



Authority Monitoring Report 2024 - 2025

Borough Council of
King's Lynn &
West Norfolk



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This report covers the final monitoring period for the Core Strategy (2011) and SADMP (2016)

Executive Summary

This Authority Monitoring Report (AMR) covers the monitoring period from 1 April 2024 to 27 March 2025, which marks the final year of monitoring under the previous Local Plan comprised of Core Strategy (CS) adopted in 2011 and Site Allocations and Development Management Policies (SADMP), adopted in 2016. The new Local Plan 2021 - 2040 was adopted on 27 March 2025, and future reports will be monitored against the new policy framework set out by this.

The report confirms a period of economic recovery and successful delivery of affordable housing, set against the ongoing challenge of meeting specific government housing targets and safeguarding certain types of specialist housing stock.

Key conclusions of the last monitoring period of CS and SADMP policies are as follows:

The borough experienced strong economic recovery, with the employment rate reaching a record 85.9% and a significant rise in average weekly pay (£731.10). The new Local Plan 2021-2040 allocates an additional 25 hectares of employment land to support future growth.

The Borough maintains a robust 7.9 year housing land supply, which exceeds the national minimum requirement. However, housing completions resulted in a Housing Delivery Test (HDT) score of 87%, below the required 95% threshold. This triggered the need for an updated Action Plan, which was published in November 2024.

Over 30% of new homes were delivered on previously developed (brownfield) land which is demonstrating effective use of sustainable locations.

A record 202 affordable homes were delivered this year, more than a double of the previous outputs marking major progress toward meeting local housing needs.

Monitoring demonstrates a shortfall and the net loss of Rural Workers Housing and a persistent shortfall in the delivery of Custom and Self-Build housing when compared to registered demand.

Monitoring suggests that air quality has improved, leading to the withdrawal of the Gaywood Clock AQMA.

Introduction

The Authority Monitoring Report (AMR) is a statutory document produced annually to track progress on planning related matters and assess the performance of the Local Plan.

This report presents key facts and figures relevant to the Borough Council of King's Lynn and West Norfolk, covering the monitoring period **from 1 April 2024 to 27 March 2025**. It outlines the types and quantities of development that occurred during this time and compares them with previous monitoring years. It also includes information on the development of emerging Local Plan 2021-2040, which was undergoing examination hearings during this monitoring period and was adopted on 27 March 2025.

Unlike earlier reports that monitored data across full financial years, this report concludes on 27 March 2025. As such, this report reflects the final phase of monitoring under the previous Local Plan framework, comprising the Core Strategy (2011) and the Site Allocations and Development Management Policies (2016).

This AMR is produced in compliance with Section 35 of the Planning and Compulsory Purchase Act 2004 (as amended) Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012, which mandates that Local Planning Authorities (LPAs) publish annual report on the Local Plan policy performance against the growth targets, to assess the effectiveness of the Plan.

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.

This report covers the final monitoring period for the Core Strategy (2011) and SADMP (2016)

The statutory requirements for monitoring reports are demonstrating the following:

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 measures are included within this AMR. The reporting of this is structured to align with the objectives and monitoring framework of the Borough's Local Plan. From 1 April 2024 to 27 March 2025 this comprised of the Core Strategy, adopted 2011, and the Site Allocations and Development Management Policies (SADMP), adopted 2016. It will form the final Authority Monitoring Report (AMR) for the previous Local Plan (covering the period 2001-2026). The replacement Local Plan 2021-2040 was adopted on 27 March 2025, meaning that monitoring against the new Local Plan will commence through 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. While the Government no longer requires data on 'Core Output Indicators', some of this data provides helpful indicators of the volume and types of development achieved locally during the monitoring period, and the further development of a time series of comparable data will provide added information/ value over time, where available.

This report covers the final monitoring period for the Core Strategy (2011) and SADMP (2016)

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

This report covers the final monitoring period for the Core Strategy (2011) and SADMP (2016)

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, a small (3ha) increase upon the minimum Core Strategy requirement.

Ref	Name	Area (Ha)	Status	2018/19 & 2019/20 Position	2020/21 & 2021/22 Position	2022/23 & 2023/24 Position	2024/25 Position
E1.12 - HAR	Hardwick (King's Lynn)*	27	Completed	0	0.7	0.7	0.7
			Under Construction	0	0	0	0
			Permission	27	2	2.9	2.9
			No Permission	0	24.3	23.4	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	2.8	3.4	3.6
			Under Construction	0	0	0	0.2
			Permission	1.35	0.9	0.7	0.4
			No Permission	13.25	13.2	12.8	12.6
F2.5	Land south of Hunstanton Commercial Park (Hunstanton)	1	Completed	0	0	0	0
			Under Construction	0	0	1	1
			Permission	1	1	0	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

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Ref	Name	Area (Ha)	Status	2018/19 & 2019/20 Position	2020/21 & 2021/22 Position	2022/23 & 2023/24 Position	2024/25 Position
			Completed	1.8	3.5	4.1	4.3
			Under Construct-ion	0	0	1	1.2
			Permission	29.35	3.9	3.6	3.3
			No Permission	37.8	61.5	60.2	60.0
			Complete %	2.6%	5.1%	6%	6.3%

* 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. These sites have all been carried forward into the replacement Local Plan 2021-2040, adopted March 2025 (end of the 2024-25 monitoring period).

E1.12 – HAR at King’s Lynn

At 27ha, this was the largest single employment site allocation in the SADMP. Since adoption (September 2016), 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 2025 there were 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

Part of this site is an established business park as the name ‘St John’s Business Park’ suggests. There is a north/ south access spine road, consisting of the A1122 and St John’s Way, with a number of businesses operating from St John’s Way. As of March 2025, 3.6ha (out of 16.9) was complete/ operational for business uses. There are also extant permissions for various industrial and commercial units (total 0.4ha), with 0.2ha of employment uses under construction.

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/

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early-2024 and still underway as of March 2025.

Overall, the table shows that significant areas of land remain available within the SADMP Employment Allocations (all carried forward into the new Local Plan 2021-2040) for future employment development. However, it is important to note that this is not the full picture as beyond the allocations, there are existing and established areas of employment land.

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).

New Employment Land Allocations

On 27 March 2025, the new Local Plan 2021-2040 was adopted. This replaced the SADMP and included additional employment land allocations (see table below), for an additional 24.8 (~25) ha. Delivery on these new site allocations (Policy LP07 and associated site-specific policies) will be monitored, from the 2025-2026 monitoring period (2026 AMR).

Ref	Name	Area (Ha)
E1.12 - EST	Land off Estuary Road (King's Lynn)	3
E1.5	Boal Quay (King's Lynn – mixed use)	1.8
BEX1	Bexwell Business Park (Downham Market)	20

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/media/20186/Employment-Land-Report/pdf/40Employment_Land_Report_2023-2024.pdf?m=1749049692730

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DM11 - Touring and Permanent Holiday Sites

SADMP Policy 'DM 11 – Touring and Permanent Holiday Sites' 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 areas (which have some overlap along The Wash coast) stretch from South Wootton/ Castle Rising to Holkham (North Norfolk District) within the Borough, following the A149/ coast road corridor.

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 their development will not have negative impact on the landscape setting or scenic beauty of the National Landscape area.

Small scale proposals are not normally permitted within the National Landscape area, unless they can demonstrate that the proposal will not have negative 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 would 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 National Landscape and Coastal Flood Risk Hazard Zone.

	2018/19	2019/20	2020/21 & 2021/22	2022/23 & 2023/24	2024-2025
PP for Touring and permanent holiday sites granted	7	7	6	11	12

Within the National Landscape area and Coastal Flood Risk Hazard Zone, since 2017 there were 60 planning permissions granted for touring and permanent holiday sites of various types/ descriptions. Of these, 12 were approved since 1 April 2024. This compares to 34 planning permissions that cited DM11, granted since the 2017 monitoring period.

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

	2020/21	2021/22	2022/23	2023/24	2024/25
No of planning permissions citing Policy DM11 (within National Landscape area/ Policy DM18 Coastal Flood Risk Hazard Zone)	2	8	11	7	6

Of the planning permissions granted between 1 April 2024 to 27 March 2025 and citing DM11, there was 1 major outline planning permission for Touring and Permanent Holiday Sites granted. Additionally, there were 4 planning permissions for Touring and Permanent Holiday Sites which were granted retrospectively. A further 6 permissions were granted for new holiday lets, of which 3 were within the National Landscape Area.

To be acceptable, new proposals should be in accordance with the following:

- national policies on flood risk;
- not within the Coastal Hazard Zone;
- not within areas identified as Tidal Defence Breach Hazard Zone in the Borough Council's Strategic Flood Risk Assessment (SFRA) or the Environment Agency's mapping; and
- where applicable, principal residences policies in made Neighbourhood Plans – Burnham Market, Heacham, Holme Next The Sea, Old Hunstanton, Ringstead, 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 may be permitted provided that any resulting increase in traffic would not have a 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 the 2024/2025 monitoring period, Policy DM12 was cited in just 1 planning permission.

During the current monitoring period, one notable application was assessed against Policy DM12, for a major mixed-use scheme at Pentney. This required access via the A10 and was permitted with measures to safeguard highway safety and maintain the Strategic Road Networks function.

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For monitoring purposes, the measure for the effectiveness of Policy DM12 is based upon whether planning permissions were found to be consistent with the policy. Although DM12 was a consideration in 21 applications during the monitoring periods (2020-2025), 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;
- For the 2022/23 – 2023/24 monitoring period, Policy DM13 was cited in 9 planning permissions; and
- For the 2024/25 monitoring period, Policy DM13 was not cited in any planning permissions.

Of 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.

Bircham Newton

During the 2024/25 monitoring period there have been no planning applications made on the CITC site. The most recent planning permission is noted as follows:

- CITC – Demolition of office building and construction of 3 new dwellings (16/00732/O and 17/01354/RM), consented September 2017).

However, since adoption of the SADMP (September 2016), outline applications for residential development to the east of the B1155 Bircham – Stanhoe road (references 19/01642/O, 19/01635/O, 18/01757/O) were all refused, by virtue of being contrary to the Local Plan countryside policies (CS06, CS08, DM3 and

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DM15).

RAF Marham

The most recent planning permissions at RAF Marham were for new air ground lighting masts for RAF Marham runway and associated access infrastructure (16/00759/F, 16/00757/F and 16/00332/F). These were all approved during summer 2016, shortly before adoption of the SADMP.

It should also be noted at RAF Marham significant construction work has taken place previously to accommodate its new fleet of jets.

Other Employment Indicators²

Indicator and Description	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21 & 2021-22	2022-23 & 2023-24	2024-2025
Employment Rate Rate of 16-64 population (previously working age)	78.2%	78.4%	79.8%	81.2%	83.2%	78.5%	83.4%	85.9%
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%	32.5%
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%	21.6%
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%	20.5%
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%	25.4%

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. For 2024 -2025 monitoring year, the data is based on July 2024 to June 2025 Census data.

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Indicator and Description	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21 & 2021-22	2022-23 & 2023-24	2024-2025
Earning by place of residents Gross weekly pay of all full-time workers	£497.9	£507.1	£516.5	£549.9	£559.4	£585.3	£650.6	£731.1

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

- Employment in the Borough continues to improve, rising from 83.4% in 2023-24 to 85.9% in 2024-25, the highest-level record in the monitoring period, which indicates a strong recovery after a dip during the COVID-19 Pandemic.
- Gross weekly pay increased significantly to £731.10, from £650.60 during the previous year, reflecting sustained wage growth and living wage adjustments.
- Occupational structure in the Borough demonstrates some variables:
 - High skilled roles (SOC 1-3) fell from 42.3% to 32.5%, a significant decline that could signal reduced professional opportunities or shifts within sector, whereas in contrary
 - Lower-skilled roles (SOC 8-9) rose from 22.1% to 25.4%, indicating a shift towards lower-skilled employment sector as reliance on manual and technical roles.
 - Lastly, administrative (SOC 4-5) and service roles (SOC 6-7) remained broadly stable when compared to previous years, which is possibly linked to tourism and hospitality sectors recovering from the Covid-19 Pandemic.
 - In summary, there appears to be widening gap between high skilled and low-skilled employment, which may indicate a degree of inequality in the Borough.
- The adopted Local Plan 2021-2040 will provide an additional 25 ha of employment land which will support future economic growth, and job creation across the Borough.

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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

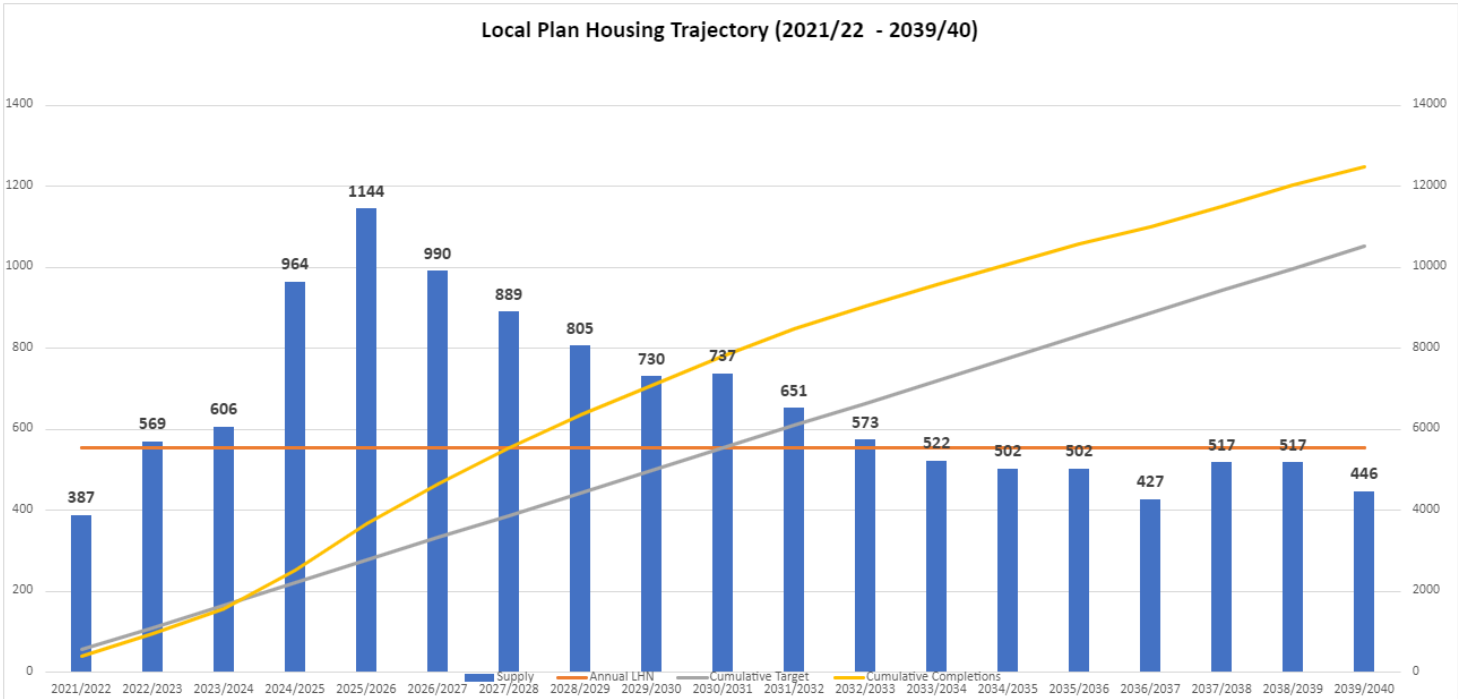
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Housing

Housing Supply

2024-2025 Housing Trajectory

The 2023/24 Housing Trajectory is shown below. This was incorporated into the new Local Plan 2021-2040.

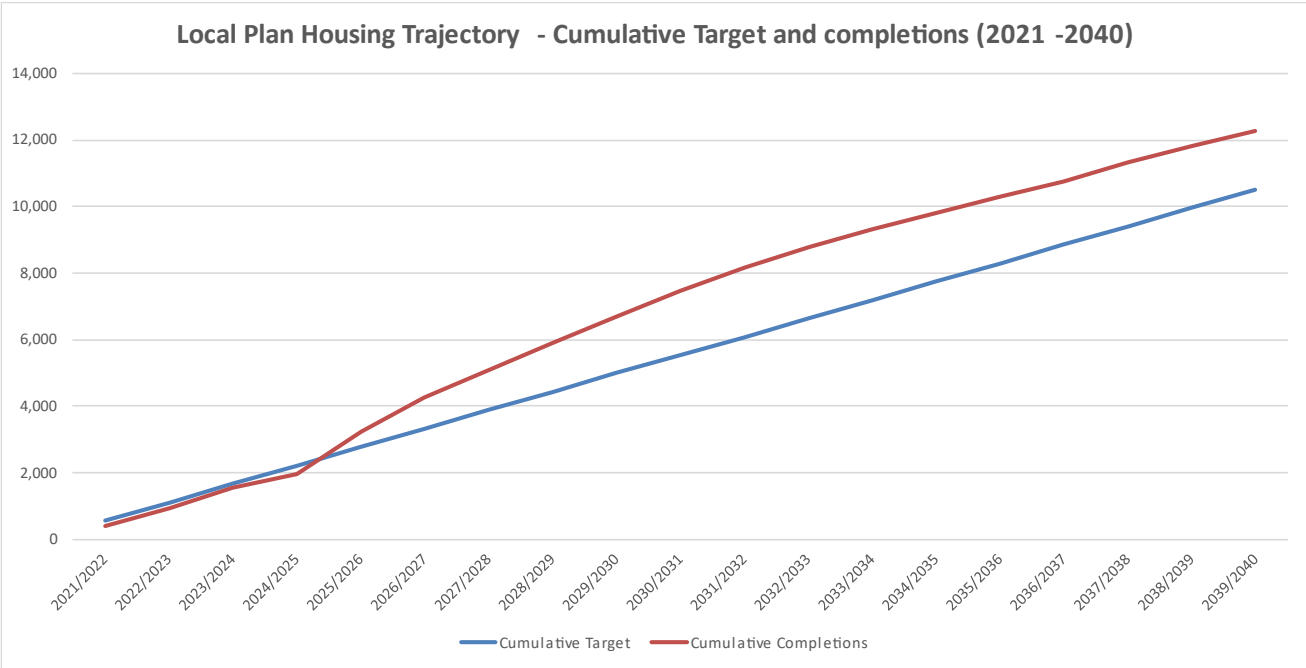
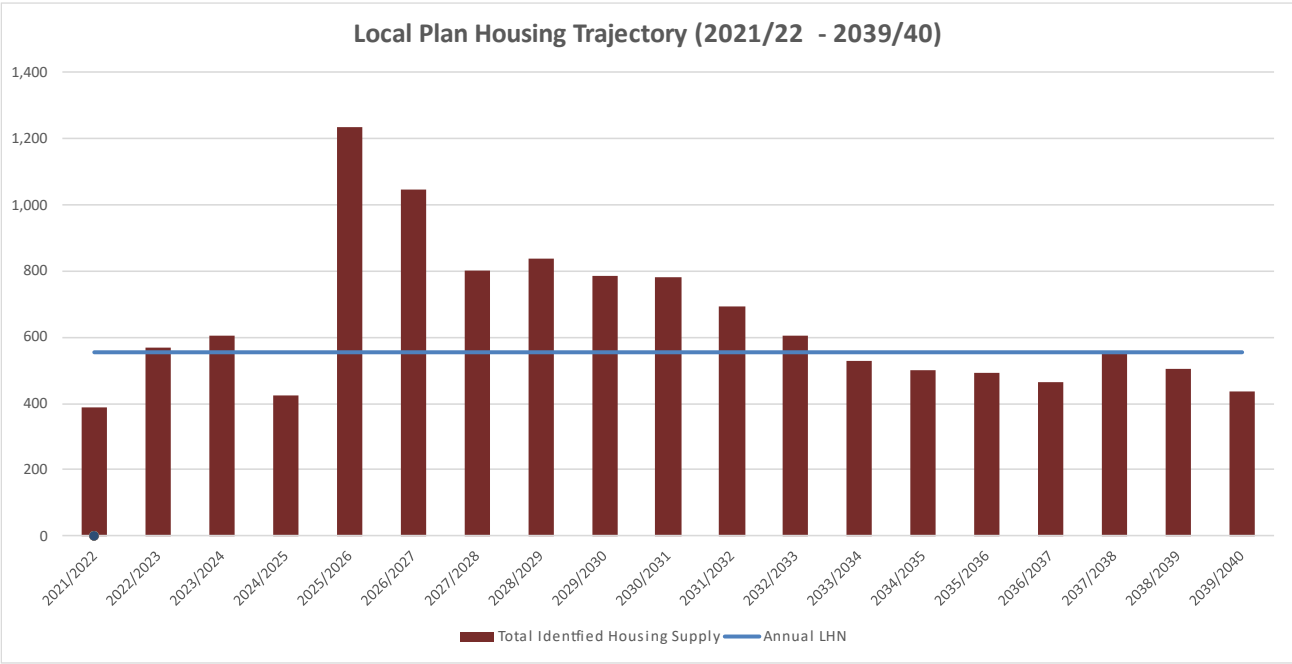


The 2021-2040 trajectory replaces the Borough-wide trajectory for 2001-2026, included in previous AMRs. The 2001-2026 trajectory showed the annual average completion rate which should be sustained until 2026, in order to meet the strategic requirement for housing, completions set by the 2011 Core Strategy (16,500 dwellings over 25 years). It should be noted that the Core Strategy requirement ceased to be the baseline for calculating housing land supply beyond the 2020/21 monitoring period switched to the Local Housing Need (LHN) calculated using the standard method; as over 5 years had passed since adoption of the SADMP in September 2016.

The trajectory graph is forward looking. It plots the Borough-wide housing trajectory for the new Local Plan period (2021 to 2040). This is based on the annual completions to date (shown in green) and those dwellings identified for completion to 2040 (shown in blue). In this graph, the annualised residual requirement (indicated via a yellow line) anticipates that 12,438 dwellings will be achieved, significantly exceeding the 2024 LHN figure (554 dwellings per year; 10,526 dwellings over 19 years).

An updated trajectory was prepared for the 2024/25 monitoring period³. The graphs below show the updated trajectory, and cumulative targets and completions (respectively).

³ https://www.west-norfolk.gov.uk/download/downloads/id/9602/housing_land_supply_trajectory_data_-_2024_to_2025.xlsx



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Five Year Housing Land Supply

The table below provides the five-year housing land supply calculation using a LHN of 554 dpa as of 2024/25, applying a 5% buffer as required by the NPPF.

LHN (554) x 5 (Years) (2025-2030)	2,770
LHN x 5 + 5% buffer (NPPF scenarios)	2,909
Identified Supply (4,569) / LHN x 5 + 5% buffer	1.57
Above x 5 (Years)	7.9

Housing Delivery

The table below shows completions, dating back to the start of the Core Strategy monitoring period. It shows annual completions, 2001-2025 and the total over the 24-year period.

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
2024/25	424
Total	13,024

Total completions over the period 2001-2025 equate to 13,024. This compares to the Core Strategy requirement for 15,840 over the same period.

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2023 Housing Delivery Test

The latest Housing Delivery Test (HDT) results (for 2023) were published on 12 December 2024 Ministry of Housing, Communities and Local Government (MHCLG). The initially published HDT stated that the Borough Council had achieved 60%, triggering a requirement to prepare a new HDT Action Plan and the presumption in favour of sustainable development (NPPF paragraph 11).

The 2022 HDT results, published by MHCLG on 19 December 2023, showed that the Borough Council achieved 90%, a trigger for the preparation of a new HDT Action Plan. Accordingly, the Borough Council prepared an updated HDT Action Plan, finalised in November 2024⁴, shortly before the Government's 2023 HDT results. The Borough Council's own anticipated/ interim 2023 calculation indicated a 2023 HDT result of 88% (thereby requiring preparation of a new HDT Action Plan).

In December 2024, the Borough Council launched a dispute with MHCLG, in response to the Government's 2023 HDT results. This was ultimately successful, due to a discrepancy arising from adjustments made by MHCLG/ Office of National Statistics (ONS) in response to the 2021 Census. The revised 2023 results were released by MHCLG in March 2025, showing a result of **87%**, requiring preparation of an HDT Action Plan during 2025⁵.

Previous Housing Delivery Test Results (since 2018)

As stated above, as of April 2025 the latest HDT data was published by MHCLG in December 2024 (revised/ updated in March 2025). This latest published result (87%) required the preparation of an HDT Action Plan, which was duly completed in November 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>

⁴ https://www.west-norfolk.gov.uk/download/downloads/id/9008/housing_delivery_test_action_plan_2024.pdf

⁵ https://www.west-norfolk.gov.uk/download/downloads/id/9423/housing_delivery_test_2023_recalculation_letter.pdf

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	90%	Action Plan	Replacement Action Plan prepared, published and agreed (November 2024) in response to 2022 result
2023 (latest, as of March 2025)	87%	Action Plan	Replacement Action Plan prepared, published and agreed (November 2024), incorporating indicative 2023 and 2024 HDT results. 2023 HDT results subsequently confirmed by MHCLG, March 2025.

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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 (2024/25), there were just over 400 dwellings (424) completions. Of these 106 were on previously developed land. This represents 25%. Of the 1,986 dwellings completed during the past 4 monitoring years (2021/2022-2024/2025), 499 took place on previously developed land. This represents a mean average **32%** of homes delivered over this period.

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

Indicator	2020/21	2021/22	2022/23	2023/24	2024/25
% of Dwellings completed on PDL	26%	42%	28%	35%	25%

Affordable Housing Delivery

Indicator	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
Affordable Housing Delivery	61	63	50	49	72	79*	202

* 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 in the most recent monitoring periods, with over 70 units delivered during each of the 2022/23 and 2023/24 periods. The 2024-2025 monitoring period was the most successful in recent years with 202 affordable units delivered, more than double the previous monitoring year.

Gypsy & Traveller Pitches⁶

Indicator	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
New Pitch Provision	0	5	0	4	5	3	5

The Gypsy and Traveller Accommodation Assessment (GTAA), published in June 2023, identified a significant need for additional pitches within the Borough to meet the requirement of these communities. In response, during the 2024-2025 monitoring year, 3 new planning permissions were granted which added 5 new Gypsy and Traveller pitches to the identified gap. While this represents progress, the scale of need highlighted in GTAA means that continued proactive delivery will be essential to achieve compliance with Local Plan policies and national guidance. It should be noted that the emerging Local Plan seeks to achieve this by making significant site allocations and providing an updated policy framework for the assessment of future windfall sites.

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

⁶ 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 \(MIQ416 - MIQ462\)](#))

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.

Base period	Base Period	Deadline for delivering need for each base period	No. on Register	C&SB over/ under Supply (-ve figures indicate shortfall/ under supply)
1	01/04/16 - 30/10/16	30/10/19	53	7
2	31/10/16 - 30/10/17	30/10/20	50	-24
3	31/10/17 - 30/10/18	30/10/21	48	-54
4	31/10/18 - 30/10/19	30/10/22	40	-82
5	31/10/19 – 30/10/20	30/10/23	41	-117
6	31/10/20 – 30/10/21	30/10/24	82	-167
7	31/10/21 – 30/10/22	30/10/25	32	Year 3 (2024-25) C&SB permissions not yet available
8	31/0/22 – 30/10/23	30/10/26	17	Years 2 and 3 (2024-26) C&SB permissions not available
9	31/10/23 – 30/10/24	30/10/27	14	Years 1, 2 and 3 (2024-27) C&SB permissions not yet available

The latest available data indicates that as of 30 October 2021 (the latest monitoring period for which full C&SB data (up to 30 October 2024) is available, there was a significant shortfall in C&SB permissions, compared to numbers of entries on the Register (167 dwellings shortfall). This has prompted the Borough Council to consider mechanisms for improving the C&SB monitoring regime.

The following actions are proposed through the forthcoming (2025-2026) monitoring period to address the shortfall:

- Possible removal of duplicate records on the C&SB Register, which arose at the time the Borough Council was hosting this for multiple local authorities;
- Introduction of a new policy in the replacement Local Plan 2021-2040 (LP31), to support C&SB delivery; and

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- Preparation of an annual Custom and Self-Build Position Statement, to supplement the C&SB Action Plan and explain how C&SB Register entries and planning permissions will be recorded and monitored, going forward from Base Period 10 (31/10/2024 – 30/10/2025).

Further information regarding the Borough Council's approach to Custom and Self-Build can be found via the Planning Policy C&SB web page:

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

Our web pages also include a separate link regarding the C&SB register, please see the link below:

- https://www.west-norfolk.gov.uk/info/20001/housing/255/custom_and_self-build_housing.

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Average House Prices

Indicator	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
Mean house prices at the end of Q4	£215,612	£213,666	£216,105	£258,307	£278,252	£281,373	£271,531

Since 2020/21, average house prices saw an increase, up until 2023/24. However, during the current (2024/25) monitoring period, these reduced by around £10,000.

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 counting new permissions creating net additional dwellings. For example, consents for Reserved Matters, Variations of Conditions (i.e. already consented schemes), replacement dwellings and prior approvals are discounted.

Indicator	2021/22	2022/23	2023/24	2024/25
Total No. of Homes Granted Planning Permission within the Borough	935	879	854	424
Planning Permission for homes Granted Outside Development Boundaries	39	32	32	19
% Outside of Development Boundaries Granted Planning Permission	4.2%	3.6%	3.7%	4.4%

In 2024/25, a total of 424 new homes were granted planning permission within the Borough. Of these, 19 homes or 4.4% were approved outside development boundaries. Whilst this represents an increase in the percentage of planning permissions granted outside development boundaries, when compared to the previous two years the actual number is lower.

The proportion of permissions granted outside development boundaries remains above the Core Strategy's indicative figure of 2% for Smaller Villages and Hamlets and the countryside, but has varied between 3.5% and 4.5% since 2021.

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These consents include rural exception schemes, rural worker's dwellings and development within Smaller Villages and Hamlets, consistent with Policy DM3. Overall this reflects the ongoing focus on directing growth to higher order settlements as set out in Policy DM2, while accommodating limited rural housing needs in line with national policy provisions and permitting the re-use of redundant or disused buildings in rural areas.

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 (addressed through Policy DM5).

Year	2021/22	2022/23	2023/24	2024/25
Total No. of Homes Granted Planning Permission within the Borough	935	879	854	424
Homes granted planning permission in Smaller Villages and Hamlets	27	16	10	21
% of all permissions	2.9%	1.8%	1.2%	4.9%

Policy DM3 supports modest growth in lower tier settlement without defined development boundaries, the data shows that permission in these areas remain limited, with an average mean of 2.7% of total planning permissions granted over the last 4 monitoring periods.

Annual figures for last 4 years vary from 2.9% (2021/22), 1.8% (2022/23), 1.2% (2023/24) and 4.9% (2024/25) indicating a recent increase in permission granted within the smaller settlements.

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	2021/22	2022/23	2023/24	2024/25
Permission	3	1	3	1
Location	King's Lynn (3)	Emneth (Wisbech) (1)	King's Lynn (3)	King's Lynn (1)

Monitoring shows very limited activity, with only 8 planning permissions granted over four years. Most

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consents were granted in King`s Lynn (7) and one in Emneth (Wisbech). Annual figures represent a consistently low level of HMO developments across Borough.

Policy DM5 – Enlargement or Replacement of Dwellings in the Countryside

Policy DM5 sets out the criteria for which this type of development could 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	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
Replacement dwellings	8	8	21	21	16	15

Policy DM5 aims to ensure that enlargement or replacement dwellings in the countryside is acceptable under its criteria. Monitoring demonstrates that planning permissions for replacement dwellings in countryside have increased from 8 in 2019/20 to 21 in 2021/22. In 2024/25, 15 permissions were granted which is within the range, as seen since 2021/22. Additionally, there were recorded 58 planning permissions for enlargement of dwellinghouses in the countryside.

Inevitably there are a significant number of replacement dwellings delivered, due to the Borough being predominantly a rural area. Applications are all assessed against the Policy DM5 criteria. The most recent data shows a significant increase since 2019/20, following which delivery of replacement dwellings has been broadly consistent.

Policy DM6 – Housing Needs of Rural Workers

This policy is monitored 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); and
- Temporary occupational dwellings (DM6 criteria 4-5); and
- Removal/ relaxation of occupancy restrictions (DM6 criteria 6-7).

Year	2020/21	2021/22	2022/23	2023/24	2024/25
New and permanent occupational dwellings	0	6	1	3	3
Temporary occupational dwellings	3	2	4	3	0
Removal/relaxation of occupancy restrictions (existing occupational dwellings)	-3	-3	-3	-2	-4
TOTAL	0	5	2	4	-1

Monitoring shows that Policy DM6 has delivered modest and inconsistent levels of rural worker housing over the five-year period. While there were peaks in new permanent dwellings (notably six in 2021/22), overall provision remains low, and temporary dwellings had declined to zero by 2024/25.

In 2024/25, the total net figure for housing for rural workers is minus 1, primarily because four applications were approved for removal or variation of agricultural occupancy restrictions. Although three new rural worker dwellings were permitted, these relaxations effectively transferred existing agricultural housing stock into the general market housing stock, reducing the net provision for rural workers.

This trend highlights a mixed picture: Policy DM6 enables new supply, but occasional offsets by relaxations of occupancy conditions, can undermine the long-term availability of housing for rural workers.

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	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
Annex No.	5	31	43	24	30	25

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, likely reflecting the Covid-19 pandemic and associated emergency legislation, when household mixing was severely curtailed and in response many property owners sought to bring extended family into their own households.

In 2024/25, a total of 25 residential annexes were granted continuing to demonstrate demand for flexible living arrangements. Most permissions involved conversions of existing buildings such as outbuildings or garages into living accommodation (15).

Furthermore, there was one application for a replacement annex, with three permissions granted through variation of conditions or change of use applications. Seven new annexes were approved as changes of use, demonstrating a mix of adaptation and new provision in the borough in the last monitoring year.

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 emerging replacement 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 2025).

The most recent neighbourhood plan to be adopted during the 2024-25 monitoring period was the Ringstead Neighbourhood Plan 2021-2036 (February 2025). Although this does not designate specific community facilities through a policy, these are nevertheless highlighted in section 5, including features such as the pub, general store, playing field and bowling green (section 5/ para 186) of the Ringstead Neighbourhood Plan 2021-2036.

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	Policy 6.1: Community Assets	2

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Neighbourhood Plan	Date "made"	Policy	No of community facilities/ services explicitly covered in Neighbourhood Plan policies
Upwell	Jul-21	Community Infrastructure Policy P2: Primary School	1
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, 606 dwellings completed in 2023/24, and 424 dwellings completed in 2024/25. The dip suggests slowdown in completions, though overall delivery since 2021 remains strong.
- A significant proportion, in the region of 30%+ of new homes, were delivered on previously developed land also known as brownfield land.
- The revised 2023 Housing Delivery Test (HDT) results at 87%, below the 95% threshold, which triggered the need for an updates HDT Action Plan. The Borough Council has prepared, agreed, and published a new HDT Action Plan in November 2024, ensuring compliance with national policy.
- The Borough Council maintains a healthy five-year supply position (7.9 years), which is well above the NPPF requirements.
- The Borough Council has delivered a record number of 202 affordable units in 2024/25 monitoring year, more than double in comparison to previous years, making a significant progress in meeting local housing needs.
- Five new Gypsy and Traveller pitches (three sites) were permitted in 2024/25 contributing to identified needs but highlighting the ongoing requirement for proactive delivery to meet GTAA targets.
- Monitoring continues to show a substantial shortfall of Custom and Self-Build housing against registered demand.
- Policies:
 - **DM6 (Rural Workers Housing):** Net provisions fell to minus 1 in 2024/25 due to four relaxations of occupancy restrictions, despite three new dwellings being approved. This indicates a risk of losing specialist housing stock to the general market.
 - **DM7 (Residential Annexes):** Total of 25 annex permissions were granted, the majority of which were conversions of existing buildings which indicates that there is a need for flexible, multi-generational living arrangements.
 - **DM9 (Community Facilities):** Continued success in enabling Neighbourhood Plan to protect local facilities in addition to existing Local Plan policies, with 13 Plans explicitly designating 117 community assets.

This report covers the final monitoring period for the Core Strategy (2011) and SADMP (2016)

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

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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; although local authorities do 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 resulted in two AQMA's in King's Lynn, in 2003 (extended 2005) and 2009 (for extent of areas see maps within Appendix C of the Borough Council's Annual Status Report 2025⁷). Both are related as they form part of an arterial route through King's Lynn (A148), linking Southgates (south) and Austin Street/ John Kennedy Road (north). Railway Rd AQMA exceedances have been a result of a street canyon type effect; whereas the Gaywood Clock AQMA has been more to do with high volumes of traffic on each of the respective arms of the junction.

AQMA Review (2023-25)

During 2023-24, the Borough Council began the process for reviewing the two AQMAs. The findings of this review were set out in the updated Air Quality Action Plan (AQAP), September 2024⁸ and are summarised as follows:

- **Railway Road AQMA** – NO₂ levels are much improved, with the last annual mean NO₂ exceedance occurring in 2019 i.e. pre-Covid. Whilst there has been this improvement it is not proposed to revoke this AQMA until there is better understanding the impacts from transport schemes (e.g. Town Centre's Gyratory system), in conjunction with the West Winch Growth area.
- **Gaywood Clock junction AQMA** – Due to the continued period of compliance and no significant changes being identified in new developments or from changes in traffic, the decision was taken to revoke Gaywood Clock AQMA, the last exceedance having been observed in 2010 (confirmed February 2025).

Air Quality Action Plan update

Given that the Railway Road AQMA remains in force, it has been necessary for the Borough Council to produce an updated AQAP (2024-2029). This was published in September 2024 and replaces the earlier (2015) AQAP. Significant air quality improvements have been noted, prompting the revocation of the Gaywood Clock junction AQMA.

The 2024 AQAP attributes these to projects delivered through the 2015 AQAP, including:

- Improvements at the King's Lynn transport (bus-rail) interchange in the town centre that incentivises the use of public transport and active travel.

⁷ BCKLWN, Annual Status Report 2025; https://www.west-norfolk.gov.uk/download/downloads/id/9621/air_quality_annual_status_report_2025.pdf

⁸ https://www.west-norfolk.gov.uk/download/downloads/id/8893/air_quality_action_plan_2024-2029.pdf

- Urban traffic control and selective vehicle detection systems being implemented to help reduce congestion and pollution levels in the town centre and where the AQMA's are located.
- Installation of electric vehicle (EV) charging points within Council owned car parks across the district (18 double charging points installed to date and a further 8 to be commissioned) to help assist local residents with no off-street parking provision the opportunity to charge their electric vehicle overnight at one of the selected sites. Previously installed 50kW rapid EV charging points (4) have recently been replaced with newer units.

The AQAP focuses upon the impacts of air pollution upon public health. It highlights impacts on lung development in children, heart disease, stroke, cancer, exacerbation of asthma and increased mortality, among other health effects. Critically, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues because areas with poor air quality are also often the less affluent areas.

In addition to the updated AQAP, the replacement Local Plan 2021-2040 proposes the development of a Borough-wide Air Quality Management Strategy. This will be developed in conjunction with Natural England, in line with the National Air Quality Strategy⁹, but will focus upon ecological matters.

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, 2021¹⁰) or 29% as shown within this Council's CO₂ emission inventory¹¹. Domestic GHG emissions from transport have been broadly flat for the last 30 years (DfT, 2021¹⁰) 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 this 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 AQMAs. Bus improvements also support the active travel. The 2024 AQAP recognises that significant air quality improvement have been made, but remains focused upon prioritising measures that are associated with reducing traffic as vehicles were identified as the predominant source of NO_x / NO₂.

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, 2017¹²) 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 2025 Air Quality Annual Status Report provides a

⁹ <https://www.gov.uk/government/publications/the-air-quality-strategy-for-england/air-quality-strategy-framework-for-local-authority-delivery>

¹⁰ 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

¹¹ BCKLWN; Overview of 2018 District Emissions; https://www.west-norfolk.gov.uk/info/20095/energy_and_climate_change/920/west_norfolk_emissions

¹² IAQM, Institute of Air Quality Management, 2017, Planning for Air Quality; <https://iaqm.co.uk/guidance/>

summary of the planning applications reviewed within the year and interventions.

Air Quality Monitoring (Annual Status Report)

The Borough Council continues to monitor key pollutants, which have the most significant impacts upon human health. These are:

- **NO₂** – Generally emitted from high-temperature combustion processes such as road transport or energy generation.
- **Sulphur Dioxide (SO₂)** – Corrosive gas which is predominantly produced from the combustion of coal or crude oil.
- **Particulate Matter (PM₁₀ and PM_{2.5})**¹³ – Everything in the air that is not a gas; can come from natural sources such as pollen, as well as human made sources such as smoke from fires, emissions from industry and dust from tyres and brakes.

Since 2021, steady air quality improvements were noted; e.g. 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 data¹⁴ 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.

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.

The updated (2025) Air Quality Annual Status Report, containing the latest monitoring data (up to 2024) has recently been published, in fulfilment of Part IV of the 1995 Environment Act (Local Air Quality Management), as amended by the Environment Act¹⁵. This provides the latest Annual Mean NO₂ Monitoring results, from over 100 monitoring sites in:

- AQMA's – 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.

Notwithstanding, this update for the Local Authority Monitoring Report reflects the AQAP's continued focus upon Railway Road AQMA (NO₂-based).

In addition, as of April 2025, there are 8x Smoke Control Areas designated in the King's Lynn area¹⁶ 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 2025 Annual Status Report has been collated and summarised below. Indicative annual monitoring results from monitoring sites in the Railway Road and Gaywood Clock AQMA's (the latter

¹³ PM₁₀ refers to particles under 10 micrometres. Fine particulate matter or PM_{2.5} are particles under 2.5 micrometres.

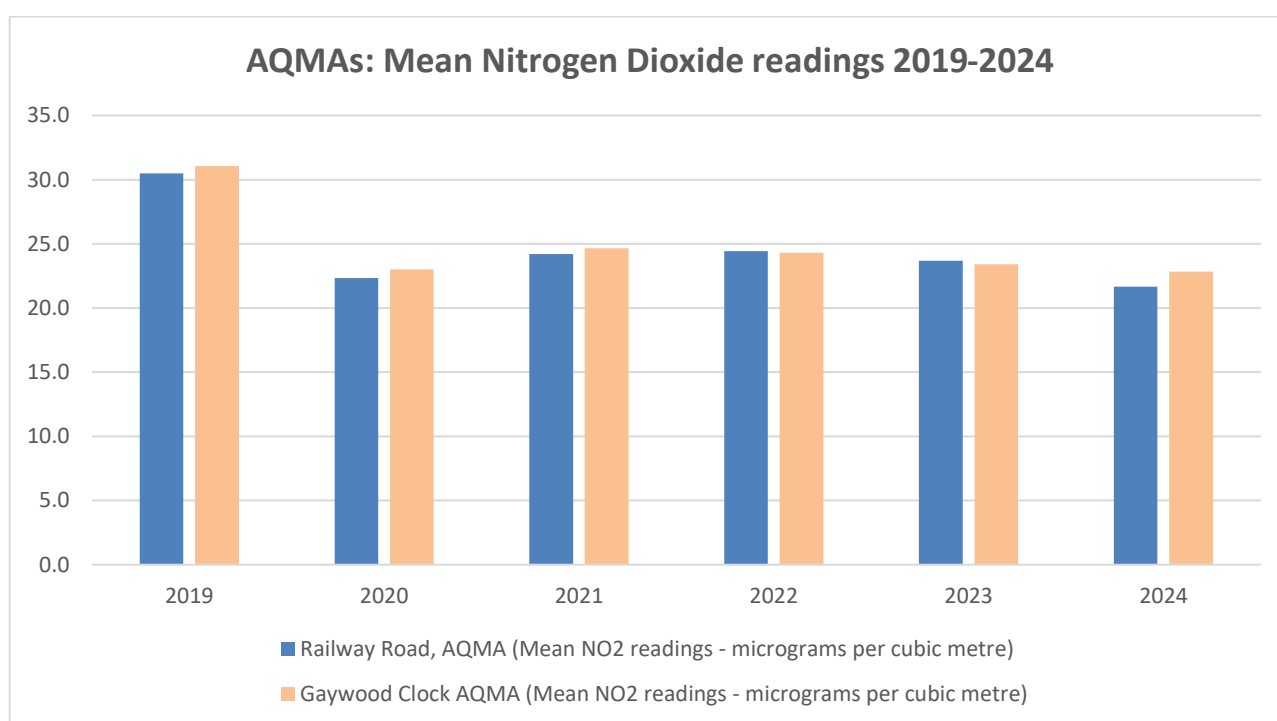
¹⁴ BCKLWN AQ Real-time monitoring results; https://www.west-norfolk.gov.uk/info/20137/air_quality/171/air_pollution_levels

¹⁵ https://www.west-norfolk.gov.uk/download/downloads/id/8811/air_quality_annual_status_report_2024.pdf

¹⁶ BCKLWN; Smoke Control Areas; https://www.west-norfolk.gov.uk/homepage/309/smoke_control_areas

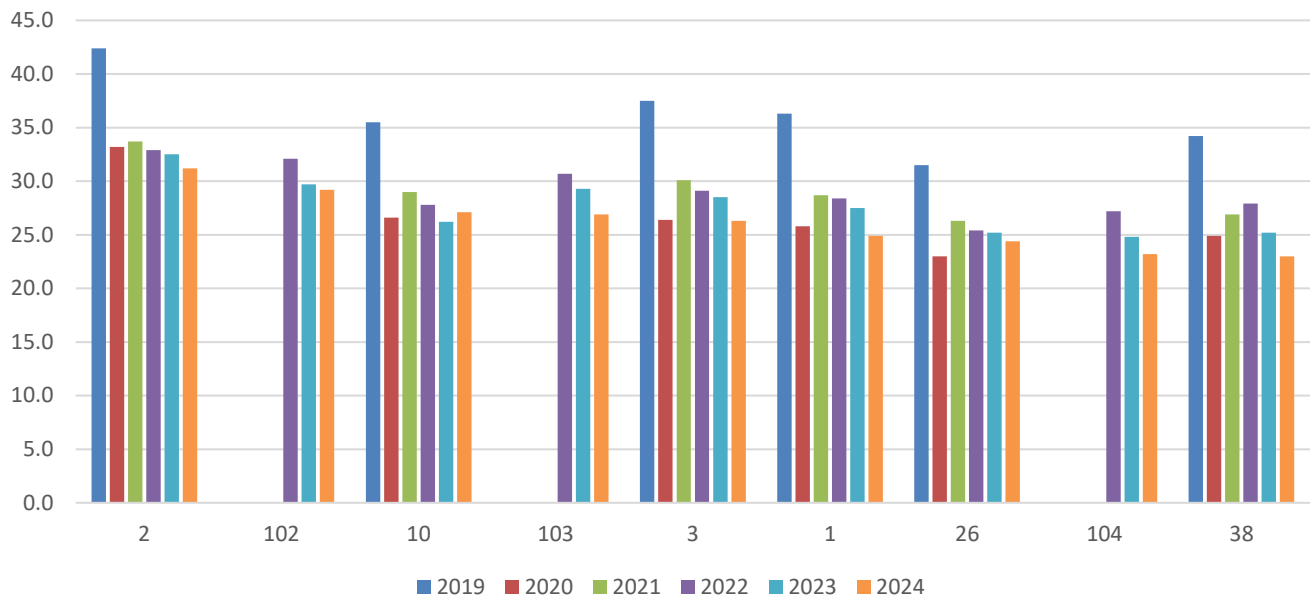
having been revoked during the 2024-25 monitoring period, following the Borough Council's adoption of the 2024 AQAP) are shown below, with mean average figures for each area shown in graph form.

	2019	2020	2021	2022	2023	2024
Railway Road, AQMA (Mean NO₂ readings - micrograms per cubic metre)	30.5	22.3	24.2	24.4	23.7	21.7
Gaywood Clock AQMA (Mean NO₂ readings - micrograms per cubic metre)	31.1	23.0	24.6	24.3	23.4	22.8

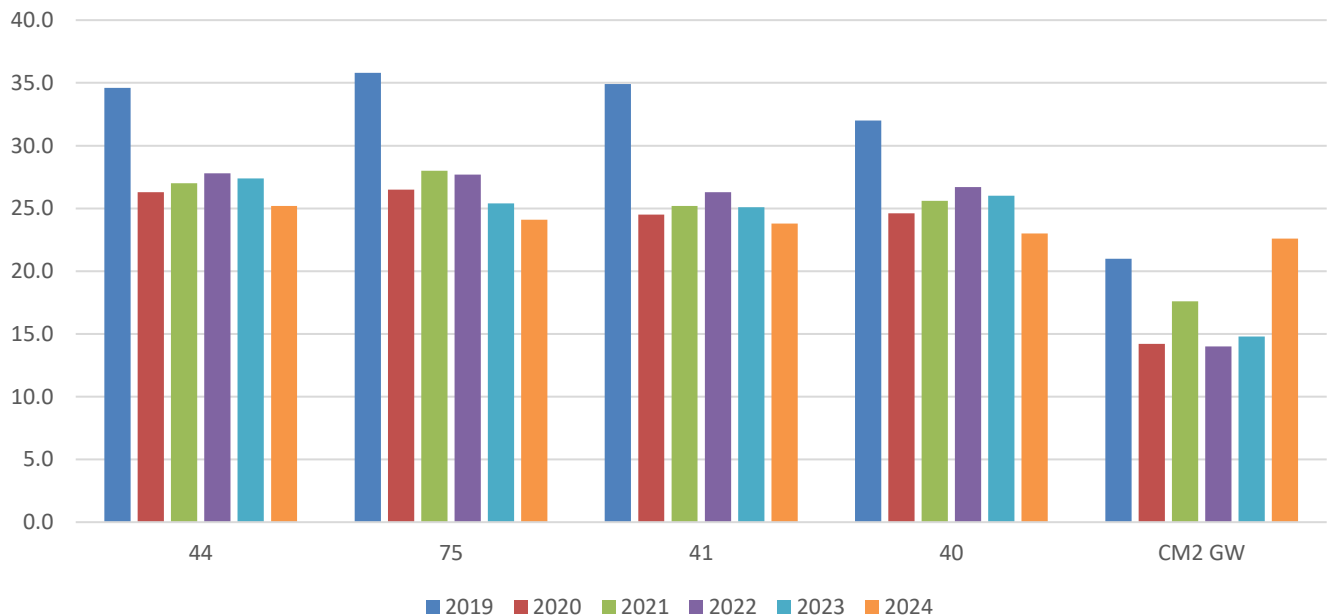


This report covers the final monitoring period for the Core Strategy (2011) and SADMP (2016)

Railway Road AQMA - NO₂ (micrograms per cubic metre) readings from highest 10 (2024) monitoring stations (x axis = year; y axis = readings)



Gaywood Clock AQMA - NO₂ (micrograms per cubic metre) readings from highest (2024) 5 monitoring stations (x axis = year; y axis = readings)



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The 2019-2024 graphs show a stark reduction in NO₂ emissions between 2019 and 2020 at all stations, 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 nevertheless saw continued reduction during 2023. Continued emissions reductions for 2024 were observed at all the top 10 monitoring stations within the Railway Road AQMA. However, a significant increase in emissions at station CM2 (Gaywood Clock) was noted for 2024, although this may be an anomaly, as all other stations have shown a decrease on the 2023 data.

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.

The 2024 data, demonstrates overall air quality improvements within the AQMAs, with the Gaywood Clock order having recently been revoked (February 2025). Separate work regarding the impacts of air quality for the natural environment (particularly designated European sites) will be addressed through separate air quality strategies (developed in association with Natural England), as the replacement Local Plan 2021-2040 is implemented (from 2025-2026 onwards).

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 Lode¹⁷);

Flood risk management responsibilities for other watercourses are 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. No such information is available for 2024/25, although it is likely that numbers of planning permissions granted directly contrary to Environment Agency advice is negligible.

In such individual situations, it may be that the EA objection, officer report and formal decision should be read in full to understand 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 rivers and the sea.

National policy and guidance regarding flooding is now contained within the National Planning Policy Framework (NPPF) and the associated Planning Practice Guidance (PPG). The PPG was updated alongside the December 2024 NPPF, with further subsequent updates in September 2025¹⁸.

The aim of national policy and guidance 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 Norfolk County Council (Lead Local Flood Authority)¹⁹.

¹⁷ https://www.west-norfolk.gov.uk/site/custom_scripts/static_content/strategic_flood_risk_assessment/additional_documents/Appendix_B_Watercourses.zip

¹⁸ <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

¹⁹ <https://www.norfolk.gov.uk/article/39041/Local-Flood-Risk-Management-strategy>

In determining planning applications which have a flood risk issue, the Borough Council is required 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.

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 SFRAs 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.

The latest version of SFRA was amended in spring 2024, which informed adoption of Local Plan 2021-2040 and the site allocations for Gypsies, Travellers and Travelling Showpeople.

[https://www.west-norfolk.gov.uk/info/20216/local_plan_review_2016 - 2036/1097/level 2 sfra addendum gypsy and traveller sites](https://www.west-norfolk.gov.uk/info/20216/local_plan_review_2016_-_2036/1097/level_2_sfra_addendum_gypsy_and_traveller_sites).

During 2025/26 it is proposed that the Borough Council will commission a new SFRA, given that the current published version is already 6-7 years old (Level 2 and Level 1 SFRAs, respectively). This is expected to be a core evidence base document to support a new Local Plan, which is anticipated to launch in 2026.

Environment Agency

The Environment Agency (EA) is a statutory consultee on planning applications involving flood risk. The Agency has flood risk responsibilities for designated main watercourses (e.g. Rivers Great Ouse, Nar and Wissey). The EA 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.

This report covers the final monitoring period for the Core Strategy (2011) and SADMP (2016)

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 few years, water quality has become a significant issue and a 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.

	2020	2021	2022	2023	2024	2025
Conservation Areas	43	43	43	44	44	44
Listed Buildings	1933	1933	1933	2008	2008	2002
Scheduled Monuments	129	129	129	132	132	133
Historic Parks Gardens	6	6	6	6	6	8
Ancient Woodlands	23	23	23	23	23	37

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.

Most recently (2023), a new King's Lynn Conservation Area was designated, while 75 new Listed Buildings (also referred to as "designated heritage assets") were designated by 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 provides advice on works which required Listed Building Consent including:

- pre-application advice

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- 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. In the 2024/25 monitoring year out Conservation Team dealt with 73 Listed Building Applications. While this represents a reduction in formal applications, it may reflect the teams proactive approach in providing high-quality pre-application advice which helps applicants to resolve issues at early stages and reduces the need for formal submissions.

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 the character statements are becoming outdated, and a lack of internal resources and funding has meant that these will likely not be updated in the foreseeable future.

Non-Designated Heritage Assets

National planning policy (NPPF) makes provision for local lists of non-designated heritage assets (NPPF para 216/ Annex) to be prepared. The Borough Council does not have a local list of non-designated heritage assets (NDHAs). However, several "made" neighbourhood plans include their own lists of NDHAs; details are set out in the table below.

Neighbourhood Plan	No of NDHAs	Policy reference
Castle Acre Neighbourhood Plan 2022-2036	18	HE.1
Gayton and Gayton Thorpe Neighbourhood Plan 2019-2036	29	G4
Holme-Next-The-Sea Neighbourhood Plan 2016-2036	59	HNTS13
Hunstanton Neighbourhood Development Plan 2020-2036	19	K2
North Wootton Neighbourhood Development Plan 2022-2036	4	14
Old Hunstanton Neighbourhood Plan 2021-2036	50	3
Ringstead Neighbourhood Plan 2021-2036	13	13
Sedgeford Neighbourhood Development Plan 2017-2036	3	E5
Stoke Ferry Neighbourhood Plan 2022-2036	75	SF6
Thornham Neighbourhood Development Plan 2020-2036	14	HA2
Tilney All Saints Neighbourhood Plan 2020-2036	5	2.1
Upwell Parish Neighbourhood Plan 2015 to 2036	3	ET2/ P2/ P4
Watlington Neighbourhood Plan 2019-2036	21	12
North Runcion & West Winch Neighbourhood Plan 2016-2036	7	WA02
TOTAL	320	

Borough-wide, a total 320 separate NDHAs are listed through neighbourhood plans. Notwithstanding, other buildings may be considered NDHAs, even if not explicitly identified through a neighbourhood plan.

Monitoring/Action

The Borough Council should 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.

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.

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. These legal obligations are set by a range of legislation, including:

- Wildlife and Countryside Act 1981 (as amended);
- Conservation of Habitats and Species Regulations 2017 (as amended); and
- Environment Act 2021.

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 managing 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 contains a policy (CS12) relating to Biodiversity and Geodiversity. The 2021 Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GI-RAMS) and 2024 GI-RAMS Action Plan²⁰ set out how development can be coordinated at a strategic (county-wide) level, to ensure no adverse effects are caused to Habitats Sites (also called European sites) across Norfolk, either alone or in-combination, from qualifying developments.

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.

The replacement Local Plan 2021-2040 was similarly supported by a full Habitat Regulations Assessment (May 2021), submitted with the Plan in March 2022²¹. This identified likely significant effects arising from the new Local Plan relating to:

- **Loss of supporting habitat/ functionally-linked land** (Breckland SPA, Ouse Washes SPA/Ramsar, the North Norfolk Coast SPA/Ramsar and the Wash SPA/Ramsar)
- **General urban effects and avoidance of buildings by Stone Curlew** (e.g. Breckland SAC/SPA,)

²⁰ https://www.west-norfolk.gov.uk/homepage/379/habitat_mitigation_girams

²¹ https://www.west-norfolk.gov.uk/download/downloads/id/6634/kings_lynn_and_west_norfolk_habitats_regulations_assessment_draft_document_270521.pdf

- **Recreation impacts** (e.g. Breckland SPA/SAC, Roydon Common & Dersingham Bog SAC)
- **Water-related impacts** (e.g. River Wensum SAC, Ouse Washes SAC/SPA/Ramsar, the Norfolk Valley Fens SAC)
- **Air quality** (e.g. Roydon Common & Dersingham Bog SAC, Dersingham Bog Ramsar, North Norfolk Coast SAC/SPA/Ramsar)

The impacts of both the SADMP and replacement Local Plan 2021-2040 are deemed significant by the respective HRAs. 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).

Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy

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

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

The 2021 GIRAMS was updated in June 2024, with the publication of the Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan, which sets out detailed actions relating to mitigation measures arising from development proposals:

https://www.west-norfolk.gov.uk/download/downloads/id/7867/girams_strategy_-_march_2021.pdf.

Implementation of the GI-RAMS formally commenced with the introduction of the new GIRAMS 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 GIRAMS tariff incomes, while the partnership mechanism allows for monies to be spent on specific GIRAMS mitigation projects.

Details of GIRAMS incomes and outgoings the first three years since the commencement of GIRAMS (1 April 2022 – 31 March 2025) 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. By the 2024-25 financial year, virtually all HMMP monies were spent.

	GI-RAMS incomes	GI-RAMS incomes	GI-RAMS outgoings/ payments	Difference (surplus)
01/04/2022 - 31/03/2023	Norfolk GIRAMS	£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 GIRAMS	£146,253.00		
	BCKLWN HMMP	£11,634.00		
	TOTAL	£157,887.00	£26,357.00	£131,530.00
01/04/2024 - 31/03/2025	Norfolk GIRAMS	£73,814.00		
	BCKLWN HMMP	£17,276.00		
	TOTAL	£91,090.00	£296,999.00	£-205,909.00
			TOTAL SURPLUS	£-17,335.00

The data demonstrates healthy levels of developer payments secured through GIRAMS and its predecessor (HMMP). The expenditure on developer contributions looks distorted because the Borough Council paid £250,000.00 to Norfolk County Council (NCC) during last financial year which we collected on their behalf. The amount paid to NCC is not the full amount collected to date as some of the income is kept in reserves for possible refunds. Other expenditure in 2024/25 monitoring year includes £27,049.00 for Plovers in Peril, which was an older HMP project from 2021/22 and further £19,950.00 were refunded back to the developers. During 2024/25 monitoring year there was a small deficit of £17,335.00.

Accordingly, the Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan was published in June 2024. This was prepared 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 have 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.norfolkbiobiodiversity.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. It is anticipated that

This report covers the final monitoring period for the Core Strategy (2011) and SADMP (2016)

much of the direction and guidance provided by the BAPs will be covered by the Local Nature Recovery Strategy (LNRS), when this is adopted (anticipated autumn 2025).

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).
- **Local Nature Recovery Strategy (LNRS)** – The Environment Act set a requirement to produce a national framework for nature recovery, through the preparation of 48 LNRSs across the country. The LNRS will function as a toolkit, identifying priorities and actions for restoring and enhancing nature across Norfolk. In early 2024 the Norfolk and Suffolk Local Nature Recovery Partnership (NRP) was set up, to coordinate preparation of LNRSs for the counties of Norfolk and Suffolk.

Preliminary work on preparation of the LNRS was ongoing through 2024, followed by publication of the preliminary draft Norfolk and Suffolk LNRSs in January 2025. Full public consultation was scheduled to take place from April – June 2025, with adoption of the LNRS anticipated by autumn 2025. When adopted (expected November 2025), the LNRS will play a crucial role in reversing biodiversity loss, helping adapt to a changing climate and ensuring sustainable land use that benefits people and wildlife.

During the 2023-2024 financial year, the Borough Council appointed an ecologist, to provide in-house expertise about how Nutrient Neutrality, BNG and the LNRS can be properly coordinated and implemented. This process has continued throughout 2024-2025 and will continue through the 2025-2026 monitoring period. In particular, it will be bolstered from early 2026, once the Norfolk LNRS is rolled out.

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)

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

2024/25

Planning Ref.	Description
24/00562/F	Installation of a solar array and battery storage facility with associated infrastructure, to provide zero-carbon energy for Estate use (Land At E569916 N329201 And S of Admirals Drive Sandringham)
24/01034	The installation of 260No. roof mounted solar PV panels of total installed capacity 111.8kWp. (Snap-on 13 - 17 Denney Road Hardwick Industrial Estate King's Lynn)
24/01757/F	Installation and operation of 214kW of ground-mounted solar to power the irrigation system associated with Pooly Farm. (Land At E575727 N295931 Thetford Road Northwold)

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 was 20. Between the 2023/24 and 2024/25 period, this number was 19. 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 2022/23 – 2023/24 monitoring periods, Policy DM16 was cited in 8 planning permissions.
- For the 2024/25 monitoring period, Policy DM16 was cited in 9 planning permissions.
- Overall, within the previous 4 annual monitoring periods, Policy DM16 was cited in 22 Planning permissions

Year	2021/22	2022/23	2023/24	2024/25
No of planning permissions triggering recreational open space requirements	5	4	4	9

Permissions can trigger open space contributions during a monitoring period, but do not provide open space contributions due to on-site constraints, meaning that delivery of on-site open space in accordance with the requirements of Policy DM16 necessitates off-site contributions instead.

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

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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 2022/23 – 2023/24 monitoring periods, 5 planning permissions for new dwellings or changes to occupancy conditions were granted; and
- FOR 2024-2025 = 0.

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

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

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;

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and

- For the 2024/25 monitoring period, no planning permissions cited DM22.

Year	2021/22	2022/23	2023/24	2024/25
No of planning permissions citing DM22 re the protection of open space	4	3	1	0

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
Grimston, Pott Row, Roydon and Congham	Aug-24	Policy 11: Local Green Space	13
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
Ringsstead	Feb-25	Policy RNP 8: Local Green Space	8
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	112

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As of April 2025, 112 Local Green Spaces were designated through “made” neighbourhood plans. Neighbourhood plans that have subsequently come forward during the 2024/25 monitoring period (Syderstone and The Walpoles) will include further Local Green Spaces.

Environment Conclusions

- Air quality in West Norfolk has remained very good; with continued improvements in the remaining Railway Road AQMA (King’s Lynn) where, in common with many areas within the UK, the monitoring has continued to identify high (albeit decreasing) 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).
- Although the Borough Council does not maintain local listings for non-designated heritage assets (NDHAs), many neighbourhood plans include NDHA lists. 320 NDHAs are explicitly designated in this way.
- 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

As of the 2024/25 monitoring period, the Borough Council's current Local Plan comprised the Core Strategy (CS) (adopted in 2011) and the Site Allocations and Development Management Policies Plan (SADMP) (adopted in 2016). The CS set 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, with the commencement of a Local Plan review following shortly after (October 2016).

Local Development Scheme

The Local Development Scheme (LDS) sets out what individual Local Development Documents the Council will prepare, together with a timetable for their production. An 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 April 2024, as required by the Local Plan examination Inspectors. The 2024 LDS anticipated adoption of the new Local Plan 2021-2020. This deadline was achieved, with adoption by the Council on 27 March 2025.

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/J			

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

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Indicative Local Development Scheme (March 2025)

Around the time of publication of the Local Plan Inspector's Report (February 2025), the Government (MHCLG) directed local authorities to produce an updated LDS, by March 2025. In response, the Borough Council produced an Indicative LDS, based upon guidance around the new plan-making system (to be introduced through the 2023 Levelling Up and Regeneration Act and 2025 Planning and Infrastructure Bill).

The indicative LDS was prepared and published in accordance with the MHCLG guidance about the proposed new plan-making system that was available at the time. It is set out in the table below (extract reproduced from the Indicative LDS).

Stage	Task	Likely period of preparation
Notice Period for scoping and early participation	This includes requirements to "notify" the public and stakeholders including statutory bodies and "invite" participation; prepare or update the local plan or minerals and waste timetable; and give a minimum of four months' notice before they intend to formally commence the 30-month plan preparation timeframe through to adoption	Autumn 2025 pre-commencement notification period
Stage 1 – Plan visioning and strategy development	This includes a requirement to undertake scoping about the future of the area and the first formal public consultation on the plan. This consultation will focus on strategic options for growth and issues and opportunities for the Borough. It will also include evidence gathering and drafting the plan, including a Design Code for 'areas of change'. Engagement, proposing changes and submission of the plan – including a requirement for the second public consultation on the plan	Winter 2025/6 – Winter 2028 Months 1 - 23
Stage 2 – Submit the Plan to the Secretary of State	Council formally submits the Local Plan and associated documents to the Secretary of State for its examination in public.	Months 23 -25
Stage 3 – Examination of the plan	The independent examination in public on the Local Plan takes place.	Months 25 - 30
Stage 4 – Adoption of the Plan	Council formally adopts the Local Plan.	

The Indicative LDS was produced with reference to the Government's guidance and information, in place in February/ March 2025. It was predicated on the launch of the new planning system in autumn 2025. Given that this is now anticipated in early 2026, a new LDS (likely to be replaced by "Local Plan Timetable") will be prepared and published to coincide with this.

The latest (March 2025) indicative version of the LDS can be viewed online:

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

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 period. It should be noted that the Local Plan adopted March 2025 passed the examination process which included consideration of the Duty to Cooperate. The Local Plan Inspectors' Report (21 February 2025) can be viewed via the following link: [Local Plan 2021-2040 \(adopted March 2025\) | Local Plan 2021-2040 \(adopted March 2025\) | Borough Council of King's Lynn & West Norfolk](#).

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 year 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 ongoing preparation of the Norfolk Strategic Planning Framework (NSPF) which also performs the function of a 'statement of common ground' between the authorities.
- As part of the NSPF there is an officer group that reports to the Member Forum. The NSPF is a non-statutory document for the whole of Norfolk but represents a statement of common ground between the partner authorities, in accordance with the Duty to Cooperate. The document outlines a series of agreements between all of the authorities including, shared objectives on housing, employment and infrastructure. As of April 2025, the May 2021 NSPF²² had been endorsed by all the relevant authorities. In addition, preparation of an updated NSPF was commenced in 2024, with the updated version expected to be adopted by all parties, by autumn 2025. The latest version of the NSPF can be viewed via the following link: [Strategic planning policies | Strategic planning policies | Borough Council of King's Lynn & West Norfolk](#).
- 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 by the Borough Council in

²² <https://www.norfolk.gov.uk/nsf>

October 2024²³.

Cooperation Mechanisms:

- Ongoing engagement through the Norfolk Strategic Planning Framework
- Ongoing engagement through the Habitat Regulation Assessment and Mitigation and Green 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 significant matter in large parts of the Borough), flood defences, 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 emerging Local Plan.

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

²³ https://www.west-norfolk.gov.uk/info/20079/planning_policy_and_local_plan/1174/norfolk_planning_in_health_protocol_2024

District.

Natural England: Representations and advice on the emerging Local Plan, particularly in relation to designated nature conservation sites and issues (e.g. stone curlews), and Habitats Regulations Assessments. During the latter stages of the Local Plan examination (following the Main Modifications consultations, August/ September 2024), the Borough Council began a process of engagement with Natural England, with a consider developing an Air Quality Management Strategy, to ensure there will be no decrease in air quality which would have an adverse effect on the integrity of the Dersingham Bog SAC and Ramsar from traffic pollution.

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 up to 4,000 new homes 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 and most (e.g. NORA, Parkway) are nearing completion.

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.

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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 neighbourhood 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 2025):

Neighbourhood Plan	Date Made
Brancaster	January 2021 (review)
Castle Acre	February 2022
Burnham Market	September 2023
Gayton and Gayton Thorpe	November 2023
Grimston, Pott Row, Roydon and Congham	August 2024
Heacham	June 2022
Holme-next-the-Sea	July 2021 (Part C review "made" April 2023)
Hunstanton	June 2022
North Wootton	November 2024
Old Hunstanton	February 2024
Ringstead	February 2025
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 2025, a further 5 Neighbourhood Plans had reached an advanced stage of preparation; i.e. Regulation 14 and/ or imminent submission under Regulation 15. The following Neighbourhood Plans are anticipated to go to referendum during the 2024-2025 monitoring period:

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Neighbourhood Plan	Anticipated adoption date
Docking	Spring 2026
Marshland St James	Autumn 2025
Syderstone	Autumn 2025
The Walpoles	Autumn 2025
Walpole Cross Keys Neighbourhood Plan Review	Spring 2026

There are 39 parishes within the Borough that are designated Neighbourhood Areas. As of April 2025, 22 Neighbourhood Plans were “made”, covering 25 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:

	FY 2024/25	FY 2016/17 to FY 2024/25
CIL income (£)	£3,119,575.13	£9,884,847.91
CIL spent (£)	£1,914,440.28	£4,672,094.47
CIL (£) allocated for projects and not yet implemented	£1,929,450.60	£2,922,220.89
Number of projects money has been spent on	52	155
Number of projects money has been allocated to	65	259

The income, expenditure, and allocations include Parish Council, Strategic Allocations and expenditure, and do not include admin costs. The number of projects where money has been spent and allocated refers only to the funding projects approved by the Spending Panel and not include the Parish Councils' money.

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

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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.

CS/ SADMP Policy	Replace- ment Local Plan 2021- 2040 Policy	Policy name	Data/ information sought	Spatial element	Period	Likely source
Economy						
CS10	LP07	The Economy	Extant/ live planning permissions for major non-residential development (as of 31 March 2025)	Borough Wide	Up to (and including) 27/03/2025	Uniform report
DM11	LP09	Touring and Permanent Holiday Sites	No of planning permissions granted citing DM11	Coastal Change Management Area and National Landscape Area (formerly AONB)	01/04/2024-27/03/2025	GIS filter and Uniform report - No of consented touring/ permanent caravan sites
DM12	LP11	Strategic Road Network	No of planning permissions citing DM12/ along strategic routes	A10, A17, A47, A134, A148, A149, A1101, A1122, outside development boundaries	01/04/2024-27/03/2024	GIS filter and Uniform report
DM13	LP12	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;	01/04/2024-27/03/2025	GIS filter and Uniform report
Society						
DM14	LP10	Development associated with the National Construction	No of planning applications relating to CITB Bircham Newton or RAF Marham	CITB Bircham Newton or RAF Marham	01/04/2024-27/03/2025	Uniform report/ Public Access search

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CS/ SADMP Policy	Replace- ment Local Plan 2021- 2040 Policy	Policy name	Data/ information sought	Spatial element	Period	Likely source
		College, Bircham Newton and RAF Marham				
CS09	LP01	Housing Delivery Test	Housing Completions	Borough Wide	01/04/2020-31/03/2024	Uniform report
CS09	LP01	Housing Land Supply/ Trajectory	Extant/ live planning permissions (as of 31 March 2025)	Borough Wide	01/04/2025-31/03/2040	Uniform report
CS09	LP01	No of dwellings completed on PDL	Housing Completions on previously developed (brownfield) land	Borough Wide	01/04/2024-31/03/2025	Uniform report
CS09	LP28	Affordable Housing Delivery	No of affordable units completed	Borough-wide	01/04/2020-31/03/2024	Strategic Housing
CS09	LP32	Gypsy and Traveller Pitches	No of pitches approved	Borough-wide	01/04/2024-31/03?2025	Strategic Housing
n/a	LP31	Custom and Self-Build Housing	No of Custom and Self-Build (CSB) plots granted planning permission, against register	Borough Wide	31/10/2023-30/10/2024	Planning Policy
DM2	LP02	Development Boundaries	No of planning permissions granted outside SADMP development boundaries	Rural areas (as defined by development boundaries) - excluding SVH parishes	01/04/2024-27/03/2025	GIS filter and Uniform report
DM3	n/a	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 Creak;e;	01/04/2024-27/03/2025	GIS filter and Uniform report/ housing trajectory

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CS/ SADMP Policy	Replace- ment Local Plan 2021- 2040 Policy	Policy name	Data/ information sought	Spatial element	Period	Likely source
				North Runcton; Pentney; Ringstead; Roydon; Ryston; Downham West; Shernborne; Shouldham Thorpe; South Creak; Stow Bardolph; Stanhoe; Titchwell; Tottenhill; West Acre; West Dereham; West Rudham; Wretton		
DM4	LP34	Houses in Multiple Occupation	No of planning permissions for C4 use class or making specific reference to HMOs	Borough-wide	01/04/2024- 27/03/2025	Uniform report
DM5	LP35	Enlargement or Replacement of Dwellings in the Countryside	No of planning permissions for replacement dwellings	Rural areas (as defined by development boundaries)	01/04/2024- 27/03/2025	Housing trajectories
DM6	LP36	Housing needs of rural workers	No of planning permissions citing Policy DM6	Rural areas (as defined by development boundaries)	01/04/2024- 27/03/2025	Uniform report/ Planning Committee reports
DM7	LP37	Residential Annexes	No of planning permissions citing Policy DM7	Borough-wide	01/04/2024- 27/03/2025	Uniform report
DM9	LP38-LP39	Community Facilities	No of community facilities explicitly referenced through Neighbourhood Plans	Parishes with "made" Neighbourhood Plans	29/09/2016- 31/03/2025	
Environment						
n/a	LP21	Air Quality	Latest published NO2 data	Borough Wide (focused upon AQMA's)		Air Quality Action Plan
DM21	LP25	Flooding and water quality	No of planning permissions granted, contrary to EA advice	Borough-wide	01/04/2024- 27/03/2025	Uniform report/ committee reports/ written updates (e.g. re Nutrient

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CS/ SADMP Policy	Replace- ment Local Plan 2021- 2040 Policy	Policy name	Data/ information sought	Spatial element	Period	Likely source
						Neutrality, water scarcity)
CS12	LP20	Conservation of the Built Environment	No of designated Conservation Areas; Listed Buildings; Scheduled Monuments; Historic Parks; Ancient Woodlands	Borough-wide	As of 27/03/2025	Principal Conservation Officer
n/a	LP27	GI-RAMS	Income through GI-RAMS tariff	Borough-wide	01/04/2024-31/03/2025	Office Manager
CS08/ DM10	LP24	Renewable Energy	Details of planning permission for renewable energy projects	Borough-wide	01/04/2024-27/03/2025	Uniform report/ committee reports
DM16	LP05/ LP39	Provision of Recreational Open Space for Residential Developments	No of planning permissions granted, citing DM16	Borough-wide	01/04/2024-27/03/2025	Uniform Reports/ S106 agreements
DM18	LP17	Coastal Risk Hazard Zone (Hunstanton to Dersingham)	No of planning permissions for new dwellings (including replacement dwellings) or changes to occupancy conditions	Coastal Change Management Area	01/04/2024-27/03/2025	GIS filter and Uniform report - No planning permissions granted within CCMA
DM22	LP26	Protection of Local Open Space	No of planning permissions granted citing DM22/ No of designated Local Green Spaces (Neighbourhood Plans)	Borough-wide	01/04/2024-27/03/2025	Uniform Reports/ S106 agreements

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