for one Grade II listed building and 3 non designated heritage assets from the SAVE list.

Conservation Area Character Appraisals

There are 44 designated Conservation Areas in the Borough with King's Lynn being broken down into 5 distinctly different character areas. The figure was previously thought to be 43 but this has now been corrected. In accordance with National guidance and best practise, the Borough Council has produced character statements for all the Conservation Areas. Unfortunately, all of the character statements are becoming outdated and a lack of internal resources and funding has meant that these will not be updated in the foreseeable future.

Monitoring/Action

Continue to monitor all development in and affecting Conservation Areas. The Character Statements include reference to buildings of local interest which make a positive contribution to character. The merits of a policy relating to these buildings should be debated as part of the Local Development Framework.

Overall, there is significant pressure on the Borough Council to safeguard the historic environment but buildings at risk still represent a small proportion of the overall stock of listed buildings. A significant number of Conservation Area Character Appraisals have been completed.

- [Southgates Masterplan](#)

Biodiversity

The Borough Council's Key Role in Protecting Biodiversity

The Borough Council, like all public authorities, has a statutory duty to consider how to protect Biodiversity.

Development and land use changes may result in pressure on the area's biodiversity, the loss of which runs contrary to the aims and objectives of sustainable development. Therefore, the planning and development process has a fundamental role to play in removing or at least controlling some of the pressure. Failure to adequately address biodiversity issues may cause a planning application to be refused.

The Borough Council is represented on the Norfolk Coast Partnership, the Norfolk Biodiversity Partnership, The Brecks Partnership and The Wash and North Norfolk Marine Management Partnership. The Norfolk Wildlife Trust receives an annual grant from the Council to manage and enhance Roydon Common, an international site of importance for its nature conservation value.

The Core Strategy adopted July 2011 contains a policy (CS12) relating to Biodiversity and Geodiversity. The Council's Green Infrastructure (GI) Strategy, which highlights areas in the Borough which will benefit from habitat enhancement and creation, contains recommendations which will be implemented in line with the Core Strategy.

Under Article 6(3) of the Habitats Directive, local authorities have a duty to ensure that Local Plans have no adverse effect on European nature conservation sites (these include Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) along with Ramsar sites and are collectively known as European sites; formerly referred to as Natura 2000 sites). The Habitats Regulation Assessment (HRA) for the Site Allocations and Development Management Policies Plan (SADMP) concluded that the policies relating to the scale and location of growth had the potential to have a likely significant effect on European sites. Without avoidance and mitigation measures being put in place, there was a potential for there to be adverse effects on the integrity of SACs and SPAs/Ramsar sites. This would be a result of increased recreational pressures and to a lesser extent, urban development effects (such as vandalism).

Monitoring and Mitigation Strategy (2016-2022)

A Monitoring and Mitigation Strategy was prepared as the potential for adverse impacts on SACs and SPAs/Ramsar sites could not be ruled out.

The Natura 2000 Sites Monitoring and Mitigation Strategy was adopted in September 2015 setting out how the Council will address manage the impacts of development on European sites.

A Habitat Monitoring and Mitigation Payment (HMMP) from all residential developments was introduced from 1 April 2016 at a rate of £50 per house, later rising to £55. This payment/ tariff regime ended on 31 March 2022, when it was replaced by the Norfolk wide Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GI-RAMS).

Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy

The Norfolk Strategic Partnership subsequently commissioned the Norfolk wide GI-RAMS in 2018/19. This was set up as a Norfolk-wide initiative and culminated in the completion of the GI-RAMS mitigation strategy (March 2021):

https://www.west-norfolk.gov.uk/download/downloads/id/6629/norfolk_gi_rams_strategy_march_2021.pdf.

Implementation of the GI-RAMS formally commenced with the introduction of the new GI-RAMS tariff. This superseded the Habitat Mitigation Payment (levy) when it came into force in April 2022. The Borough Council has a dedicated team to manage the collection and recording of GI-RAMS tariff

incomes, while the partnership mechanism allows for monies to be spent on specific GI-RAMS mitigation projects.

Details of GI-RAMS incomes and outgoings the first two years since the commencement of GI-RAMS (1 April 2022 – 31 March 2024) are set out in the table below. The table also includes details of delayed Habitat Monitoring and Mitigation Payments (HMMP), for which contributions were agreed prior to 1 April 2022.

	GI-RAMS incomes	GI-RAMS incomes	GI-RAMS outgoings/ payments	Difference (surplus)
01/04/2022 - 31/03/2024	Norfolk GI-RAMS	£89,964.00		
	BCKLWN HMMP	£19,787.00		
	TOTAL	£109,751.00	£52,707.00	£57,044.00
01/04/2023 - 31/03/2024	Norfolk GI-RAMS	£146,253.00		
	BCKLWN HMMP	£11,634.00		
	TOTAL	£157,887.00	£26,357.00	£131,530.00
TOTAL SURPLUS				£188,574.00

The data demonstrates healthy levels of developer payments secured through GI-RAMS and its predecessor (HMMP). However, the build-up of nearly £190,000 of surplus over two years raises some concerns that GI-RAMS specific projects are not being rolled out sufficiently, compared to payments received.

Accordingly, around spring 2024, the Partnership (with Footprint Ecology) was working to produce a Recreational Impact Avoidance and Mitigation Strategy Action Plan. It is anticipated that this work will be published in summer 2024, with a view to refining the existing approach for recreation impacts to European sites, associated with plan-led housing growth, thereby enhancing the effectiveness of GI-RAMS.

Changes in priority habitats and species (by type)

Priority habitats and species which are deemed to be of high importance are incorporated into Habitat and Species Action Plans for Norfolk. Each species and habitat has its own management plan which is designed to set objectives and targets so that the specific habitats are managed, enhanced, protected and conserved to meet Norfolk’s Biodiversity Action Plan’s aims. These plans can be viewed on the Norfolk Biodiversity Partnership website: www.norfolkbiodiversity.org.

Regional/sub-regional

The Norfolk Biodiversity Action Plan (BAP) was developed in 1999 to translate national objectives, set by Government in response to commitments made at the 1992 Rio ‘Earth’ Summit, into local action. It contains clear targets and actions that specify what needs to be done, by whom, and when, to conserve Norfolk’s most rare and endangered animals, plants and habitats. The Biodiversity Partnership works together to ensure that these targets are being met. The BAPs, are overseen by the Biodiversity Coordinator for Norfolk and are divided into two groups, Habitat Action Plans (HAPs) and Species Action Plans (SAPs). As of April 2020, in Norfolk there were 22 HAPs and 56 SAPs which focus on identified habitats and species most at risk. The Norfolk Biodiversity Partnership has prepared Biodiversity Supplementary Planning Guidance, which the Council takes into account in considering planning applications.

National

Since 2020 the Government has introduced significant new legal obligations for biodiversity protection. These reflect the range of challenges that all aspects of the natural environment may face. Key initiatives that have been driven nationally are as follows:

- Nutrient Neutrality (March 2022) – Natural England’s intervention regarding Nutrient Neutrality now requires (within the Wensum catchment) applicants to demonstrate that proposals will not lead to adverse impacts with regard to nutrient pollution (https://www.west-norfolk.gov.uk/info/20000/planning_and_development/956/nutrient_neutrality).
- Biodiversity Net Gain (BNG) – Through the Environment Act (2021) the Government has introduced new BNG regulations. These stipulate that development must have a positive impact on biodiversity, which means that almost all new developments must be able to show that they result in more, or better quality, natural habitats than existed before the development took place. This requirement came into force on 12 February 2024 (https://www.west-norfolk.gov.uk/homepage/391/biodiversity_net_gain).

During the 2023-2024 financial year, the Borough Council appointed an ecologist, to provide in-house expertise about how can be properly implemented. This process will continue through the 2024-2025 monitoring period.

Renewable Energy

CS08 Sustainable Development outlines that the generation of energy from renewable sources will be supported and encouraged. DM20 – Renewable Energy defines the criteria against which applications for renewable energy will be considered. Where appropriate the aim of the policy is to support renewable energy schemes.

It is worth noting that renewable energy in the form of micro-generation can fall under permitted development rights and therefore the overall provision is likely to be higher than which has received a planning consent from the Borough Council. The tables below show significant consents granted for wind and solar power for the most recent monitoring periods.

2020/21 – 2021/22

Planning Ref.	Description
20/01508/FM	Installation of renewable led energy generating station comprising ground-mounted photovoltaic solar arrays and battery-based electricity storage containers (Walpole Substation Walpole Bank/Walpole Marsh)
20/01279/F	Freestanding solar panels (Land at Former RAF Methwold Brandon Road Methwold)
21/01432/FM	Erection of an up to 49.99 MW Solar PV Array and circa 15 MW battery storage, comprising ground mounted solar PV panels, battery storage...(Estuary Farm Edward Benefer Way King's Lynn)
21/02128/F	Ground mounted Solar PV panels on the edge of farmyard. System being 56 x 450W panels giving 25.2kWp. (Muckleton Farm Office Stanhoe Road Muckleton Burnham Market)
21/02302/FM	Proposed development of a ground mounted solar farm and associated infrastructure (Hall Farm 90 West End Northwold)

2022/23 – 2023/24

Planning Ref.	Description
22/00091/FM	Installation of underground cabling and associated electrical infrastructure to connect connected solar development (ref H18-1126_20) to the Walpole National Grid Substation (Land Southeast of Walpole Sub Station Walpole Bank)
22/01685/F	Erection of a new astronomy observatory, solar panel structure and visitor interpretation panel (Hunstanton Pitch and Putt Golf Course Road Hunstanton)
22/02018/F	Temporary Planning Permission for a period of 18 months for the installation of a horizontal vortex hydro turbine on the edge of the small sluice together with a floating solar array with wind turbine and associated works (Flood Protection and Sluice at Cut Off Channel Environment Agency Denver Complex Sluice Road Denver)
22/02021/FM	Erection of a Renewable Battery Energy Storage System and associated infrastructure including access and landscaping (Land Opposite Walpole Sub Station Walpole Bank)
23/00721/F	Planning permission to erect a 229.32kWp ground-mounted solar array (Frontier Agriculture The Grain Silo Saddlebow Road King's Lynn)
23/01881/F	Installation of 54.5kWp ground-mounted solar array to serve the irrigation pump (Land West of New Road Wormegay)
23/01908/F	Installation of 130kWp solar PV ground array for generation and consumption of electricity at the farm (Park Farm Castle Road Wormegay)

Planning Ref.	Description
23/02013/F	Installation and operation of a 52.9kW ground-mounted solar array (Agricultural Field Adjacent Sedgeford Hall Estate Fring Road Sedgeford)

Several significant renewable energy schemes have been consented since 2020. These vary greatly, between significant renewable energy schemes (e.g. new 49.99 MW Solar PV Array and circa 15 MW battery storage, Estuary Farm Edward Benefer Way King's Lynn; Walpole National Grid Substation) and other smaller scale projects serving single businesses, such 25.2kWp Muckleton Farm Office).

The list above is not exhaustive. In addition to the significant renewable energy schemes consented above, small scale/ minor householder, ancillary or single business renewable energy projects have also been granted planning permission. During the 2020/21 and 2021/22 monitoring periods, 3 small scale renewable energy projects were approved. By the 2022/23 and 2023/24 monitoring periods, the number of such projects given planning permission had increased to 20. These include rooftop solar panels (householder developments), renewable energy projects serving single businesses or infrastructure such as EV charging points.

DM Environment Policies

DM16 – Provision of Recreational Open Space for Residential Developments

Policy DM16 sets out the levels of open space to be delivered as part of a residential housing scheme. Please note what follows is a summary of the policy, in using this policy the full policy should be referred to within the SADMP (page 55). Schemes of 20 units or greater will provide 2.4 hectares of open space per 1,000 population, comprising approximately:

- 70% for either amenity, outdoor sport and allotment and
- 30% for suitably equipped children's play space
- Developments of 20-99 units will be expected to meet the requirement for suitably equipped children's play space only
- Developments of 100 dwellings and above will be expected to meet the whole requirement
- The policy is flexible:
 - Where it can be demonstrated that there is excess provision available
 - Where opportunities exist to enhance existing local schemes
 - The townscape or other context of the development

Typically, recreational open space is provided through s106 legal agreements, where necessary to make a scheme acceptable in planning terms. Developer contributions are negotiated through the development management process at outline or full permission stage and implemented through reserved matters and or variation of conditions.

Sites with full or outline planning permission citing policy DM16 have been considered for the monitoring period:

- For the 2020/21 – 2021/22 monitoring periods, Policy DM16 was cited in 9 planning permissions; and
- For the 2022/23 – 2023/24 monitoring periods, Policy DM16 was cited in 8 planning permissions.

Year	2020/21	2021/22	2022/23	2023/24
No of planning permissions triggering recreational open space requirements	4	5	4	4

Of the 17 permissions which triggered open space contributions during the monitoring period, two did not provide open space contributions. In both cases, this was due to on-site constraints, meaning that delivery of on-site open space in accordance with the requirements of Policy DM16 necessitated off-site contributions.

Policy DM18 – Coastal Risk Hazard Zone (Hunstanton to Dersingham)

This policy outlines the Coastal Risk Hazard Zone and states that new dwellings will not be permitted within the Zone. It also limits replacement dwellings (subject to criteria), extensions which increase the number people of risk to flooding, change of use which increase flood risk vulnerability. Finally, it states the seasonal occupancy which will be allowed. (Please see the SADMP for the full policy).

Sites with planning permission creating new dwellings (including replacement dwellings) or changing

occupancy conditions within the Coastal Risk Hazard Zone (policy DM18), have been approved during the monitoring period:

- For the 2020/21 – 2021/22 monitoring periods, 10 planning permissions for new dwellings or changes to occupancy conditions were granted; and
- For the 2022/23 – 2023/24 monitoring periods, 5 planning permissions for new dwellings or changes to occupancy conditions were granted.

Details of relevant planning permissions granted, with a brief commentary for each are set out below.

2020/21 – 2021/22

Planning Ref.	Description	Commentary
20/01265/FM, 20/01268/FM, 20/01269/FM	Temporary use of land for the siting of caravans for holiday occupation on an extended season between 6 th March and 6 th January (following year) up until and including the 31 st December 2022 (North Beach Caravan Park North Beach Heacham)	Extension of occupancy conditions during Covid-19 pandemic
20/01092/LDP	Lawful development certificate for the proposed use of land for the siting of holiday lodge caravans in place of the currently sited touring caravans	Retrospective permission by way of LDC
20/01455/F	Application Reference Number: Planning Reference DG55 Date of Decision: 12/07/2011. Condition Number(s): Period for which any holiday occupation is permitted is between 20 th March and 31 st October in any calendar year.	Amendment to occupancy conditions to address impacts of Covid-19 pandemic
20/01854/F	Demolition of Existing & Provision of Replacement Dwelling and All Ancillary Works.	Replacement dwelling, granted on appeal
21/00303/F	New farm house to serve Paper Hall Farm, including revised entrance track, new services and drainage	Rural workers dwelling
20/02097/FM	Temporary use of land for the siting of caravans for holiday occupation on an extended season up to and including 31 December 2022 (Searles of Hunstanton South Beach Road)	Extension of occupancy conditions during Covid-19 pandemic
21/02048/LDE	Lawful Development Certificate: Residential bungalow	Retrospective permission by way of LDC
22/00358/F	Proposed replacement dwelling, incorporating retention and alteration of existing substructure	Replacement dwelling

2022/23 – 2023/24

Planning Ref.	Description	Commentary
22/00683/LDP	Replacement static caravan/ holiday lodge sited under approval (06/00533/F) and 1968 Caravan Act.	Replacement caravan (equivalent to replacement dwelling)
22/00717/F	Proposed replacement dwelling, incorporating part retention, alteration and new substructure elements	Replacement dwelling
22/01664/F	Construction of replacement house, partial demolition of existing 1980s house, construction of replacement boathouse and new home office/gym, new access driveway and associated landscaping works	Replacement dwelling
22/01594/LDP	Replacement static caravan	Replacement caravan (equivalent to replacement dwelling)
24/00356/LDP	Application for a Lawful Development Certificate for proposed use of land to site 23 static holiday lodges.	Retrospective permission by way of LDC

During the during the monitoring period 2020/21 – 2023/24 15 planning permissions were granted for new/ replacement dwellings or changes to occupancy conditions within the Coastal Risk Hazard Zone. These permissions fall into the following categories:

- 5 planning permissions for changes to occupancy conditions during the 2020/21 – 2021/22 monitoring periods due to the Covid-19 pandemic (i.e. exceptional circumstances);
- 5 Lawful Development Certificates for new dwellings or tourist accommodation;
- 4 planning permissions for replacement dwellings; and
- 1 planning permission for a rural workers dwelling.

These small number of consents reflect the nuances of the planning system. Planning permission may be granted where an applicant can demonstrate a proposal fulfils the requirements of Policy DM18, or where there are exceptional circumstances (such as the Covid-19 pandemic) to justify granting planning permission.

Policy DM22 – Protection of Local Open Space

This policy outlines the Borough Council's approach to protecting such space. The Borough Council will seek to refuse planning permission that will result in the loss or restriction of access to locally important areas of open space. This is unless such loss can be offset by the replacement of equivalent or higher standard of provision or the wider benefits of allowing development to proceed outweighs the value of the site as an area of open space.

Sites with planning permission citing policy DM22 have been considered for the monitoring period:

- For the 2020/21 – 2021/22 monitoring period, Policy DM22 was cited in 7 planning permissions; and
- For the 2022/23 – 2023/24 monitoring period, Policy DM22 was cited in 4 planning permissions; and

Year	2020/21	2021/22	2022/23	2023/24
No of planning permissions citing DM22 re the protection of open space	3	4	3	1

During the monitoring period 2020/21 – 2023/24, 11 separate planning permissions cited DM22 in decision making. In all cases, it was concluded there was insufficient justification to refuse planning permission.

Policy DM22 also functions as a “hook” or enabling policy for Neighbourhood Plans to designate Local Green Spaces. Several “made” Neighbourhood Plans include designated Local Green Spaces. The table below identifies relevant Neighbourhood Plan policies and the numbers of such facilities that have explicit community protection in this way, as of April 2024.

Neighbourhood Plan	Date "made"	Policy	No Local Green Spaces designated through Neighbourhood Plans (as of April 2024)
Burnham Market	Sep-23	Policy 9: Local Green Spaces	10
Castle Acre	Feb-22	Policy NE:3 Local Green Spaces	2
Gayton and Gayton Thorpe	Nov-23	Policy G13 - Local Green Spaces	9
Holme Next The Sea	Apr-23	HNTS Policy 19: Local Green Space	4
Hunstanton	Jun-22	Policy J3 - Open Spaces, and Local Green Spaces	19
Old Hunstanton	Feb-24	Policy 15 Local Green Spaces	5
Sedgeford	Sep-19	Policy E3: Local Green Spaces	5
South Wootton	Jan-23	Policy E3 - Open spaces	3
Stoke Ferry	Aug-23	Policy SF15 Local Green Spaces	4
Thornham	Jul-21	Policy L2: Local Green Spaces	9
Tilney All Saints	Jul-21	Policy 3.3: Local Green Space	3
Upwell	Jul-21	Community Infrastructure Policy P4: Local green Spaces (LGS)	9
Watlington	Dec-23	Policy 6: Local Green Space	9
		TOTAL	91

As of April 2024, 91 Local Green Spaces were designated and other Neighbourhood Plans that have subsequently come forward (Grimston, Pott Row, Roydon & Congham, and Ringstead) will include further Local Green Spaces.

Environment Conclusions

- Air quality in West Norfolk has remained very good with the exception of the two AQMAs within the King's Lynn urban where, in common with many areas within the UK, the monitoring has continued to identify high levels of Nitrogen Dioxide (NO₂) due to road traffic. The Covid-19 pandemic and associated lockdowns has seen significant reductions in NO₂ emissions, since the 2019/20 monitoring period.
- There remains significant flood risk across extensive parts of the Borough. The Strategic Flood Risk Assessment is critical to development management decision making and Local Plan policy formulation. 1 planning permission was granted by the Borough Council against the advice of the Environment Agency during the 2019/20 monitoring period. There are no records for subsequent periods, although in a small number of cases (<5), planning permissions granted may have deviated from Environment Agency advice on the basis of current information (e.g. site specific flood risk assessments).
- There continue to be a number of designated heritage assets at risk, but these represent a small proportion of the overall stock of listed buildings. Conservation Area Character Appraisals have been completed for most existing designated areas. A Heritage Action Zone for the centre of King's Lynn was designated in 2017, which was followed by projects related to the King's Lynn Archaeological Database and wider regeneration projects associated with unlocking brownfield sites (2018-2022).
- Enabling policies (DM9, DM22), provide policy "hooks", allowing Neighbourhood Plans to make specific land-use designations (protected community facilities, Local Green Spaces). This has enabled "made" Neighbourhood Plans to designate over 200 such sites/ locations.

Replacement Local Plan 2021-2040 Progress

The Borough Council's current Local Plan comprises the Core Strategy (CS) (adopted in 2011) and the Site Allocations and Development Management Policies Plan (SADMP) (adopted in 2016). The CS sets the overarching planning policy framework for the Borough, with a plan period of 2001 to 2026. The SADMP provided housing allocations and more detailed development management policies to complement the CS.

As part of the examination process of the SADMP, the Inspector via a main modification to the SADMP recommended the inclusion of Policy DM2A. This committed the Borough Council to an early review of its Local Plan (both CS & SADMP). The purpose was to ensure that the most up to date policy framework, including deliverable housing sites, was in place to secure continuity for the longer term. The SADMP was adopted, including this policy, in September 2016.

Local Development Scheme

The Local Development Scheme sets out what individual Local Development Documents the Council will prepare, together with a timetable for their production. A Local Development Scheme (LDS) was first prepared in autumn 2016, to accompany preparation of a Local Plan review. The review was triggered by 2016 SADMP Policy DM2A, which expressly required the Borough Council to begin the review process in 2016.

The LDS has been subject to several subsequent updates as the Local Plan review progressed. Following submission of the Plan in March 2022, the LDS timetable was updated in June 2022, March 2024 and (most recently) April 2024, Local Plan examination.

The timetables outlined in the June 2022 LDS and March 2024 LDS and a key indicating the various stages of the local plan process are shown in tables below.

Local Plan Programme (June 2022 LDS)

Local Plan Documents	2021				2022				2023			
	Jan-Mar	Apr-Jun	Jul-Sept	Oct-Dec	Jan-Mar	Apr-Jun	Jul-Sept	Oct-Dec	Jan-Mar	Apr-Jun	Jul-Sept	Oct-Dec
Local Plan review (2016 – 2036)	A	A	B	C	C/D	E	E	E	E	E/F	G	H

Local Plan Programme (April 2024 LDS)

Local Plan Documents	2023				2024				2025			
	Jan-Mar	Apr-Jun	Jul-Sept	Oct-Dec	Jan-Mar	Apr-Jun	Jul-Sept	Oct-Dec	Jan-Mar	Apr-Jun	Jul-Sept	Oct-Dec
Local Plan review (2021-2040)	E	E	E	E	E	E	E	E	E/F/G/H			

	Key Stages of Local Plan Preparation	Regulation
A	Sustainability Appraisal Scoping Report Consultation (2016)	
B	Development of options – on-going engagement on issues and emerging options	
C	Publish and Consult on draft Local Plan	Regulation 18
D	Pre-Submission plan development	
E	Pre-Submission publication	Regulation 19 & 20
F	Submission of document to Secretary of State	Regulation 22
G	Examination (Including Hearing Sessions)	Regulation 24
H	Receipt of Inspector's Fact Check Report	
I	Receipt of final Inspector's Report	Regulation 25
J	Adoption	Regulation 26

The Local Plan timetable has seen significant changes since submission in March 2022. This is a function of the examination of the Plan undertaken by the Inspectors. The first round of hearings was held in December 2022 and January 2023. Following these, the Inspectors adjourned the examination to allow the Council to prepare and consult upon additional evidence, including the updated Gypsy and Traveller Accommodation Assessment (June 2023) and additional evidence relating to the spatial strategy, settlement hierarchy, transport, retail, housing land supply and West Winch Growth Area¹⁵. Consultation took place during September/ October 2023. This was followed by agreement with the Inspectors to reconvene the Local Plan examination hearings, which took place during March and April 2024.

The Gypsy and Traveller Accommodation Assessment (GTAA) required the allocation of additional site allocations, given that the quantum of need (identified at 102 Gypsy and Traveller pitches, for the period 2023-2039) required the allocation of additional land allocations. This required a multi-stage consultation, which broadly mirrored the Plan preparation process on an accelerated/ condensed timetable:

- September/ October 2023 – Consultation on GTAA, as newly published evidence
- November 2023 – Gypsy, Traveller and Travelling Showpeople “call for sites”
- January – March 2024 – Consultation on potential Gypsy and Traveller sites and policies (equivalent to Regulation 18 consultation)
- May/ June 2024 – Consultation on proposed Gypsy and Traveller Proposed Sites and Policy (equivalent to Regulation 19 consultation)

The Local Plan examination hearings concluded in April 2024, except for Gypsy, Traveller and Travelling Showpeople hearings which were scheduled to take place in September 2024.

The latest (April 2024) version of the LDS can be viewed online:

https://www.west-norfolk.gov.uk/info/20214/emerging_local_plan_review/500/local_development_scheme

¹⁵ https://www.west-norfolk.gov.uk/info/20216/local_plan_review_2016_-_2036/1070/consultation_on_additional_evidence_base_documents

Duty to Cooperate

The Localism Act 2011 imposed upon local planning authorities and others a 'duty to cooperate' on strategic planning matters (i.e. those that affect more than one planning authority area). The NPPF also gives guidance on statements of common ground between local planning authorities. This section outlines how the Borough Council has addressed that cooperation during the monitoring periods.

Neighbouring Planning Authorities

The Borough Council cooperates with its neighbouring local planning authorities in a range of planning matters of mutual interest. Particular focuses during the years under review were:

- Developing cooperation arrangements with Norfolk County Council, Breckland Council, Broadland District Council, Great Yarmouth Borough Council, North Norfolk District Council, Norwich City Council, South Norfolk Council and the Broads Authority. This includes the ongoing work involved with the Member Forum, with representation of each authority by a senior member, and the preparation of the Norfolk Strategic Planning Framework (NSPF) which also performs the function of a 'statement of common ground' between the authorities.
- The NSPF comprises a number of working groups which cover the following topics: Housing, Economy, Infrastructure, and Delivery. The NSPF reports to the Member Forum. The NSPF is a non-statutory document for the whole of Norfolk. The document outlines a series of agreements between all of the authorities including, shared objectives on housing, employment and infrastructure. The NSPF has been endorsed by all the relevant authorities and the final version was published in March 2018. It is anticipated that this will be reviewed in light of proposed changes to national planning policy. As part of this work the relevant authorities are considering further green infrastructure, the need for housing with care, 5G and fibre optic broadband, and jointly reviewing level 1 SFRA's (Strategic Flood Risk Assessments)
- Liaison with Fenland District Council and the Cambridgeshire and Peterborough Combined Authority to coordinate Local Plan allocation of sites in the Wisbech area. The main part of Wisbech is within Fenland District Council; however, the eastern fringes of the town are within the Borough of King's Lynn and West Norfolk.
- Coastal management issues with adjacent coastal authorities (North Norfolk District Council and South Holland District Council) through the Norfolk Coast Partnership and The Wash and North Norfolk Marine Management Partnership. The Borough Council is involved in two shoreline management plans. The North Norfolk Shoreline Management Plan 5: Old Hunstanton to Kelling Hard, was adopted in August 2011. The Wash Shoreline Management Plan (4): Gibraltar Point to Old Hunstanton was adopted in April 2010 and is being implemented through the East Inshore and East Offshore Marine Plans (April 2014), Wash East Coast Management Strategy (2015) and the Hunstanton Coastal Management Plan (2020).

Engagement with Public Health Norfolk, NHS trusts and Clinical Commissioning Groups through the Planning in Health Protocol, regarding healthcare infrastructure and wider public health and quality of life considerations. The current Protocol was adopted in August 2019¹⁶ and an updated version is anticipated to be completed by late-2024.

Cooperation mechanisms:

- Ongoing engagement through the Norfolk Strategic Planning Forum
- Ongoing engagement through the Habitat Regulation Assessment and Mitigation and Green

¹⁶ <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/partnerships/norfolk-strategic-planning-member-forum>

- Infrastructure coordination group
- Engagement with the A47 Alliance
- Engagement with the Ely Area Improvements Task Force (rail)
- Ongoing engagement through Norfolk Planning Officers Group
- Ongoing engagement with the Cambridgeshire and Peterborough Combined Authority
- Ongoing engagement with Fenland District Council regarding delivery of the East Wisbech urban extension.
- Informal discussions between planning policy officers on sites, development proposals and emerging issues with cross-boundary implications issues by telephone, email and meetings

Other ongoing engagement at officer level including:

- Norfolk Authorities Chief Executives
- Norfolk Strategic Services Group
- Norfolk Planning and Biodiversity Topic Group
- Norfolk Conservation Officers Group
- Greater Anglia LEP via Norfolk Growth Group
- Cambridgeshire & Peterborough Combined Authority Business Board (the LEP) / Mayor via Strategic Economic Planning Group
- Formal consultations on development plan documents, supplementary planning documents, and planning applications with potential cross-boundary implications.
- The Borough Council is a member, and sits on the management group, of the Norfolk Coast (Area of Outstanding Natural Beauty) Partnership.

Other relevant ‘Duty’ Bodies

Environment Agency: Long standing working arrangements (including joint projects) between the two organisations on a range of issues, especially on planning policies for flood risk zones (a major issue in parts of the Borough), flood defences, and Shoreline Management Plans, water quality, recreation, etc. Statutory and informal consultations, including representations on the Site Allocations and Development Management Policies plan process and the Local Plan review.

Historic England: Representations and advice on the Site Allocations and Development Management Policies plan process and the Local Plan review. In March 2017 King’s Lynn was awarded Heritage Action Zone status by Historic England. The aim of this is to ensure that new development works with historic Lynn and reinforces the economic, social and environmental vitality of the modern town. The project has researched the history of key sites in King’s Lynn, identify the most important historic buildings and areas, encourage the development of affordable well-designed homes reinforcing the character of the town, find new uses for underutilised space in the town centre and provide a programme of community events to get people involved in caring for, and enjoying, the town’s heritage. This was achieved via a partnership approach led by the Borough Council. The partners are: Historic England, Norfolk County Council, West Norfolk Chamber of Commerce, and King’s Lynn Town Centre Partnership & Business Improvement District.

Natural England: Representations and advice on the Local Plan review, particularly in relation to designated nature conservation sites and issues (e.g. stone curlews), and Habitats Regulations Assessments.

Civil Aviation Authority: No relevant strategic issues have arisen during the review period.

Office of Rail and Road: No relevant strategic issues have arisen during the period.

Homes England: Engagement with the strategic Local Plan allocation at West Winch for at least 1,600 dwellings in the current plan period (to 2026) and around 4,000 dwellings in the fullness of time (as

proposed in emerging Replacement Local Plan 2021-2040). Also, engagement through their ACP (Accelerated Construction Programme): approx. 10 sites owned by the Borough Council have been put forward.

Clinical Commissioning Group: Consultation and liaison. Engagement has been enhanced by the Norfolk Planning in Health Protocol. This is an engagement tool between Norfolk and East Suffolk Local Planning Authorities, Public Health Bodies and the Norfolk and Waveney Integrated Care System (ICS). The focus is upon delivering positive outcomes in terms of public health and wellbeing through the planning system.

A version was adopted in August 2019. The process of updating this commenced in 2022 and it is anticipated that the replacement Health Protocol will be adopted in late-2024.

Norfolk County Council: Advice and formal representations in relation to planning applications, submitted to the Borough Council, for strategic allocations within the Local Plan, in the following roles:

- Highway Authority;
- Strategic Transport;
- Infrastructure (e.g. Local Education Authority, libraries etc);
- Lead Local Flood Authority;
- Natural Environment;
- Historic Environment;
- Lead Local Flood Authority; and
- Minerals and Waste Planning Authority.

Marine Management Organisation: Engagement between the Borough Council and the Marine Management Organisation on the marine Plans, East Offshore and East Inshore, including relationship to the Site Allocations and Development Management Policies plan and emerging replacement Local Plan 2021-2040.

Neighbourhood Planning

The 2011 Localism Act introduced a new layer of plans which enable communities to shape development taking place in their local area. Preparation of Neighbourhood plans is led by the relevant parish or town council. The whole of West Norfolk is parished, with the exception of King's Lynn itself, where a neighbourhood forum or a number of forums covering different geographic areas of the town would have to be formed and approved in order for them to prepare any neighbourhood plans. Similarly, certain smaller villages and hamlets are represented by a parish meeting rather than a constituted parish council. To prepare a Neighbourhood Plan, parish meetings would need to become designated as a statutory neighbourhood forum or go into partnership with an adjacent parish council to prepare a joint Neighbourhood Plan.

The Borough Council has a duty to assist those communities who wish to create a plan for the future of their area. This function is primarily carried by the Borough Council's Planning Policy Team. They provide advice and assistance to those communities throughout the process. There has been considerable activity with regard to Neighbourhood Plan progress within the Borough during the motoring period.

The table below provides details of the made neighbourhood plans in force (as of April 2024):

Neighbourhood Plan	Date Made
Brancaster	January 2021 (review)
Castle Acre	February 2022
Burnham Market	September 2023
Gayton and Gayton Thorpe	November 2023
Heacham	June 2022
Holme-next-the-Sea	July 2021 (Part C review "made" April 2023)
Hunstanton	June 2022
Old Hunstanton	February 2024
Sedgeford	September 2019
Snettisham	November 2018
South Wootton	January 2023 (review)
Stoke Ferry	August 2023
Terrington St John	October 2021
Thornham	July 2021
Tilney All Saints	July 2021
Upwell	July 2021
Walpole Cross Keys	October 2018
Watlington	December 2023
West Winch & North Runcton	October 2018

As of April 2024, a further 3 Neighbourhood Plans had reached an advanced stage of preparation; i.e. submission under Regulation 15. The following Neighbourhood Plans are anticipated to go to referendum during the 2024-2025 monitoring period:

Neighbourhood Plan	Anticipated adoption date
Grimston, Pott Row, Roydon and Congham	August 2024
North Wootton	November 2024
Ringstead	February 2025

There are 39 parishes within the Borough that are designated Neighbourhood Areas. As of April 2024, 19 Neighbourhood Plans were "made", covering 20 parishes. For the latest information on Neighbourhood Planning within the Borough please see our webpage below:

https://www.west-norfolk.gov.uk/info/20127/neighbourhood_plans

Community Infrastructure Levy

The Community Infrastructure Levy (CIL) is a mechanism to allow local planning authorities to raise funds from new development, in the form of a levy, in order to contribute to the cost of infrastructure projects that are, or will be, needed to support new development.

The Borough Council's Community Infrastructure Levy charges took effect from the 15 February 2017 and the Council is both a Charging Authority and a Collecting Authority. Regulation 62 of the Community Infrastructure Levy Regulations 2010 (as amended) requires CIL Charging Authorities to produce an annual report detailing CIL income and expenditure and make it available before the 31 December each year.

Monitoring CIL obligations is undertaken using Google Earth, Planning Officers' site visits, and intelligence and knowledge provided by Parish Councils and/ or councillors. There is also a statutory "claw-back" period, following which the CIL team will work with Council Tax officers to secure tariff payments/ contributions. To date, the following has been secured through CIL:

- £2.4m monies collected
- 250 separate projects committed
- £4.4m allocated or committed.

The Borough Council's statutory annual financial reports are published on our website and can be accessed following the link below:

https://www.west-norfolk.gov.uk/info/20223/cil_financial_reports

Likewise, the Borough Council publishes its annual parish reports online as well:

https://www.west-norfolk.gov.uk/info/20223/cil_financial_reports/686/cil_parish_reports

Appendix – Collating monitoring information: data sources

Throughout the AMR, data sources need to be identified for specific information within the report. This Appendix explains the types of data and/ or information sought, the areas covered for each (spatial element) and the possible sources.

Policy ref	Policy name	Data/ information sought	Spatial element	Period	Likely source
	Economy				
CS10	The Economy	Progress in delivering employment site allocations and significant employment land windfalls	King's Lynn (including West Winch); Downham Market; Hunstanton	01/04/2020-31/03/2024	GIS filter and Uniform report
DM11	Touring and Permanent Holiday Sites	No of planning permissions citing DM11	Coastal Change Management Area and National Landscape Area (formerly AONB)	01/04/2020-31/03/2024	GIS filter and Uniform report - No of consented touring/ permanent caravan sites
DM12	Strategic Road Network	No of planning permissions citing DM12/ along strategic routes	A10, A17, A47, A134, A148, A149, A1101, A1122, outside development boundaries	01/04/2020-31/03/2024	GIS filter and Uniform report
DM13	Railway Trackways	No of planning permissions citing DM13/ bisecting former railway tracks	King's Lynn routes; Denver - Wisington; King's Lynn - Hunstanton; Hardwick - Gayton Road;	01/04/2020-31/03/2024	GIS filter and Uniform report
	Society				
	Affordable Housing Delivery	No of affordable units completed	Borough-wide	01/04/2020-31/03/2024	Strategic Housing
DM2	Development Boundaries	No of planning permissions granted outside SADMP development boundaries	Rural areas (as defined by development boundaries)	01/04/2020-31/03/2024	GIS filter and Uniform report

Policy ref	Policy name	Data/ information sought	Spatial element	Period	Likely source
DM3	Development in Smaller Villages and Hamlets	No of housing completions in SVH parishes	Anmer; Bagthorpe; Barton Bendish; Barwick; Bawsey; Boughton; Burnham Norton; Burnham Thorpe; Choseley; Congham; Crimplesham; East Walton; Fordham; Fring; Holme NTS; Little Massingham; Houghton; Nordelph; North Creake; North Runcton; Pentney; Ringstead; Roydon; Ryston; Downham West; Shernborne; Shouldham Thorpe; South Creake; Stow Bardolph; Stanhoe; Titchwell; Tottenham; West Acre; West Dereham; West Rudham; Wretton	01/04/2020-31/03/2024	GIS filter and Uniform report/ housing trajectory
DM4	Houses in Multiple Occupation	No of planning permissions for C4 use class	Borough-wide	01/04/2020-31/03/2024	Uniform report
DM5	Enlargement or Replacement of Dwellings in the Countryside	No of planning permissions for replacement dwellings	Rural areas (as defined by development boundaries)	01/04/2020-31/03/2024	Housing trajectories
DM6	Housing needs of rural workers	No of planning permissions citing Policy DM6	Rural areas (as defined by development boundaries)	01/04/2020-31/03/2024	Uniform report/ Planning Committee reports
DM7	Residential Annexes	No of planning permissions citing Policy DM7	Borough-wide	01/04/2020-31/03/2024	Uniform report
	Environment				
n/a	Flooding and water quality	No of planning permissions granted, contrary to EA advice	Borough-wide	01/04/2020-31/03/2024	Uniform report/ committee reports
n/a	Conservation of the Built Environment	No of designated Conservation Areas; Listed Buildings; Scheduled Monuments; Historic Parks; Ancient Woodlands		2023-2024	Principal Conservation Officer
n/a	GI-RAMS	Income through GI-RAMS tariff	Borough-wide	01/04/2022-30/03/2024	Office Manager

Policy ref	Policy name	Data/ information sought	Spatial element	Period	Likely source
CS08/DM10	Renewable Energy	Details of planning permission for renewable energy projects	Borough-wide	01/04/2020-31/03/2024	Uniform report/ committee reports
DM16	Provision of Recreational Open Space for Residential Developments	No of planning permissions granted that do not deliver policy obligations	Borough-wide	01/04/2020-31/03/2024	Uniform Reports/ S106 agreements
DM18	Coastal Risk Hazard Zone (Hunstanton to Dersingham)		Coastal Change Management Area	01/04/2020-31/03/2024	GIS filter and Uniform report - No planning permissions granted within CCMA
DM22	Protection of Local Open Space	No of planning permissions granted citing DM22	Borough-wide	01/04/2020-31/03/2024	Uniform Reports/ S106 agreements