

BOROUGH COUNCIL OF KING'S LYNN AND WEST NORFOLK

LOCAL PLAN 2021-2040

SUSTAINABILITY APPRAISAL ADOPTION STATEMENT

27th March 2025

Contents

1	Purpose of this Document	4
2	Introduction and Context.....	4
3	Background to the SA process in King's Lynn and West Norfolk	6
4	The preferred strategy and options for the King's Lynn and West Norfolk Local Plan	11
5	Consultation and Response to Main Modification Representations	14
6	Measures to be taken to monitor the significant environmental and sustainability effects caused by the implementation of the Local Plan	16
7	Availability of Adoption Documents	18
	Appendix A: Monitoring and Delivery Framework.....	19
	Appendix B: Further Information on Document Access	36

BOROUGH COUNCIL OF KING'S LYNN AND WEST NORFOLK LOCAL PLAN 2021-2040 SUSTAINABILITY APPRAISAL ADOPTION STATEMENT

Notice of the adoption of the King's Lynn and West Norfolk Local Plan 2021-2040 in accordance with The Planning and Compulsory Purchase Act 2004 (as amended) The Town and County Planning Act (Local Planning) (England) Regulations 2012 (as amended) and the Environmental Assessment of Plans and Programmes Regulations 2004 is hereby given that (in accordance with above-mentioned legislation) Borough Council of King's Lynn and West Norfolk formally adopted the King's Lynn and West Norfolk Local Plan 2021-2040, with its accompanying Environmental Report (including Habitat Regulations Assessment) at a full council meeting on 27th March 2025.

Prepared by Capita Plc on behalf of the Borough Council of King's Lynn and West Norfolk.

Borough Council of
**King's Lynn &
West Norfolk**



 **Capita**

1 Purpose of this Document

1.1 In accordance with Article 9 of Directive 2001/42/EC, this Sustainability Appraisal Adoption Statement responds to the adoption of the Borough Council of King's Lynn and West Norfolk's Local Plan 2021-2040 (27th March 2025) and satisfies its post adoption (Stage E) requirements for Sustainability Appraisals (SA)/ Strategic Environmental Assessment (SEA) by:

- Summarising how environmental (and sustainability) considerations have been integrated into the Plan.
- How the SA has been taken into account during the preparation of the Plan.
- How opinions expressed through public and other consultations have been taken into account.
- The reasons for adopting the plan in the light of other reasonable alternatives.
- Setting out the means of monitoring the plan

1.2 This Sustainability Appraisal Adoption Statement also confirms that the Local Plan 2021-2040 fulfils the requirements of Article 6(3) of the EU Habitats Directive and Conservation of Habitats and Species 2017 (as amended). The Habitats Regulation Assessment (HRA) was undertaken with regard to the Conservation Objectives of European Sites, and with reference to other plans and projects that could give rise to any potential significant effects for any European Site.

2 Introduction and Context

2.1 According to Planning Policy Guidance (PPG)¹, a Sustainability Appraisal (SA) is 'a systematic process that must be carried out during the preparation of local plans and spatial development strategies', with the purpose of promoting sustainable development by, 'assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.' Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) requires a Local Planning Authority to make the final SA report available alongside the adopted Local Plan.

¹ Paragraph: 001 Reference ID: 11-001-20190722

- 2.2 Carrying out a SA is a means of determining the most important environmental, social and economic factors in relation to an area, and testing the emerging planning policy document against those, with the aim of assessing the plan and seeking ways in which it might be improved or mitigated. It is intended to be applied as an iterative process which informs the development of the plan, carried out as a series of stages as the plan is developed over time.
- 2.3 The Planning and Compulsory Purchase Act (sections 19 and 39) requires local authorities to carry out SAs during plan preparation with the objective of contributing to the achievement of sustainable development. Strategic Environmental Assessments (SEA) are incorporated into the requirement for completing SAs. This is reiterated in the National Planning Policy Framework (NPPF). Both the SA and SEA requirements were met through a single integrated process (referred to as SA), with the method and findings described and updated in a number of SA reports, published on the Council's website².
- 2.4 The Borough Council of King's Lynn and West Norfolk's (BCKLWN) Local Plan 2021-2040 was adopted 27th March 2025 and has been subject to a continuous SA and SEA process. All of these documents can also be found at the Council's online examination library and / or on the Council's website in association with the various stages of preparation for the plan³.
- 2.5 The King's Lynn and West Norfolk Local Plan was also required to be subject to Habitats Regulations Assessment (HRA) under the Conservation of Habitats and Species Regulations 2017 (as amended). The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European designated site for nature conservation and to ascertain whether it would adversely affect the integrity of that site.
- 2.6 The HRA process for the Local Plan was undertaken and reported on separately from the SA although the HRA conclusions were reflected in the SA where relevant. The submission version HRA Report that was submitted alongside the Local Plan for Examination, was prepared by Footprint Ecology on behalf of the Borough Council in May 2021. Footprint Ecology then considered the implications of the proposed Main Modifications (MM) for the HRA findings reported previously. They concluded that the Main Modifications did not change the conclusions of the May 2021 HRA Report, which were that

² [Sustainability Appraisal | Sustainability Appraisal | Borough Council of King's Lynn & West Norfolk](#)

³ [Local Plan review \(2021-2040\) plan-making stages | Local Plan review \(2021-2040\) plan-making stages | Borough Council of King's Lynn & West Norfolk](#)

no adverse effects on integrity will occur at any European sites as a result of the Local Plan, either alone or in combination with other plans or projects.

3 Background to the SA process in King's Lynn and West Norfolk

- 3.1 Promoting sustainable development is at the heart of the National Planning Policy Framework (NPPF). It is worth noting that the Plan was examined against the 2021 version of the NPPF, as was in place at the time the Plan was submitted for examination. The NPPF states that 'the purpose of the planning system is to contribute to the achievement of sustainable development'. Therefore, the planning system must work towards providing economic, social and environmental gains through guiding development.
- 3.2 The NPPF states that 'Local plans and spatial development strategies should be informed throughout their preparation by a Sustainability Appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)'.
- 3.3 Furthermore, the PPG states that the Sustainability Appraisal is, 'a systematic process that must be carried out during the preparation [of a Local Plan]. Its role is to promote sustainable development by assessing the extent to which the emerging plan ... will help to achieve relevant environmental, economic and social objectives'. The process ensures that the 'proposals in the plan are appropriate given the reasonable alternatives' and supplies the justification and reasoning behind the preferred options carried forward in the Local Plan
- 3.4 SEA identifies the environmental implications of the introduction of a Plan. Although the requirements for a SEA are distinct from those for SA, they can overlap substantially in terms of process and content. Sustainability Appraisals incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the 'Strategic Environmental Assessment Regulations'). Therefore, the required SEA has been integrated into the SA. Whilst the SEA looks at the environmental impacts, the SA also looks at the wider economic and social impacts. Fundamentally, the SEA involves the production of an Environmental Report which is incorporated within the SA and accompanies the Local Plan.

- 3.5 SA is an iterative process and the five stages to the SA process are set below. Through the SA process, it is possible to highlight the sustainability implications of the policies and site allocations, as well as the spatial strategy. This Adoption Statement fulfils Stage E, post adoption reporting and monitoring, and it reflects on the process of completing the SA over the previous four stages.

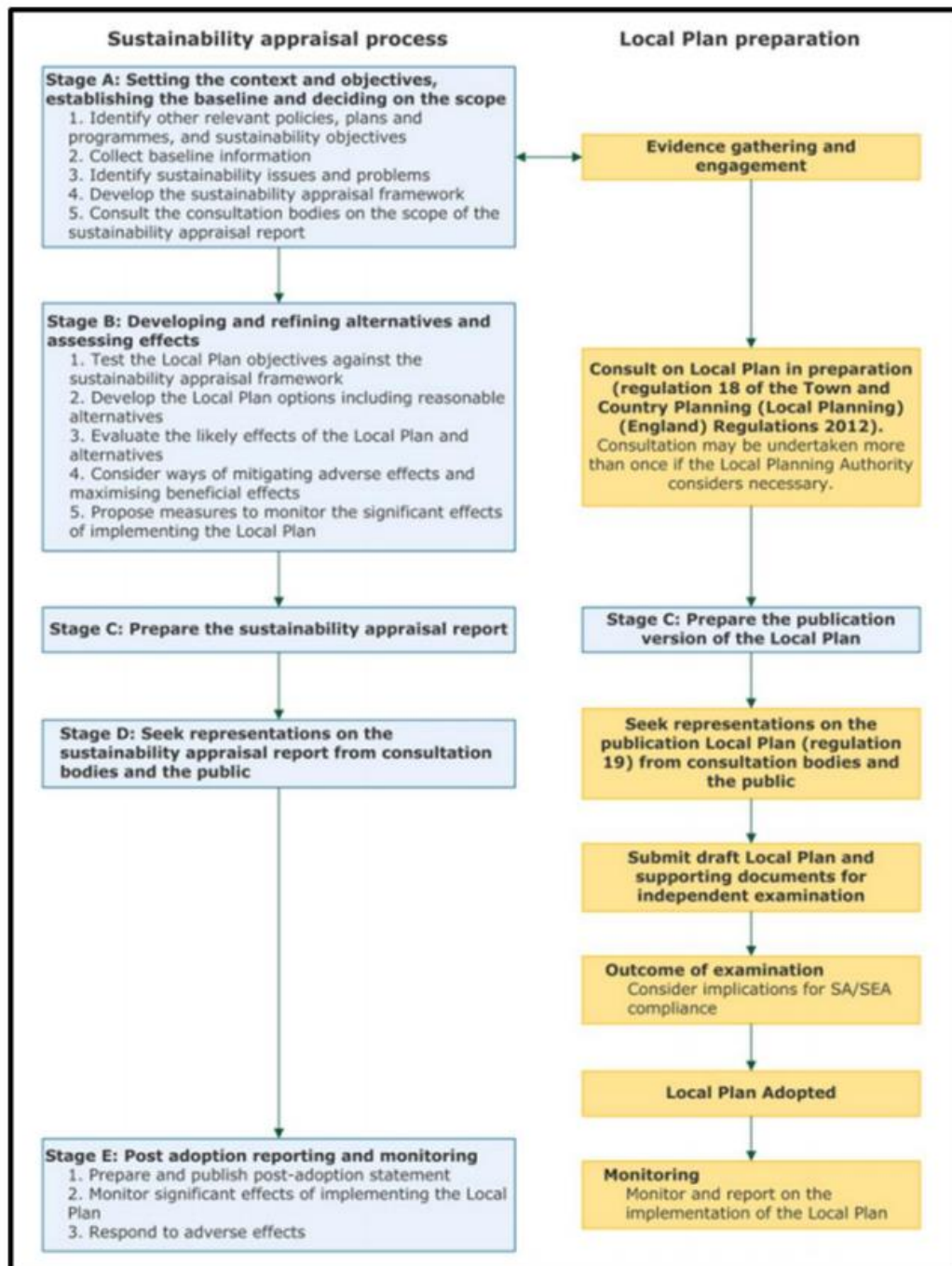


Figure 1: Stages of SA and Local Plan Preparation

Stage A: Scoping

- 3.6 The SA Scoping Report Review (2017) set out the context for the SA to consider the Strategic Policies and Development Management policies as 'Non Site-Specific' and Site Allocations as 'Site-Specific'. Sustainability Objectives were therefore developed accordingly to take into consideration the variance in determining the impacts of policies and site allocations. The 2020 Scoping Report Update provided a review of the SA objectives following Regulation 18 consultation responses, increasing emphasis on climate change and to consider any other changes in the Borough since the previous scoping exercise was undertaken.

Stage B: Developing and Refining Options

- 3.7 This is undertaken through the formulation of the draft Local Plan SA/SEA. The sustainability framework included 20 sustainability objectives and 11 site sustainability factors, covering the issues set out in the SEA Regulations, against which the policies, site allocations and reasonable alternatives were appraised and likely significant effects evaluated.
- 3.8 The SA 2020 considered options for each draft policy and site allocations, as well as the spatial distribution (or cumulative impact) of the site allocations. The assessments reflected information from officers, specialist advice (including statutory consultees) and through public consultation. The SA process identified a set of 'preferred options' and these were incorporated into later drafts of the Local Plan, and revised through the consultation process.
- 3.9 Section 3 of the SA 2020 concluded that the site-specific and non site-specific policies within the Plan would overall have a positive impact on sustainability overall.

Stage C: Appraising the effects of the Plan

- 3.10 The SA Addendum 2022 considered all the amendments made between 2020 and 2021. Amendments were screened to understand if the proposed changes would result in positive or negative material changes to the policies assessed within the KLWN SA 2020. Where it was deemed necessary to reappraise policies in light of the changes made, an updated assessment was undertaken against the updated objectives. Where policies were reappraised, the SA Addendum used the existing methodology, objectives and scoring criteria from the 2020 SA.
- 3.11 The SA Addendum 2022 concluded that the amendments to the policies made would increase sustainability of development within the Regulation 19 Plan and

result in additional likely positive effects overall. In particular, the tightening of criteria relating to project level Habitat Regulation Assessment increased the scoring in terms of the natural environment, climate change and human health.

- 3.12 A further SA Addendum was published in January 2024 to support the Borough Council of King's Lynn and West Norfolk Local Plan examination (Plan submitted March 2022), focusing on the assessment of potential Gypsy and Traveller and Travelling Showpeople (GTTS) sites and related Local Plan policies. Following consultation this was reviewed and updated in September 2024. Overall, this concluded that the Plan would constitute a sustainable form of development.
- 3.13 The HRA was updated alongside the Sustainability Appraisal with regards to the proposed GTTS site allocations. This considered the suitability of sites with reference to the Habitat Regulations' appropriate assessment requirements, culminating in publication of the September 2024 HRA of GTTS sites.

Stage D: Consultation

- 3.14 Alongside the Local Plan development, the SA has been consulted on at each stage of Plan preparation. Section 3 of the Regulation 22 Statement of Community Involvement⁴ also sets out when and how consultations were undertaken on the Sustainability Appraisal and Habitats Regulation Assessment.

- 3.15 Key consultation stages and dates were as follows:

- Draft Sustainability Appraisal Scoping Report (2017) – published in advance of the Call for Sites Consultation taking into account previous feedback from Natural England.
- Draft Sustainability Appraisal Report (2019) – published alongside the Local Plan Review receiving a significant number of comments that were considered in progressing the Plan.
- Sustainability Appraisal Scoping Report Update (2020) and feedback from the draft SA Report were presented to the Borough Council's Local Plan Task Group and informed final amendments to the draft Regulation 19 Local Plan Review.

⁴ https://www.west-norfolk.gov.uk/download/downloads/id/7099/a7_regulation_22_statement_of_consultation.pdf

- Sustainability Appraisal Addendum (2022) and Non-Technical Summary – published in support of the examination into the BCKLWN Local Plan Review.
- Main Modifications Part 1 and Part 2– consultation ran from August to November 2024 and included consultation on the updated SA Addendum.

Stage E: Monitoring the significant effects of implementing the Plan

3.16 This Adoption Statement forms part of the Stage E requirement, which involves:

- Finalising aims and methods for monitoring;
- Responding to adverse effects;
- Preparing a post-adoption statement (this document).

3.17 Stage E involves setting out how the monitoring of the significant effects of the Plan will be undertaken, in order to measure performance against sustainability objectives and inform future policy revisions. The sustainability effects of implementing the Local Plan must be monitored in order to identify unforeseen adverse effects and to enable any necessary remedial action.

3.18 Although monitoring is not required until the Plan is put into effect, the consideration of monitoring and indicators has been undertaken throughout the process. The SA provides a monitoring framework that will identify sustainability effects. It is intended that they will help form the basis of the Authority's Monitoring Report (AMR) and will be monitored regularly following the adoption of the Local Plan. The table in Appendix A presents the monitoring indicators against the scoped sustainability objectives.

4 The preferred strategy and options for the King's Lynn and West Norfolk Local Plan

- 4.1 The SEA Regulations require that, 'an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated'.
- 4.2 As discussed earlier (paragraph 3.3) 'reasonable alternatives' were considered for all policies and allocations in preparing the King's Lynn and West Norfolk Local Plan. From the outset, the SA process of the BCKLWN Local Plan Review has consistently used a SA Framework which was developed and refined during the SA scoping process as the basis for assessing the Plan (policies and site allocations).
- 4.3 Following the SA Scoping Report (2017), which was updated in 2020 alongside the Sustainability Appraisal Report, the SA consultation comments were published and reports were produced outlining the Council's response. The SA was then updated as an Addendum in July 2022 to take account of the concerns of the Inspectors Panel as to the Strategy and specific policies of the plan and subsequent 'main modifications' to resolve these concerns.
- 4.4 The SA Addendum set out the reasoning for re-appraisal, summarised the changes made at each stage and provided a high-level assessment of whether further appraisal was deemed necessary. A combined assessment was carried out where a re-appraisal was required for changes between 2020 and 2021. Many of the amendments to the KLWNLPR 2020 made factual changes to background information and referenced updated supporting evidence.
- 4.5 The analysis of the spatial distribution (LP01: Spatial Strategy) was also reappraised in the 2022 Addendum. The options assessed at the beginning of the plan-making process were based on assumptions around higher housing growth than have been taken forward in the Local Plan Review. Option 2AA10 & Rail Line Growth Corridor was considered to deliver the most sustainable outcomes for a higher level of housing growth (original options). As the Inspectors Report has indicated, the submission Plan envisages that those levels of housing growth anticipated will be delivered over a longer period of time, with a smaller amount of development in the Plan period.
- 4.6 Option 7 of the Local Plan Review (LPR) reflects this revised position. It is reasonable to assume that Option 7 LPR is the most sustainable option as it sets out a similar percentage split of development in settlements across the

plan area as Option 2A. It sets a lower level of development across those settlements, which will arguably result in lower absolute environmental impacts, as reflected in the appraisal scoring. The level of development and distribution pattern within Option 7 LPR still meets a threshold that would provide the necessary supporting infrastructure to ensure development is sustainable and negative impacts are minimised.

- 4.7 Preferred Option 7 LPR was distinct from Option 2A in that it provides for a lower level of growth within the plan period but broadly aligns with the spatial distribution. Option 6A (Existing Plan Policy) reflected the lower level of growth, through existing allocations, but would not allow the Plan to make best use of the evidence currently available, or to control the spatial distribution of the additional levels of development. The SA scores for all three options are similar, however Option 7 LPR is the most reasonable in terms of the level of development it provides in the most sustainable distribution.
- 4.8 As the Inspectors Report (paragraph 33) stated, whilst it was not subject to SA until after submission, the SA Addendum 2022 provided an objective appraisal of it on an equal basis to the alternative strategies and provided reasons for its selection as the basis for the publication Plan.
- 4.9 All site allocations were also appraised as part of the SA process. The majority of these are existing site allocations in the adopted SADMP Plan, many of which already benefit from planning permission, and which the Plan proposes to carry forward. Whilst alternative sites identified through the 'Call for Sites' were assessed as part of the Housing and Economic Land Availability Assessment (HELAA), they were not appraised as reasonable alternatives to adopted sites being carried forward. As noted above, other policies that were subject to change between the draft and publication versions of the Plan were reappraised in the SA Addendum. Overall, the changes taken together were shown to increase the sustainability of development proposed in the Plan and therefore its likely positive effects. In particular, amendments to tighten criteria relating to project level Habitat Regulation Assessment increased the scoring in terms of the natural environment, climate change and human health.
- 4.10 Further addendums to the SA were produced to support the emerging policies and site allocations for Gypsies, Travellers and Travelling Showpeople. The primary objective of the Sustainability Appraisal Addendum was to provide an objective and robust assessment of potential sites for GTTS needs and evaluate their suitability across sustainability objectives, following production of

the Gypsy and Traveller Accommodation Assessment (GTAA) (June 2023)⁵. As this had initially been proposed as a joint piece of work outside the Local Plan Review at the time of producing the main SA report, the GTTS requirement was not included within the initial assessments.

- 4.11 Following a consultation exercise in January 2024, the Council continued to collect all available information to understand whether the identified needs could be met through the intensification and authorisation of existing sites. The Council assessed all existing Gypsy, Traveller and Travelling Showpeoples' sites and shortlisted and discounted 55 sites from future development, which was set out in the Site Assessment Document (May 2024).
- 4.12 The GTTS SAAddendum 2024 considers that the cumulative impacts of the Plan (as assessed in the SA 2020 and SA 2022) are not materially impacted by the inclusion of GTTS site allocations and policies. The GTTS SAAddendum also recognises potential mitigation measures that have been set out in the supporting policies to help enable the delivery of sustainability objectives and reduce any negative cumulative impacts. The SAAddendum was also accompanied by a Habitats Regulations Assessment (HRA) of GTTS sites to determine likely significant effect on certain European sites and whilst there are some links between the requirement and SA/SEA.

⁵ [Gypsy and traveller accommodation assessment](#) | [Gypsy and traveller accommodation assessment](#) | [Borough Council of King's Lynn & West Norfolk](#)

5 Consultation and Response to Main Modification Representations

- 5.1 Public and stakeholder engagement is an important part of the SA (and wider plan-making processes), helping to ensure that the SA Report is robust and has due regard for all appropriate information that will support the Plan in making a contribution to sustainable development. The various stages of consultation have been referred in Section 3 and reports have been produced to summarise representations received, alongside Council feedback. The SA and HRA have also been prepared as an integral part of this process and comments have been incorporated accordingly.
- 5.2 Following the Hearing, the Council prepared schedules of the proposed MMs and, where necessary, carried out Sustainability Appraisal and Habitats Regulations Assessment of them. The MMs Parts 1 and 2 were subject to public consultation over an eight week and six week period respectively. Officers collated representations to main modifications, summarising each (totalling around 450 separate comments) and duly responding to each comment⁶.
- 5.3 There were no comments specifically on the SA/SEA/HRA, although a small number of comments pertaining these were included within representations regarding the Plan itself (e.g. Natural England).
- 5.4 There were a number of comments on the revised spatial strategy and settlement hierarchy, including comments relating to the sustainability implications. There was some recognition of growth in the most sustainable locations however a few comments objected to the changes to the previous strategic growth corridor approach and deletion of the Growth Key Rural Service Centres (KRSC) category, whilst others were supportive. These changes were considered in detail in the inspector's report Issue 1.

'The concentration of growth at King's Lynn is justified, as a sub-regional centre and the largest and most sustainable settlement in the Borough in terms of services and access by a genuine choice of transport modes. However, the increased focus of growth in the rest of the Strategic Corridor is on the [West Winch] GA, rather than Downham Market and Watlington, which, with railway stations, appear to be more sustainable locations in transport terms.'

⁶ [Responses to the Consultations](#) | [Responses to the Consultations](#) | [Borough Council of King's Lynn & West Norfolk](#)

Consequently, the Strategic Growth Corridor is not justified, based on the evidence.'

- 5.5 The MMs consultation also received a number of comments on windfall development, with varying views that the policy should allow more as opposed to others suggesting it was too restrictive as well as some supportive comments. The Inspector has considered the policy appropriate in establishing thresholds in line with the settlement hierarchy and as such:

'This New Policy would be positively prepared, and, along with other rural development policies in the Plan, would be effective in enabling the delivery of sustainable development in the rural areas of the Borough, whilst respecting the character and identity of rural settlements.'

- 5.6 The Council consider the approach balanced to allow sufficient delivery whilst ensuring the existing character and identity of settlements is maintained. The proposed housing supply relies on the delivery of over 3,000 dwellings from windfall sites. Development boundaries for all settlements in each tier of the hierarchy have been defined on the Policies Map, which were subject to consultation.

- 5.7 The Inspector's Report has concluded in paragraph 35.

'Overall, we are satisfied that a robust and proportionate SA of the Plan has been carried out, which has assessed the likely environmental, social and economic effects of the Plan and incorporates the requirements for SEA. Accordingly, we conclude that the SA work undertaken on the Plan is adequate.'

6 Measures to be taken to monitor the significant environmental and sustainability effects caused by the implementation of the Local Plan

- 6.1 Regulation 17(1) of The Environmental Assessment of Plans and Programmes Regulations (SI 1633) 2004 sets out the requirement that any significant environmental impacts caused by the implementation of the Plan should be continuously monitored with the purpose of identifying unforeseen adverse implications at the earliest possible stage, allowing the Council to intervene and take appropriate remedial action.
- 6.2 The PPG outlines that the SA itself should only focus on what is needed to assess the likely significant effects of the Plan, focusing on the environmental, economic and social impacts that are likely to be significant. As such monitoring of the Local Plan will be focused on the significant sustainability impacts which will be done through the monitoring of Local Plan policies.
- 6.3 The PPG also states that details of the monitoring arrangements may be included in the Local Plan itself. The Monitoring Framework set out in chapter 16 of the adopted Local Plan sets out the arrangements for how the policies will be monitored throughout the plan period.
- 6.4 The recommendations from the SA 2020 were incorporated into the Monitoring section of the Local Plan Review. The SA Addendum 2022 also considered comments made in relation to the SA consultations, particularly by Natural England, and makes a series of recommendations in relation to indicators to be considered in finalising the Local Plan. The indicators have been updated as part of modifications (MM369) made to the Local Plan during the examination process (Appendix A).
- 6.5 The SEA Post-Adoption Statement includes the final set of indicators with links to specific policies in the Local Plan monitoring schedule. Monitoring will be undertaken through the BCKLWN AMR, the AMR for Norfolk County Council, and through the Norfolk Recreational Impact Avoidance and Mitigation Strategy governance arrangements.
- 6.6 The strategic policies in the Local Plan will relate to all of the Sustainability Objectives. The last column indicates where these suggested indicators could link to policies within the Local Plan.
- 6.7 Through this monitoring process, the Council will be able to identify how effective the policies are, and any unforeseen adverse effects arising from implementation. This will be highlighted in the AMRs and, if relevant,

recommendations will be made regarding the need for revisions to any policies in the Local Plan through the five-year review process.

7 Availability of Adoption Documents

- 7.1 The Borough Council of King's Lynn and West Norfolk Local Plan 2021-2040 including the Policies Map, Sustainability Appraisal Reports (and Habitats Regulation Assessment) and this Sustainability Appraisal Adoption Statement are available to view on the Council's website at [Local Plan review \(2021-2040\) plan-making stages | Local Plan review \(2021-2040\) plan-making stages | Borough Council of King's Lynn & West Norfolk](#).
- 7.2 Paper copies of these documents are available for public inspection at:
- Borough Council of King's Lynn & West Norfolk
Kings Court
Chapel Street
King's Lynn
Norfolk
PE30 1EX
- Open Monday-Thursday 9.00am-5.00 pm & Friday 9.00am-4.45pm
- 7.3 Further local library locations are listed in Appendix B.
- 7.4 For further information please refer to the Council's [local plan website](#) or contact the Planning Policy Team by email at planning.policy@west-norfolk.gov.uk or by telephone on [01553 616200](tel:01553 616200).

Appendix A: Monitoring and Delivery Framework

Policy	Indicator	Target	Source, and how information will be collated	Analysis
Section 3 (Strategic Objectives)	Economy – sustainable economic growth	Delivery of LP01/ LP07 employment land allocations	Reference to planning permissions – system for reporting information already in place (Monitoring team)	Outcomes linked to strategic policy targets re employment, housing, or green infrastructure delivery
	Society – housing to meet current needs and that of future generations	Minimum 554 dwellings per year (mean) over Plan period	Reference to planning permissions – system for reporting information already in place (Monitoring team)	
		Delivery of housing land allocations	Planning decisions (Monitoring team)	
	Environment – protect and enhance natural and historic environment	0 permissions granted contrary to policy LP16-LP21	Planning decisions (Uniform reporting)/ GIS	Reference to committee reports (re decision making)
LP01 Spatial Strategy and Settlement Hierarchy	Number of dwellings granted planning permission & net residential completions.	Minimum 554 dwellings per year (mean) over Plan period	Reference to planning permissions – system for reporting information already in place (Monitoring team)	Review of process may need to be considered and documented.
	Number of residential permissions that have lapsed without implementation.	No more than 7% of lapsed permissions (Action 103 Note)	Planning permissions -annual reporting (Monitoring team)	Historically challenging, due to the lack of clarity of whether a site has been started or not

	Percentage of new homes within each settlement hierarchy tier	General accordance with % growth for each tier	% New homes can be achieved by using the GIS.	Hierarchy data will need to be captured as polygon data and a process written up
LP02 Residential development on windfall sites	Number of permissions granted outside development boundaries that do not fulfil policy criteria	No permissions granted contrary to policy criteria	Planning permissions/ GIS enquiry (Monitoring team)	Resolution through combined planning permissions reporting and GIS filter
LP03 Neighbourhood Plans	Net Housing Requirements delivered in designated Neighbourhood Areas	Minimum Net Housing Requirements delivered over the Plan Period for designated Neighbourhood areas	Planning permissions/ GIS enquiry (Monitoring team)	Monitoring framework straightforward, through established Monitoring team processes
LP04 Presumption in Favour of Sustainable Development	No. of permissions granted, in accordance with officer advice	0 decisions overturned on appeal, contrary to officer recommendation(s)	Planning decisions (Uniform reporting)	Straightforward; established processes/ system

LP05 Implementation	Delivery of schemes identified in Infrastructure Delivery Schedule (IDS)	Delivery in line with IDS indicative phasing	CIL Monitoring Report	Information via CIL team; also infrastructure providers (Norfolk CC; utilities companies etc)
	Financial Contributions received/ on-site facilities provided for community services and infrastructure through development			Information re S106 triggers/ monitoring
LP06 Climate Change	No. of permissions granted in accordance with policy criteria	0 decisions overturned on appeal, contrary to officer recommendation(s)	Planning decisions (Uniform reporting)	
LP07 The Economy	Number of planning permissions granted on allocated employment sites	Delivery of allocated sites during Plan period (by 2040)	Planning decisions (Uniform reporting) – No. of permissions granted or No. of units/ floorspace granted	Employment Applications are recorded and processed in the same formats as dwellings
	Amount of employment land lost	No net loss of employment land	Planning decisions (Uniform reporting)	GIS data could also be used to set a base line

	Number of permissions for tourism accommodation	No specific Borough-wide target	Planning decisions (Uniform reporting) – record as Non Domestic	Targets may be set for individual Neighbourhood areas with principal residences policies
	Number of permissions for Rural Exception Sites (non-residential/rural diversification).	No specific target	Planning decisions (Uniform reporting) – record as Non Domestic	Inappropriate to set targets, as rural exceptions projects are (by their nature) reactive
LP08 Retail Development	Number of permissions for out-of-town retail uses.	No net gain (Class E retail floorspace)	Planning decisions (Uniform reporting) – No. of permissions granted or No. of units/ floorspace granted	Need to record (or check) using GIS, with reference to town centre boundaries – King's Lynn; Downham Market; Hunstanton; Gaywood
	Number of permissions for retail use in King's Lynn, Downham Market and Hunstanton	0 permissions granted unless supported by sequential test	Planning decisions (Uniform reporting)	Need to record (or check) using GIS, with reference to town centre boundaries
LP09 Touring and Permanent Holiday Sites	Number of permissions for holiday uses/ intensification of holiday uses within AONB & Coastal Hazard Zone	No specific target	Planning decisions (Uniform reporting)/ Spatial query via GIS	Monitor with reference to No. of permissions granted or No. of dwellings granted

LP10 Development associated with National Construction College site, British Sugar Factory and RAF Marham	Number of permissions which seek to improve these businesses/ operations	No specific target	Planning decisions (Uniform reporting)	
LP11 Strategic Road and Major Road Network	Number of planning permissions granted that reference policy in decision	No specific target	Planning decisions (Uniform reporting)/ GIS	Also reference to committee reports (re decision making) re whether proposal(s) would result in a significant adverse effect on the network
LP12 Disused Railway Trackways	Number of planning permissions granted that would prejudice potential future use of disused railway tracks	0 permissions that would prejudice potential future use of disused railway tracks	Planning decisions (Uniform reporting)/ GIS	With some criteria, reporting could be done via spatial query in GIS
LP13 Transportation	Delivery of transport/ bus schemes identified in IDS	Delivery in line with IDS indicative phasing	CIL Monitoring Report	Information via CIL team; also transport bodies (Norfolk CC; National Highways etc)

LP14 Parking Provision in New Development	Percentage of new developments granted planning permission with policy-compliant car parking provision	0 permissions granted that do not include policy compliant car parking	Planning decisions (Uniform reporting)	Proposals unlikely to gain planning consent if not compliant unless officer recommendation to refuse is overturned.
	Percentage of new developments granted planning permission with policy-compliant cycle parking provision	0 permissions granted that do not include policy compliant cycle parking	Planning decisions (Uniform reporting)	Proposals unlikely to gain planning consent if not compliant unless officer recommendation to refuse is overturned.
LP15 Coastal Areas Policy	Number of planning permissions granted for replacement/ extensive alterations/ relaxation of occupancy limitations	No specific target	Planning decisions (Uniform reporting) Spatial query via GIS – AONB/ National Landscape area	Specific spatial areas - could therefore monitor applications granted in that area/ check to see if the permission relates to occupancy limitation
LP16 Norfolk Coast National Landscape	Number of planning permissions granted contrary to policy in the National Landscape area (AONB)	0 permissions granted contrary to policy criteria	Planning decisions (Uniform reporting)/ spatial query via GIS	

LP17 Management of Development within the Coastal Area	Number of new dwellings/new or additional park homes/caravans granted planning permissions within the Coastal Change Management Area	0 permissions granted contrary to policy criteria	Planning decisions (Uniform reporting)/ spatial query via GIS	
	Planning permissions granted for replacement dwellings in the Coastal Change Management Zone	0 permissions granted contrary to policy criteria either directly or as a result of a breach in coastal defences	Planning decisions (Uniform reporting)/ spatial query via GIS	
	Planning permissions granted for additional habitable rooms in the Coastal Change Management Area	0 permissions granted contrary to policy criteria	Planning decisions (Uniform reporting)/ spatial query via GIS	

	Planning permissions granted for seasonal occupancy outside of 1 April and 30 September	0 permissions granted contrary to policy criteria	Planning decisions (Uniform reporting)/ spatial query via GIS	
LP18 Design & Sustainable Development	Number of permissions refused on design grounds (i.e. poor/ inadequate quality design)	0 permissions granted contrary to policy criteria	Planning decisions (Uniform reporting)/ GIS	Reference to committee reports (re decision making) re whether proposal(s) would result in inadequate design – condition should be clear and therefore reportable
LP19 Environmental Assets - Green Infrastructure,	Gains and losses to the areas of designated green infrastructure, Landscape Character, Biodiversity and Geodiversity	No net loss of designated green infra-structure areas	Planning decisions (Uniform reporting)/ GIS	GIS data required – County Wildlife Sites; Ancient Woodlands / County Geodiversity Sites

LP20 Environmental Assets- Historic Environment	Development proposals that would adversely affect Listed Buildings (designated heritage assets)	0 planning permissions granted where a significant adverse impact upon a listed building is identified	Planning decisions (Uniform reporting)/ reference to Planning Committee reports. Conservation team to advise/ provide necessary data/ information	Previous suggested monitoring indicator: "Demolition of Listed Buildings" is an extremely rare occurrence and would need to be approved by the Secretary of State. Therefore, a more appropriate approach could be developed through monitoring LB consents
	Development proposals that would adversely affect Listed Buildings (designated heritage assets)	0 planning permissions granted where a significant adverse impact upon a listed building is identified	Planning decisions (Uniform reporting)/ reference to Planning Committee reports. Conservation team to advise/ provide necessary data/ information	Non-designated heritage assets within Conservation Areas have statutory protection.
	Number of Listed Buildings at Risk	No increase to number of buildings on Building at Risk (BAR) Register	Conservation team to advise/ provide necessary data/ information re BAR Register	

LP21 Environment, Design and Amenity	Number of permissions refused on design grounds (i.e. poor/ inadequate quality design)	0 permissions granted contrary to policy criteria	Planning decisions (Uniform reporting)/ GIS	Reference to committee reports (re decision making) re whether proposal(s) would result in inadequate design – condition should be clear and therefore reportable
LP22 Provision of Recreational Open Space for Residential Developments	Delivery of public open spaces to serve new developments in association with policy criteria	New open space delivered in accordance with policy requirements	S106 agreements	Previous indicator (gains and losses to the areas of open space) proposed to be replaced by reference to delivery of open space to serve new developments
LP23 Green Infrastructure	Gains and losses to the areas of green infrastructure	No net loss of designated green infra-structure sites	Planning decisions (Uniform reporting)/ GIS	Specific green infrastructure sites proposed to be shown on the Policies Map, in line with Inspectors' recommendations

LP24 Renewable Energy	No of schemes for renewable energy projects delivered	No specific target	Planning decisions (Uniform reporting)	Some questions as to how far these could be monitored; e.g. single/ small wind turbines. May be better to consider other possibilities where data is available; e.g. generating capacity.
LP25 Sites in Areas of Flood Risk	Planning permissions granted contrary to Environment Agency advice on flooding	0 permissions granted contrary to Environment Agency advice	Planning decisions (Uniform reporting)/ reference to Planning Committee reports	Questions raised as to source – reference officer reports in individual cases
LP26 Protection of Local Open Space	Gains and losses to areas of open space	No net loss to public or designated areas of open space	Planning decisions (Uniform reporting)/ reference to Planning Committee reports	Use of GIS data to collate information
LP27 Habitats Regulation Assessment	Number of planning permissions with GI-RAMS contributions	All permissions judged to create net increase to recreational pressure	Planning decisions (Uniform reporting)	Income for GIRAMS is recorded in Uniform. No. of planning permission granted or No. of dwellings

	Number of developments permitted within 1500m of the Breckland SPA not related to the reuse of existing building	0 permissions granted within 1500m of Breckland SPA	Planning decisions (Uniform reporting)/ Use of GIS data to collate information	
LP28 Affordable Housing	Percentage of new residential units that are classed as affordable housing	15% King's Lynn 20% all other areas On all sites that meet threshold	Planning decisions (Uniform reporting)	Developments over a certain size will be required to provide affordable housing or a contribution to be policy compliant. Affordable housing contributions normally secured through S106 agreements.
LP29 Housing for the elderly & Specialist Care	Number of specialist care and supported living bed spaces completed	No net loss	Strategic Housing team	Need to set in place new monitoring process going forward
LP30 Adaptable & Accessible Homes	Percentage of affordable housing on major development that are M4(3) – Building Regulations	5% of new units to M4(3) standard on major developments	Planning decisions (Uniform reporting)/ Strategic Housing team	

LP31 Custom and Self-Build Housing	No of permissions granted for Custom and Self Build Housing	Meeting identified need – Custom and Self-Build (C&SB) Register	Planning decisions (Uniform reporting)/ Strategic Housing team	
LP32 Sites for Gypsies, Travellers and Travelling Showpeople	No of pitches/ plots granted planning permission	Delivery of allocated Gypsy and Traveller pitches and Travelling Showpeople Plots (in accordance with need identified through Gypsy and Traveller Accommodation Assessment	Planning decisions (Uniform reporting) Reference to planning permissions – Strategic Housing team and Housing Standards Officer (Housing Services)	
LP33 Caravans, Park Homes and Houseboats	No of units (caravans, park homes or houseboats) granted planning permission	No specific target	Planning decisions (Uniform reporting)	Inappropriate to set target, as policy is solely reactive, relating to matters of development management
LP34 Houses in Multiple Occupation	No. of conversions of existing dwellings/new development for HMOs	No specific target	Planning decisions (Uniform reporting)/ Housing Services team	Need to put in place process/ system for monitoring, going forward
LP35 Enlargement or Replacement of Dwellings in the Countryside	Number of planning applications refused on design	No specific target	Planning decisions (Uniform reporting)/ officer reports	Inappropriate to set target, as policy is solely reactive, relating to matters of development management.

	grounds in the countryside			
LP36 Housing Needs of Rural Workers	Number of permanent occupational dwellings	No specific target	Planning decisions (Uniform reporting)/ officer reports	Inappropriate to set target, as policy is solely reactive.
	Number of temporary occupational dwellings	No specific target	Planning decisions (Uniform reporting)/ officer reports	Inappropriate to set target, as policy is solely reactive.
LP37 Residential Annexes	Number of permissions granted for residential annexes	No specific target	Planning decisions (Uniform reporting)/ officer reports (conditions)	Inappropriate to set target, as policy is solely reactive, relating to matters of development management
LP38 Community and Culture	Number of new community facilities	Delivery of new community facilities in accordance with IDP	Planning decisions (Uniform reporting)/ CIL reporting	New facilities recorded as non-residential uses

	Gains and losses of community facilities	No net loss to facilities	Planning decisions (Uniform reporting)/ officer reports	May be able to reference GIS spatial data to establish existing range of services/ facilities. Also reference 2023 services survey data [F47a]
LP39 Community Facilities	Number of new community facilities	No specific target	Planning decisions (Uniform reporting)/ CIL reporting	New facilities recorded as non-residential uses
	Gains and losses of community facilities	No net loss to facilities	Planning decisions (Uniform reporting)/ officer reports	May be able to reference GIS spatial data to establish existing range of services/ facilities. Also reference 2023 services survey data [F47a]
LP40 King's Lynn Area	Housing Nos. and employment land areas (ha)/ non-residential floorspace	Delivery of allocated housing and employment land (in accordance with Policy LP01)	Reference to planning permissions – system for reporting information already in place (Monitoring team)	Targets linked to overall strategic targets (LP01)

LP41 Downham Market	Housing Nos. and employment land areas (ha)/ non- residential floorspace	Delivery of allocated housing and employment land (in accordance with Policy LP01)	Reference to planning permissions – system for reporting information already in place (Monitoring team)	Targets linked to overall strategic targets (LP01)
LP42 Hunstanton Policy	Housing Nos. and employment land areas (ha)/ non- residential floorspace	Delivery of allocated housing and employment land (in accordance with Policy LP01)	Reference to planning permissions – system for reporting information already in place (Monitoring team)	Targets linked to overall strategic targets (LP01)

Appendix B: Further Information on Document Access

Please see [Norfolk](#) and [Cambridgeshire County Council](#) websites for latest opening hours):

Dersingham Library Chapel Road, Dersingham, PE31 6PN

Opening hours:

Monday: 8am to 2pm - Open Library access
2 to 7pm - Library is staffed

Tuesday: 8am to 7pm - Open Library access

Wednesday: 8 to 10am - Open Library access
10am to 7pm - Library is staffed

Thursday: 8 to 10am - Open Library access
10am to 7pm - Library is staffed

Friday: 8am to 7pm - Open Library access

Saturday: 8 to 10am - Open Library access
10am to 4pm - Library is staffed

Sunday: 10am to 4pm - Open Library access

Sunday: Closed

Downham Market Library The Priory Centre, 78 Priory Road, Downham Market, PE38 9JS

Opening hours:

Monday: 8am to 7pm - Open Library access

Tuesday: 8 to 10am - Open Library access
10am to 7pm - Library is staffed

Wednesday: 8 to 10am - Open Library access
10am to 7pm - Library is staffed

Thursday: 8 to 10am - Open Library access
10am to 7pm - Library is staffed

Friday: 8 to 10am - Open Library access
10am to 7pm - Library is staffed

Saturday: 8am to 1pm - Open Library access
1 to 4pm - Library is staffed

Sunday: 10am to 4pm - Open Library access

Gaywood Library River Lane, Gaywood, King's Lynn, PE30 4HD

Opening hours:

Monday: 8 to 10am - Open Library access

10am to 7pm - Library is staffed

Tuesday: 8 to 10am - Open Library access

10am to 7pm - Library is staffed

Wednesday: 8am to 7pm - Open Library access

Thursday: 8 to 10am - Open Library access

10am to 7pm - Library is staffed

Friday: 8 to 10am - Open Library access

10am to 7pm - Library is staffed

Saturday: 8 to 10am - Open Library access

10am to 4pm - Library is staffed

Sunday: 10am to 4pm - Open Library access only

Hunstanton Library 12 - 14 Valentine Road, Hunstanton, PE36 5EF

Opening hours:

Monday: Closed

Tuesday: 9am to 7pm

Wednesday: 9am to 7pm

Thursday: Closed

Friday: 9am to 7pm

Saturday: 9am to 4pm

Sunday: Closed

King's Lynn Library London Road, King's Lynn, PE30 5EZ

Opening hours:

Monday to Friday: 8 to 10am - Open Library access

10am to 7pm - Library is staffed

Saturday: 8 to 10am - Open Library access

10am to 4pm - Library is staffed

Sunday: 10am to 4pm - Open Library access

Wisbech Library Ely Place, Wisbech, PE13 1EU

Opening times:

Monday: 9:30am to 1pm

Tuesday: 9:30am to 7pm

Wednesday: 9:30am to 5pm

Thursday: 9:30am to 5pm

Friday: 9:30am to 5pm

Saturday: 9:30am to 4pm

Sunday: Closed