

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



Cabinet

Agenda

Monday, 15th January, 2024
at 6.00 pm

in the

Council Chamber
Town Hall
Saturday Market Place
King's Lynn

Also available to view on Zoom and available for the public to view on [WestNorfolkBC on You Tube](#)



King's Court, Chapel Street, King's Lynn, Norfolk, PE30 1EX
Telephone: 01553 616200

CABINET AGENDA

DATE: CABINET - MONDAY, 15TH JANUARY, 2024

**VENUE: COUNCIL CHAMBER, TOWN HALL, SATURDAY
MARKET PLACE, KING'S LYNN PE30 5DQ**

TIME: 6.00 pm

As required by Regulations 5 (4) and (5) of The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 - Item 20 (appendix to item 19) below will be considered in private.

Should you wish to make any representations in relation to the meeting being held in private for the consideration of the above item, you should contact Democratic Services

1. MINUTES

To approve the Minutes of the Meeting held on 5 December 2023 (previously circulated).

2. APOLOGIES

To receive apologies for absence.

3. URGENT BUSINESS

To consider any business, which by reason of special circumstances, the Chair proposes to accept, under Section 100(b)(4)(b) of the Local Government Act 1972.

4. DECLARATIONS OF INTEREST (Page 6)

Please indicate if there are any interests which should be declared. A declaration of an interest should indicate the nature of the interest (if not already declared on the Register of Interests) and the agenda item to which it relates. If a disclosable pecuniary interest is declared, the member should

withdraw from the room whilst the matter is discussed.

These declarations apply to all Members present, whether the Member is part of the meeting, attending to speak as a local Member on an item or simply observing the meeting from the public seating area.

5. CHAIR'S CORRESPONDENCE

To receive any Chair's correspondence.

6. MEMBERS PRESENT UNDER STANDING ORDER 34

To note the names of any Councillors who wish to address the meeting under Standing Order 34.

Members wishing to speak pursuant to Standing Order 34 should inform the Chair of their intention to do so and on what items they wish to be heard before a decision on that item is taken.

7. CALLED IN MATTERS

To report on any Cabinet Decisions called in.

8. FORWARD DECISIONS (Pages 7 - 11)

A copy of the Forward Decisions List is attached

9. MATTERS REFERRED TO CABINET FROM OTHER BODIES

To receive any comments and recommendations from other Council bodies which meet after the dispatch of this agenda.

10. POLLING DISTRICT REVIEW (Pages 12 - 43)

11. COUNCIL TAX PREMIUMS FOR LONG-TERM EMPTY PROPERTIES AND SECOND HOMES (Pages 44 - 61)

12. WHISTLE BLOWING POLICY (Pages 62 - 86)

13. DESIGNATION OF A VILLAGE GREEN - SOUTH LYNN (Pages 87 - 104)

14. HOUSING OPTIONS OFFICER POST (Pages 105 - 112)

15. APPOINTMENT OF HONORARY ALDERMEN (Pages 113 - 117)

16. LOCAL PLAN GYPSY AND TRAVELLER SITES CONSULTATION DOCUMENT (Pages 118 - 236)

17. **WEST NORFOLK SHARED PROSPERITY FUNDING AND RURAL ENGLAND PROSPERITY FUNDING: PROGRAMME UPDATE AND 2024/25 PRIORITIES** (Pages 237 - 266)
18. **COUNCIL COMPANIES FUNDING** (Pages 267 - 288)
19. **EXCLUSION OF THE PRESS AND PUBLIC**

The Cabinet is asked to consider excluding the public from the meeting under section 100A of the Local Government Act 1972 for consideration of the items below on the grounds that they involve the likely disclosure of exempt information as defined by paragraphs 3 and 5 of Part 1 of Schedule 12A to the Act, and that the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

PRIVATE ITEM

Details of any representations received about why the following reports should be considered in public will be reported at the meeting.

20. **COUNCIL COMPANIES FUNDING - EXEMPT APPENDIX** (Pages 289 - 462)

To: Members of the Cabinet

Councillors B Anota, A Beales, M de Whalley, J Moriarty (Vice-Chair),
C Morley, T Parish (Chair), S Ring, J Rust and S Squire

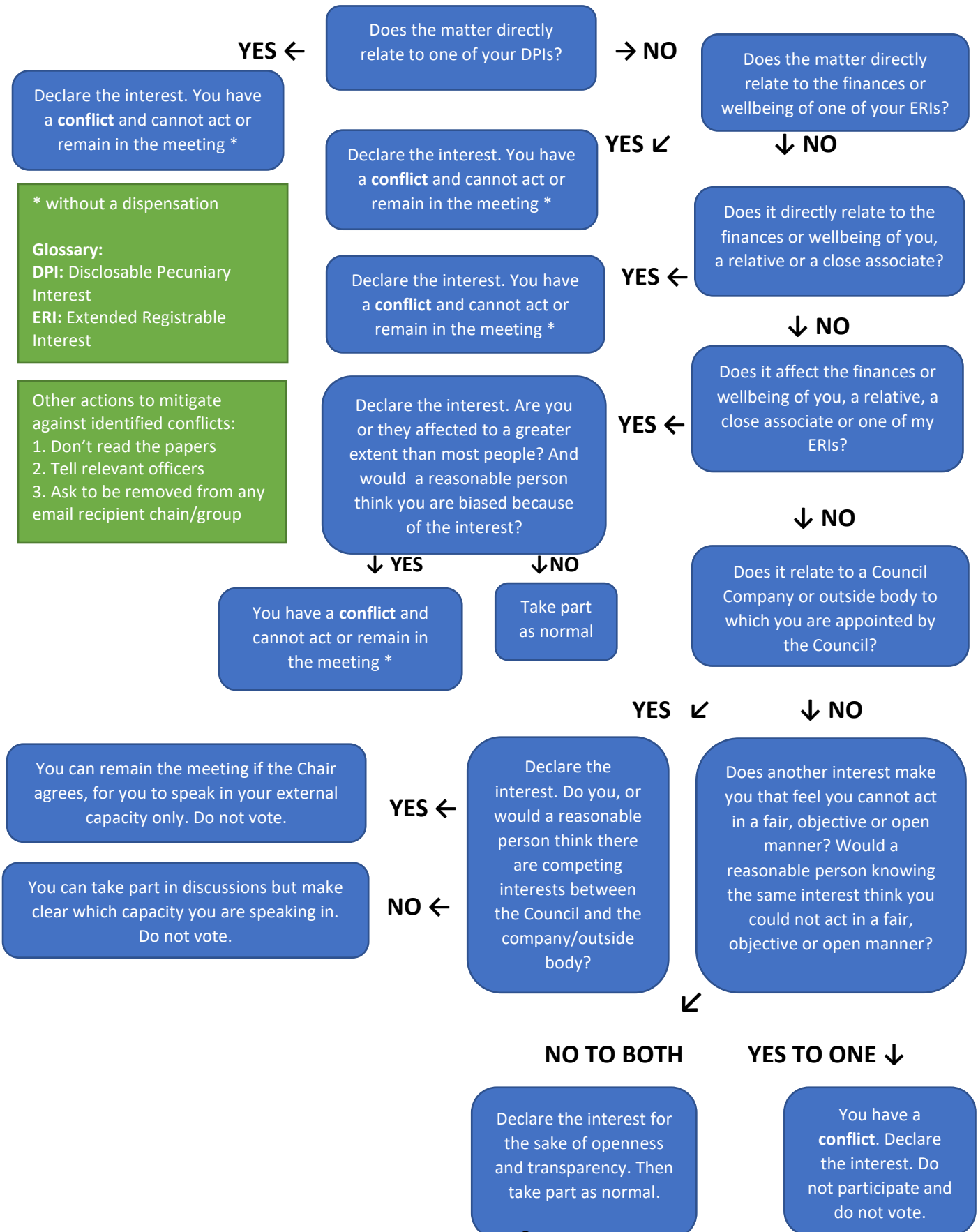
For Further information, please contact:

Sam Winter, Democratic Services Manager 01553 616327
Borough Council of King's Lynn & West Norfolk
King's Court, Chapel Street
King's Lynn PE30 1EX

DECLARING AN INTEREST AND MANAGING ANY CONFLICTS FLOWCHART



START



FORWARD DECISIONS LIST

Date of meeting	Report title	Key or Non Key Decision	Decision Maker	Cabinet Member and Lead Officer	List of Background Papers	Public or Private Meeting
15 January 2024						
	West Norfolk Shared Prosperity Funding update	Key	Cabinet	Business Asst Director – D Hall		Public
	Polling District Review	Key	Council	Leader Chief Executive		Public
	Council Tax for Second Homes	Key	Council	Leader Exec Dir – Finance		Public
	Appointment of Honorary Aldermen	Non	Council	Chief Executive Leader		Public
	Housing Options Officer post	Non	Cabinet	People and Communities Asst Dir D Hall		Public
	Whistleblowing Policy	Non	Council	Leader Assistant Director – A Baker		Public
	Local Plan Gypsy & Traveller Preferred Sites Consultation Document	Key	Cabinet	Development and Regeneration Asst Dir S Ashworth		Public
	Council Companies Funding	Key	Council	Business Assistant Dir D Ousby		Part public and part Private - Contains exempt Information under para 3 – information relating to the business affairs of any person (including the authority)
	Designation of Village Green – South Lynn	Non	Cabinet	Property and Corporate Services – or Development and Regeneration?		Public

				Exec Director		
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Date of meeting	Report title	Key or Non Key Decision	Decision Maker	Cabinet Member and Lead Officer	List of Background Papers	Public or Private Meeting
6 February 2024						
	Empty Homes Strategy Review	Key	Council	People and Communities Asst Dir M Whitmore		Public
	King's Lynn Town Football Club	Non	Cabinet	Property Asst Dir – M Henry		Private- Contains exempt Information under para 3 – information relating to the business affairs of any person (including the authority)
∞	Florence Fields – Tenure Mix	Non	Council	Deputy Leader Assistant Director – D Ousby		Part Public and part Private- Contains exempt Information under para 3 – information relating to the business affairs of any person (including the authority)
	Lynnsport One	Key	Council	Regeneration & Development Asst Dir Companies & Housing Delivery – D Ousby		Public
	Acquisition of Homes	Non	Cabinet	Regeneration and Development Assistant Director – D Hall		Part Public and part Private- Contains exempt Information under para 3 – information

						relating to the business affairs of any person (including the authority)
	Indemnity for Councillors and Officers on outside bodies	Non	Cabinet	Leader Monitoring Officer		Public
	Anti-Fraud & Anti-Corruption Policy	Non	Cabinet	Finance Asst Director – M Drewery		Public

Date of meeting	Report title	Key or Non Key Decision	Decision Maker	Cabinet Member and Lead Officer	List of Background Papers	Public or Private Meeting
7 February 2024 (Budget related items only)						
	Capital Programme	Key	Council	Finance Asst Director – Resources		Public
	Budget 2024/25	Key	Council	Finance Asst Director – Resources		Public
	Treasury Management Strategy/ Investment Strategy	Key	Council	Finance Asst Director – Resources		Public

Date of meeting	Report title	Key or Non Key Decision	Decision Maker	Cabinet Member and Lead Officer	List of Background Papers	Public or Private Meeting
5 March 2024						
	Review of Outside Bodies	Non	Cabinet and Council	Leader		Public

	Peer Review Challenge Action Plan	Non	Council	Leader Chief Executive		Public
	Data Protection Policy Review	Non	Council	Leader Monitoring Officer		Public
	Article 4 Direction	Non	Cabinet	Regeneration and Development Assistant Director – S Ashworth		Public
	KLACC – Area Committee Status	Non	Council	Leader Monitoring Officer		Public
	Redundancy Policy	Non	Council	Leader Exec Dir – D Gates		Public

Date of meeting	Report title	Key or Non Key Decision	Decision Maker	Cabinet Member and Lead Officer	List of Background Papers	Public or Private Meeting
11 April 2024 Special Meeting						
10	Local Plan Gypsy and Traveller Preferred Sites	Key	Council	Development and Regeneration Asst Dir S Ashworth	Local Plan Task Group mins and Agendas	Public

Date of meeting	Report title	Key or Non Key Decision	Decision Maker	Cabinet Member and Lead Officer	List of Background Papers	Public or Private Meeting
23 April 2024						

Date of meeting	Report title	Key or Non Key Decision	Decision Maker	Cabinet Member and Lead Officer	List of Background Papers	Public or Private Meeting
11 June 2024						

	St George's Guildhall RIBA Stage 3 and project scope	Key	Cabinet	Regeneration & Development Asst Dir		Public
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Items to be scheduled

	Notice of Motion 7-21 – Councillor Kemp – Equalities	Non	Council	People & Communities Asst Dir B Box		Public
	Procurement Strategy	Non	Cabinet	Finance Asst Dir – D Ousby		Public
	Review of Planning Scheme of Delegation (summer 23)	Non	Council	Development and Regeneration Asst Dir – S Ashworth		Public
	Custom and Self Build Site – Stoke Ferry	Non	Cabinet	Regeneration and Development Assistant Director - D Hall		Public
	Southend Road Hunstanton	Key	Cabinet	Regeneration & Development Asst Dir – D Ousby		Public
→	Overnight Campervan parking in Hunstanton	Non	Cabinet	Leader Asst Director – M Chisholm		Public
	Pay Award 2024	Key	Cabinet	Leader		Public

REPORT TO CABINET

Open		Would any decisions proposed :			
Any especially affected Wards	Mandatory	Be entirely within Cabinet's powers to decide		NO	
		Need to be recommendations to Council		YES	
		Is it a Key Decision		YES	
Lead Member: Cllr Terry Parish E-mail: cllr.terry.parish@west-norfolk.gov.uk		Other Cabinet Members consulted:			
		Other Members consulted:			
Lead Officer: Lorraine Gore E-mail: lorraine.gore@west-norfolk.gov.uk Direct Dial: 01553 616245		Other Officers consulted:			
Financial Implications	Policy/ Personnel Implications	Statutory Implications	Equal Impact Assessment	Risk Management Implications	Environmental Considerations
NO	NO	NO	NO	NO	NO

Date of meeting: 15 January 2024

POLLING DISTRICT & POLLING PLACE REVIEW

<p>Summary</p> <p>This report presents to Council a revised Polling District and Polling Place Review Schedule.</p> <p>Recommendation</p> <p><u>Recommendations to Full Council:</u></p> <p>The attached (APPENDIX) Polling District and Polling Place Review Schedule is adopted.</p> <p>Due to size of the document – this only includes polling districts where either public comments were received or where any changes were recommended by the ARO (Acting Returning Officer). All remaining Polling Districts will remain unchanged.</p> <p>Reason for Decision</p> <p>To ensure that the Council meets its statutory obligations. (A Polling District Review has to be carried out once every five years).</p>

1 Background

Members will be aware of the Council's duty to undertake a review of the polling districts and polling places in respect of Parliamentary electoral areas that fall within the boundaries of the Borough. This review must take place every five years and was last conducted in It is the (ARO) Acting Returning Officer's responsibility to keep polling stations under review.

The previous Review took place in October/November 2018.

Views have been sought from all stakeholders including County Councillors, Borough Councillors, and political groups. In addition, Parish Councils have been consulted together with local disability groups.

2 Options Considered

Representations closed on 24 November 2023 and were published accordingly (on the BCKLWN website). The ARO has made further comments to the representations received.

See attached Appendix for document which contains all polling districts where either public comments were received or where any changes were recommended by the ARO.

The table highlights any proposed changes (only):

Polling District (area)	Proposed change
PD2 (Fairstead)	To be re-integrated into the wider PD1 (Fairstead) polling district.
PJ4 (St Margaret's with St Nicholas)	To be re-integrated into the wider PJ1 (St Margaret's with St Nicholas) polling district
WT7 (Denver)	To be re-integrated into the wider WM1 (Denver) polling district

3 Policy Implications

NONE

4 Financial Implications

NONE

5 Personnel Implications

NONE

6 Environmental Considerations

NONE

7 Statutory Considerations

Publishing the Polling District and Polling Place Review Schedule is a statutory requirement.

8 Equality Impact Assessment (EIA)

(Pre screening report template attached)

9 Risk Management Implications

The Council's risk management system is integrated with the Polling District and Polling Place Review, so the risks associated are identified and linked.

10 Declarations of Interest / Dispensations Granted

NONE

11 Background Papers

NONE

Pre-Screening Equality Impact Assessment

Borough Council of
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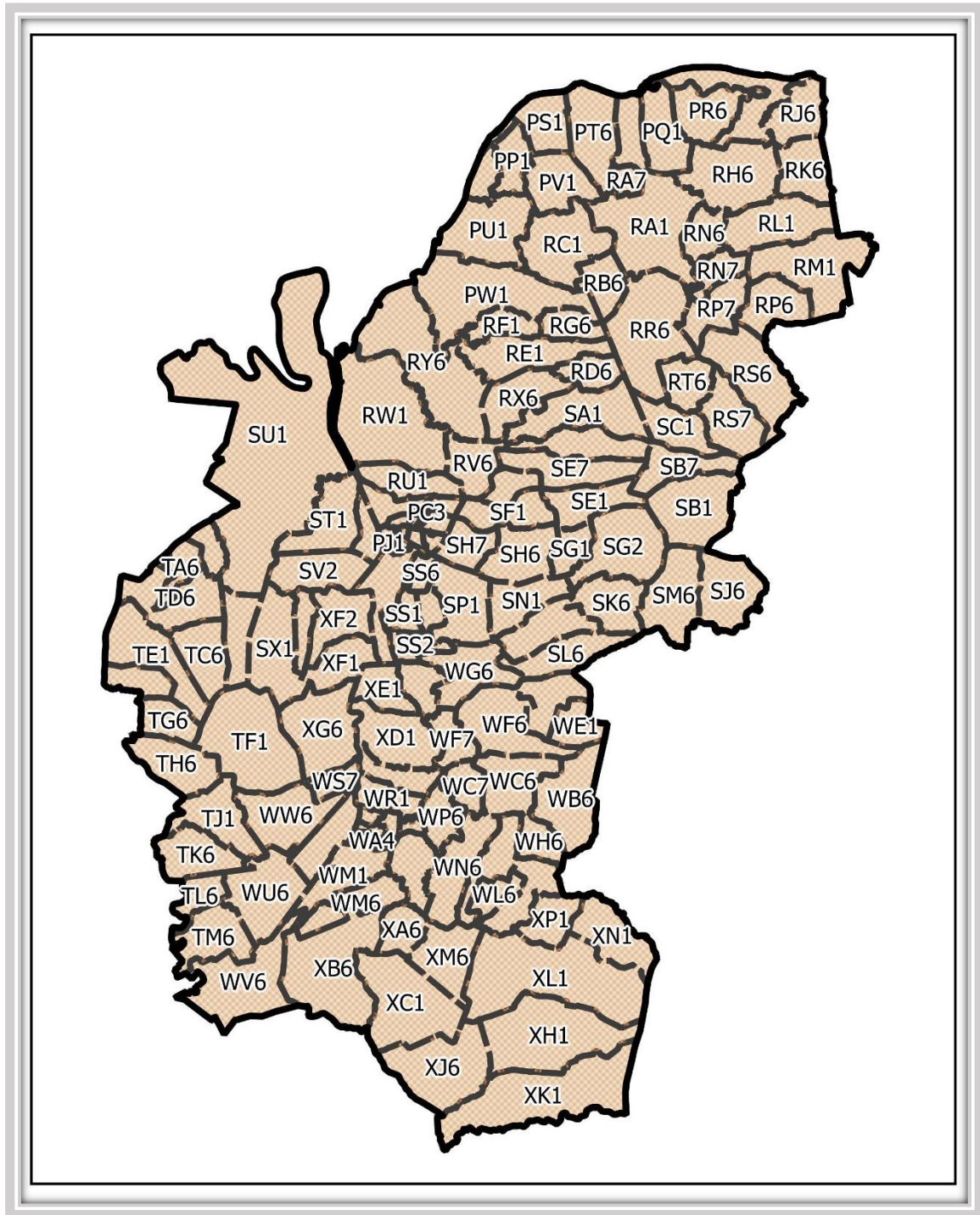


Name of policy/service/function	Electoral Services				
Is this a new or existing policy/service/function?	Existing				
<p>Brief summary/description of the main aims of the policy/service/function being screened.</p> <p>Please state if this policy/service is rigidly constrained by statutory obligations</p>	<p>Review of existing polling districts and polling places – which is a statutory requirement every 5 years.</p>				
Question	Answer				
<p>1. Is there any reason to believe that the policy/service/function could have a specific impact on people from one or more of the following groups according to their different protected characteristic, for example, because they have particular needs, experiences, issues or priorities or in terms of ability to access the service?</p> <p>Please tick the relevant box for each group.</p> <p>NB. Equality neutral means no negative impact on any group.</p>		Positive	Negative	Neutral	Unsure
	Age			X	
	Disability			X	
	Gender			X	
	Gender Re-assignment			X	
	Marriage/civil partnership			X	
	Pregnancy & maternity			X	
	Race			X	
	Religion or belief			X	
	Sexual orientation			X	
	Other (eg low income)			X	

Borough Council of King's Lynn & West Norfolk

Review Of Polling Districts, Polling Places & Polling Stations 2023

Maps, Information, Proposals, Consultee Comments and Recommendations



Contents:

Page 3:	Key Information and Definitions
Page 4:	PC2 – Gaywood North Bank
Page 6:	PD1 – Fairstead
Page 8:	PD2 – Fairstead
Page 10:	PJ1 – St. Margaret’s with St. Nicholas
Page 12:	PJ4 – St. Margaret’s with St. Nicholas
Page 14:	RH6 – Burnham Market
Page 16:	RW1 – North Wootton
Page 18:	SJ6 – Castle Acre
Page 20:	TL6 – Upwell
Page 22:	TM6 – Upwell
Page 24:	WM1 – Denver
Page 26:	WT7 – Denver

Reason for review:

Under the Representation of the People Act 1983, the Council has a duty to divide the Borough into polling districts and to designate a polling place for each district. It also has to keep these arrangements under review.

Section 16 of the Electoral Administration Act 2006 introduced a number of changes to the 1983 Act in respect of the way reviews must be undertaken, including that a review must be conducted every four years from 31st December 2007. This does not prevent changes being made in-between full reviews.

The arrangements made for parliamentary elections are also used at other elections.

Local authorities must also comply with accessibility requirements and consider the accessibility of polling stations as part of the review.

Suitable facilities for the staff working at the polling stations should also be considered.

Definitions:

- **Polling District:** the area created by the division of a constituency, division or ward into smaller parts, within which a polling place can be determined which is convenient to the electors – Responsibility of the Council to designate.
- **Polling Place:** the area in which polling stations will be selected by the Returning Officer – Responsibility of the Council to designate.
- **Polling Station:** the room or building within polling place where the poll takes place – Responsibility of the Returning Officer to designate.
- **Electorate:** total number of registered electors per polling district as of 1st September 2023.

Polling District Boundaries:

** Please note that the boundaries for the Polling Districts have been created to be aligned with either existing:

- **Parliamentary boundaries**
- **Borough Ward boundaries**
- **County Council Division boundaries**
- **Parish Council boundaries.**

These boundaries cannot be altered under a 'Polling District Review'.

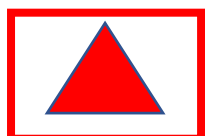
To view maps of these boundaries, please visit the '**Ordnance Survey – Election Maps**' website:

www.ordnancesurvey.co.uk/election-maps/gb/

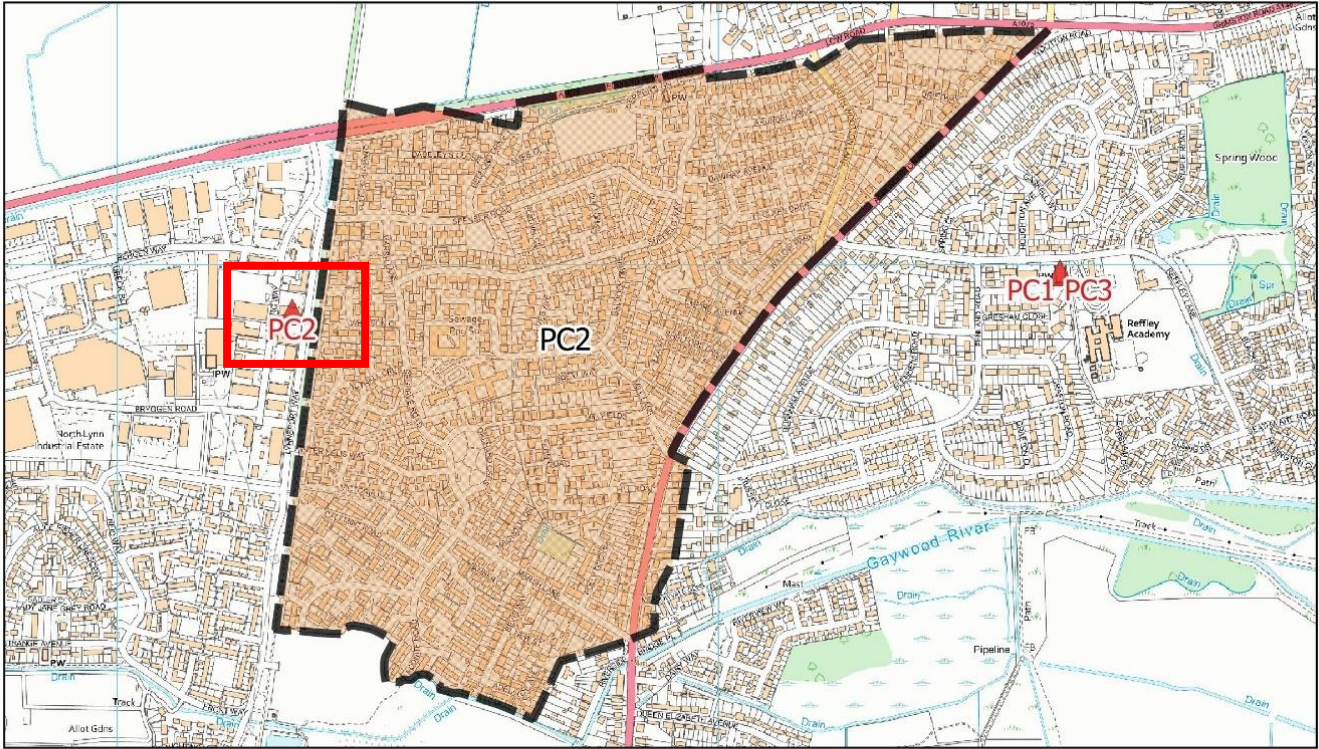
Map Key:

----- : Polling District Boundary

_____ : King's Lynn & West Norfolk Borough Council (Local Authority) Boundary



: Relevant Polling Station location, usually including alpha-numerical annotation



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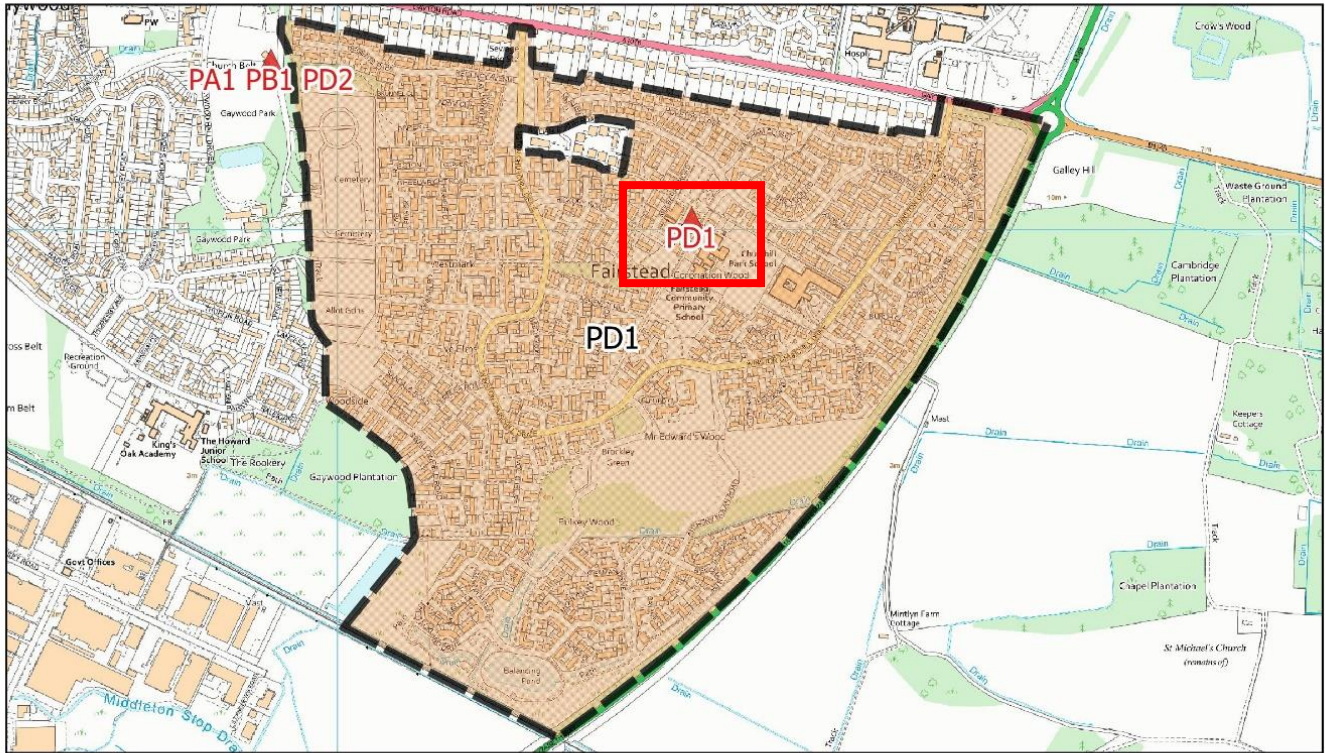
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31/08/2023**

Polling District:	PC2 - Gaywood North Bank (Gaywood North Bank Borough Ward)
Area of Polling Place:	Area of PC2 Polling District comprising the streets of Adelaide Avenue, Amber Court, Arundel Drive, Baldock Drive, Bedford Drive, Bevis Way, Braeburn Close, Brett Way, Camfrey, Chapel Terrace, Charlock, Clifford Burman Close, Clifton Road, Crofters Close, Daseleys Close, Dawnay Avenue, Empire Avenue, Evelyn Way, Fern Road, Festival Close, Ffolkes Drive, Folly Court, Folly Grove, Galyon Road, Grey Sedge, Hall Road, Hill Road, James Close, Kingcup, Lea Way, Low Road, Magnolia Drive, Marsh Lane, Mill Lane, Millfields, Monkshood, Morello Court, New Street, Nuthall Crescent, Orchard Crescent, Penrose Close, Peppers Green, Reeves Avenue, Samphire, Segrave Road, Shelford Drive, Somersby Close, South Wootton Lane, Spenser Road, Spring Sedge, Suffield Way, Tamarisk, Tawny Sedge, Victoria Close, Waterden Close, Westhorpe Close, White Sedge, Willow Park, Winter Nelis Way, Wootton Road (176-218, 211-363) and any new developments in the area bounded by those streets
Polling Station:	King's Lynn Masonic Centre, 9 Hamburg Way, North Lynn Industrial Estate, KING'S LYNN, PE30 2 ND <i>Note: Dual polling station</i>
Electorate:	2799
Proposed Changes:	None

<p>Consultee Comments:</p>	<p>27th October 2023 – By Email. Respondent: Adrian Simpson.</p> <p><i>Good afternoon, Over the last few years, I have used the Kings Lynn Masonic Centre on Hamburg Way, Kings Lynn. It is a great venue for a polling station due to its location, easy parking (they have their own car park) and general size. Best regards Adrian Simpson</i></p> <p>27th October 2023 – By Email. Respondent: Jim Gill.</p> <p><i>I find the Masonic Centre at Kings Lynn convenient with ample car parking space. Regards, Jim Gill.</i></p>
<p>Returning Officer Comments:</p>	<p>No alterations to existing polling district arrangements requested</p>
<p>Recommendation:</p>	<p>No alterations to existing polling district</p>



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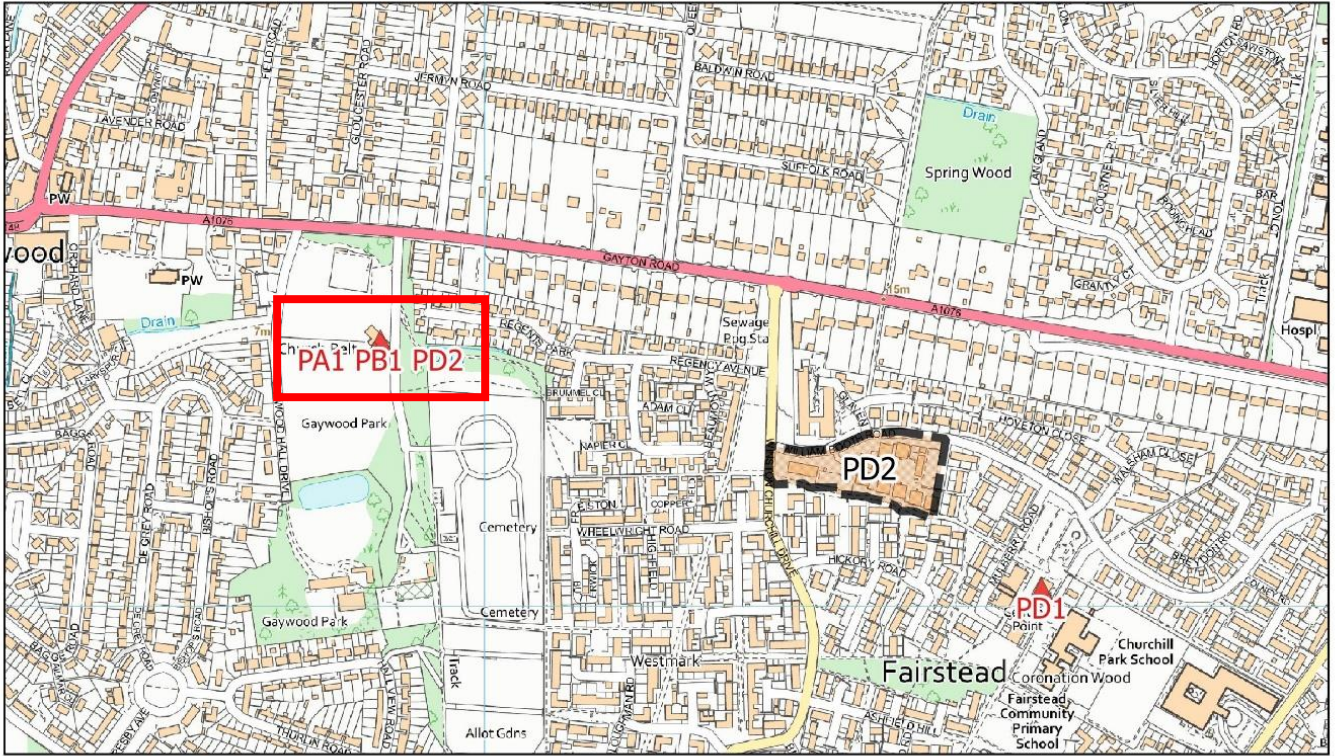
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31/08/2023

Polling District:	PD1 – Fairstead (Fairstead Borough Ward)
Area of Polling Place:	That part of King’s Lynn bounded by, but not including Queen Elizabeth Way until it meets the railway line to Leziate. Proceed in a north westerly direction until the junction with the drain and then north easterly until Pulkey Wood. Then bear west along Plantation Way path. Continue due north along the west side of Gayton Road cemetery, until reaching Gayton Road. Travel east along the rear boundary of properties on Gayton Road, until the junction with Winston Churchill Drive. Continue along Gayton Road back to Queen Elizabeth Way, excluding Minster Court
Polling Station:	Fairstead Community Centre, Centre Point, KING’S LYNN, PE30 4SR <i>Note: Dual polling station</i>
Electorate:	4186
Proposed Changes:	Re-integration of Polling District PD2 – Fairstead within PD1- Fairstead. This will see one further street, Minster Court, added to PD1. Please see page 12 for further information. Represents improvement to elector convenience and elimination of electoral administrative anomaly. PTO

Consultee Comments:	None
Returning Officer Comments:	Support proposals
Recommendation	Proceed with proposal of re-integration of Polling District PD2 – Fairstead within PD1- Fairstead



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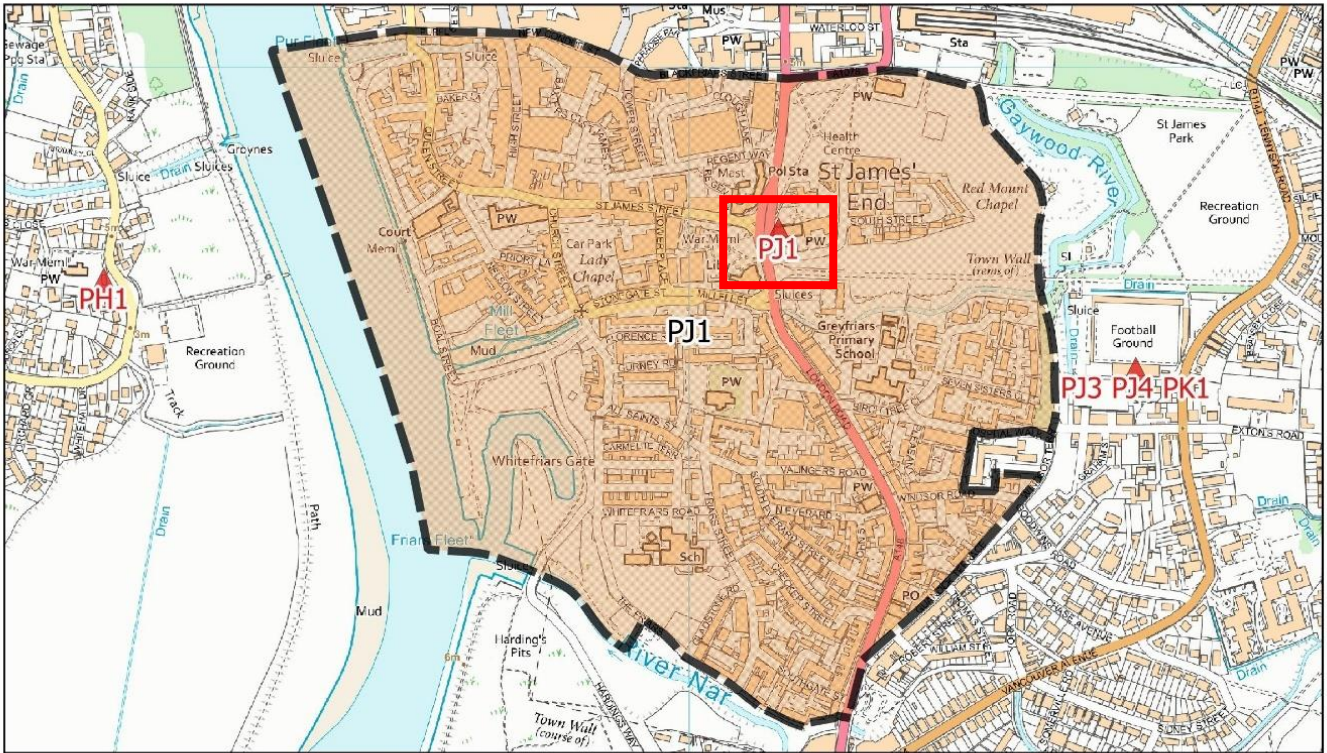


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Polling District:	PD2 – Fairstead (Fairstead Borough Ward)
Area of Polling Place:	The Minster Court part of Fairstead
Polling Station:	Gaywood Community Centre, Gayton Road, KING'S LYNN, PE30 4EE <i>Note: Dual polling station</i>
Electorate:	82
Proposed Changes:	Abolition of polling district PD2-Fairstead and integration into polling district to PD1-Fairstead. PD2-Fairstead was created solely to allow residents of Minster Court to vote at their location when Minster Court was previously used as a polling station for Springwood polling districts. As Springwood electors now use Gaywood Community Centre as their polling station, Minster Court voters can now be reintegrated into wider PD1-Fairstead district and vote at the Fairstead Community Centre. The Fairstead Community Centre is geographically closer to Minster Court than Gaywood Community Centre for voter convenience. Such a change also eliminates unnecessary electoral administration at election times.

PTO

Consultee Comments:	None
Returning Officer Comments:	Support proposals
Recommendation:	Proceed with proposal of re-integration of Polling District PD2 – Fairstead within PD1- Fairstead



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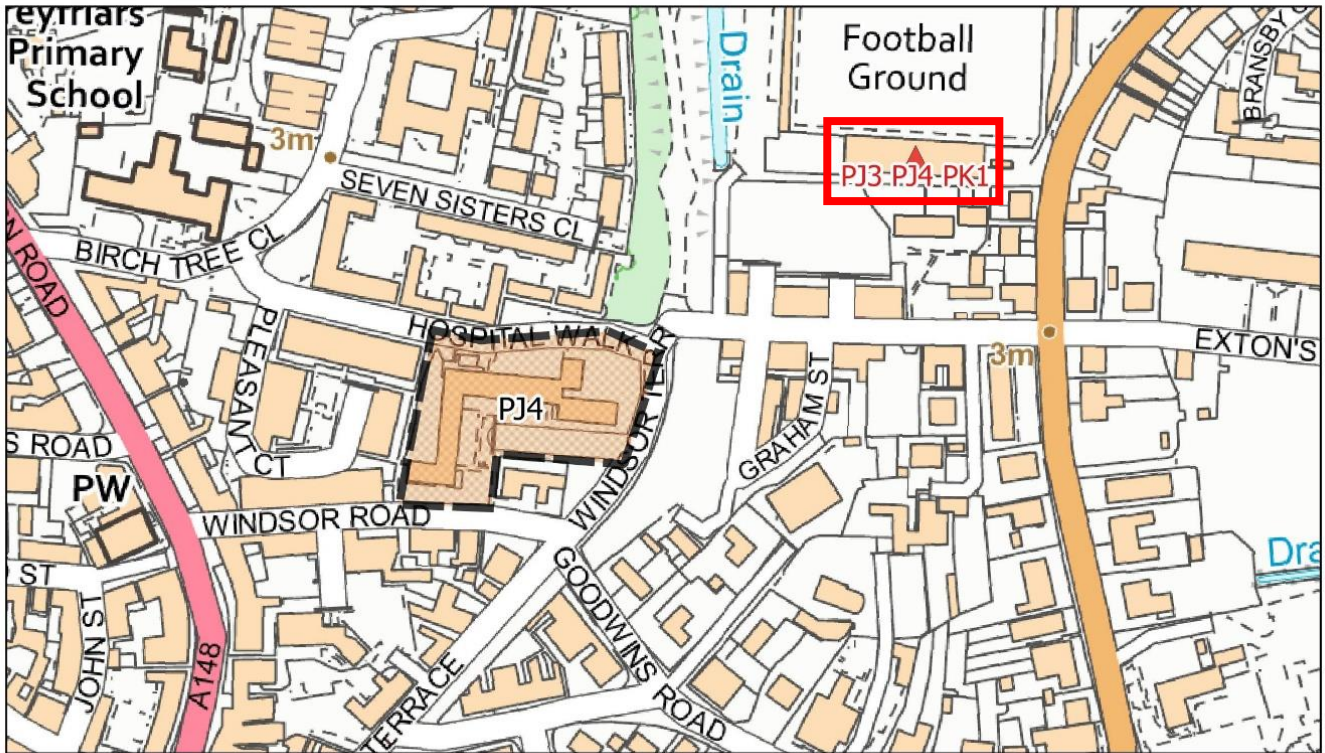
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Polling District:	PJ1 – St. Margaret’s with St. Nicholas (St. Margaret’s with St. Nicholas Borough Ward)
Area of Polling Place:	Area of PJ1 Polling District comprising the streets of All Saints Street, Baker Lane, Birch Tree Close, Bridge Street, Carmelite Terrace, Checker Street, Church Lane, Church Street, Clough Lane, Coronation Walk, County Court Road, Cromwell Terrace, Ethel Terrace, Fisheries Walk, Florence Road, Freestone Court, Friars Street, Friars Walk, Gladstone Road, Granary Court, Guanock Terrace (2-52, 49-51), Gurney Road, High Street, Hillington Square, Horsleys Court, John Street, King’s Staithe Lane, King’s Staithe Square, London Road, Lynwood Terrace, Millfleet, Nelson Street, North Everard Street, Old Brewery Court, Old Hospital Mews, Pleasant Court, Priory Lane, Providence Street, Purfleet Place, Queen Street, Regent Place, Regent Way, Saturday Market Place, Seven Sisters Close, South Everard Street, South Lynn Plain, South Quay, South Street, Southgate Street, St. James Court, St. James Street, St. Margaret’s Lane, St. Margaret’s Place, Stonegate Street, Terrace Lane, Tower Place, Tower Street, Union Lane, Valingers Road, Whitefriars Cottages, Whitefriars Road, Whitefriars Terrace, Windsor Park, Windsor Road and any new developments in the area bounded by those streets
Polling Station:	London Road Methodist Church, London Road, KING’S LYNN, PE30 5PU
Electorate:	2007
Proposed Changes:	Re-integration of Polling District PJ4 -St. Margarets with St. Nicholas back into PJ1- St. Margarets with St. Nicholas. This will see one street, Windsor Park, added to PJ1. This will eliminate an electoral administration anomaly. Please see page 20 for further information. PTO

Consultee Comments:	None
Retuning Officer Comments:	Support proposals
Recommendation:	Proceed with proposal of re-integration of Polling District PJ4 – St. Margaret’s with St. Nicholas within PJ1- St. Margaret’s with St. Nicholas



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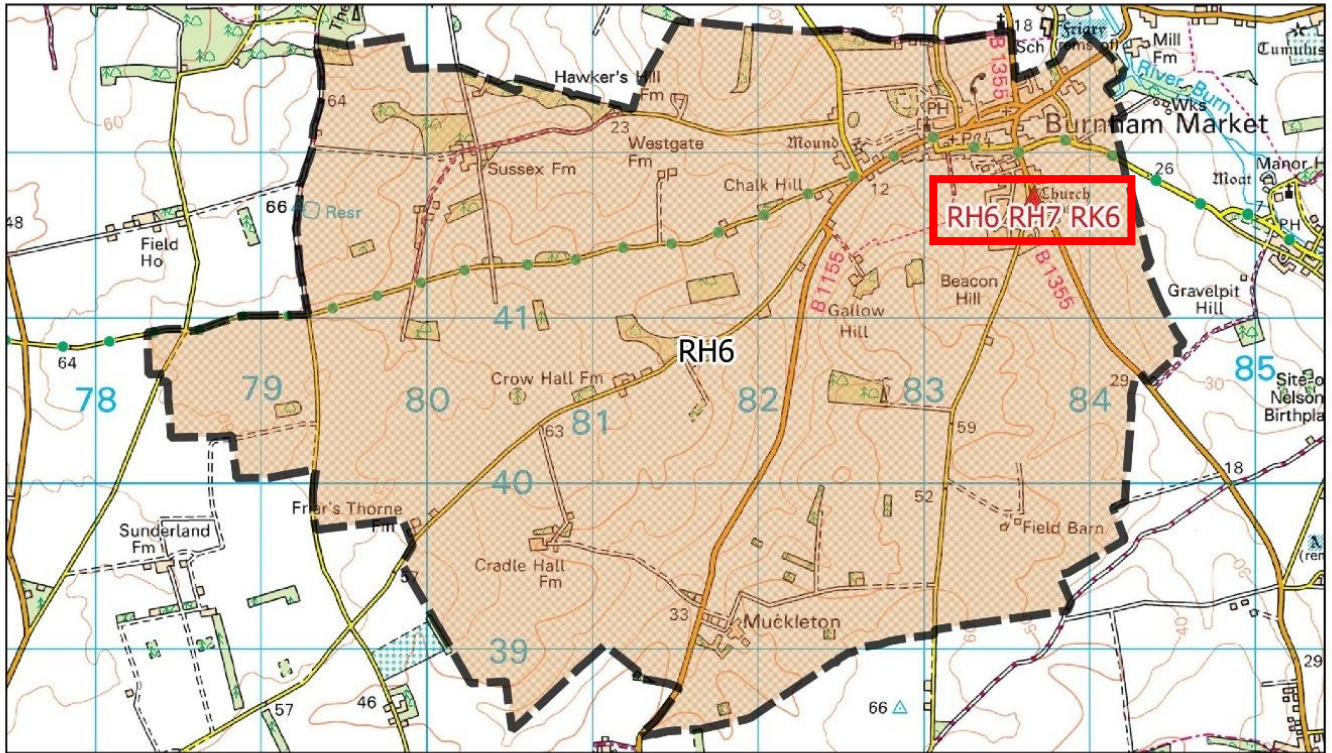
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 31/08/2023

Polling District:	PJ4 – St. Margaret’s with St. Nicholas (St. Margaret’s with St. Nicholas Borough Ward)
Area of Polling Place:	Windsor Park, KING’S LYNN, PE30 5PW
Polling Station:	King’s Lynn Town Football Club, The Walks, Tennyson Avenue, KING’S LYNN, PE30 5PB
Electorate:	39
Proposed Changes:	<p>Abolition of Polling District PJ4 - St. Margaret’s with St. Nicholas and integration into polling district to PJ1 - St. Margaret’s with St. Nicholas.</p> <p>PJ4 - St. Margaret’s with St. Nicholas was created solely to allow residents of Windsor Court to vote at their location when Windsor Court was previously used as a polling station for PK1-Gaywood Chase and PJ3-St. Margaret’s with St. Nicholas polling districts. As PK1 and PJ3 electors now use King’s Lynn Town Football Club as their polling station, Windsor Court voters can now be reintegrated into the wider PJ1- St. Margaret’s with St. Nicholas polling district and vote at London Road Methodist Church. London Road Methodist Church was previously the polling station for PJ4. While the London Road Methodist Church is slightly further away than the Football Club, it is not an inconvenient location given neighbouring properties to Windsor Park in PJ1 already use it. Such a change also eliminates unnecessary electoral administration at election times.</p>

Consultee Comments:	None
Retuning Officer Comments:	Support proposals
Recommendation:	Proceed with proposal of re-integration of Polling District PJ4 – St. Margaret’s with St. Nicholas within PJ1- St. Margaret’s with St. Nicholas.



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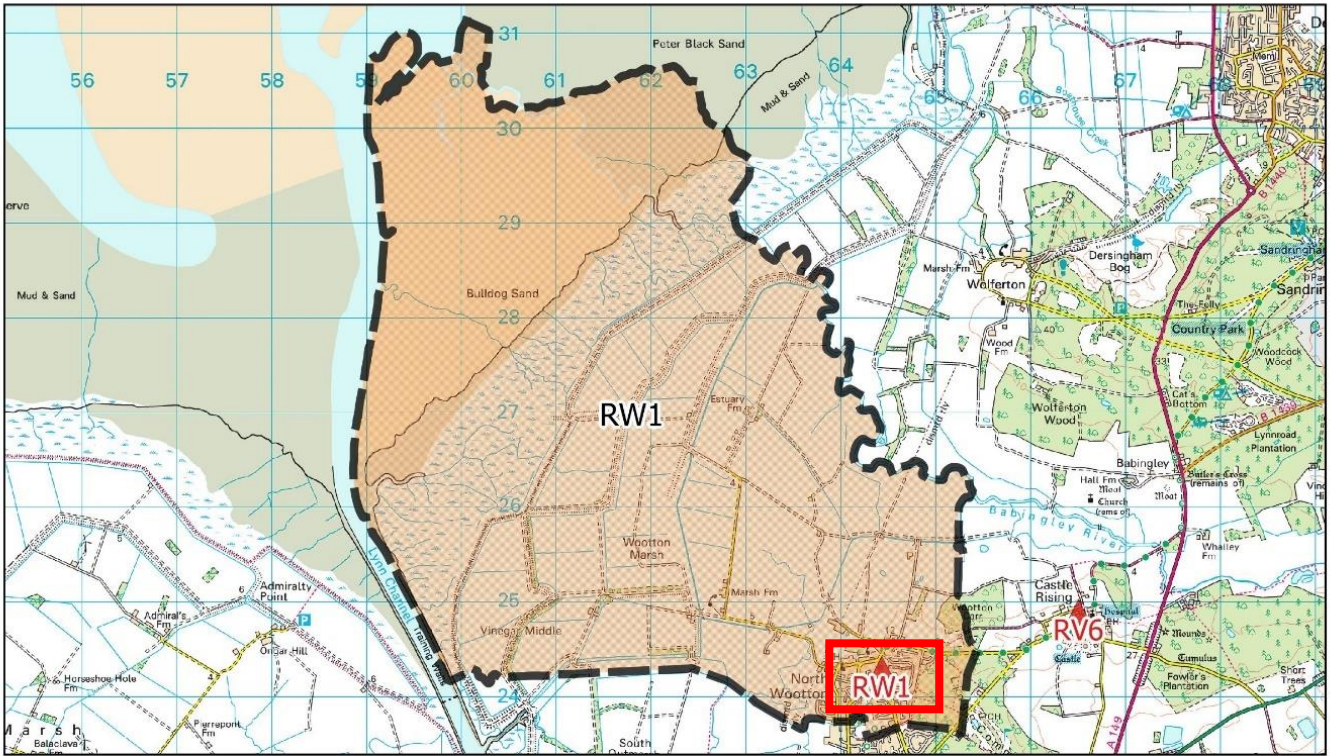
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Polling District:	RH6 – Burnham Market (Burnham Market & Docking Borough Ward)
Area of Polling Place:	The Parish of Burnham Market
Polling Station:	Burnham Market & Norton Village Hall, Beacon Hill Road, Burnham Market, KING'S LYNN, PE31 8ER
Electorate:	629
Proposed Changes:	None
Consultee Comments:	15 th November 2023 – By Email. Respondent: Caroline Boyden. <i>Good afternoon,</i>
	PTO

	<p><i>Burnham Market Parish Council are happy with the current polling arrangements but you would like to reduce the size of the Parish Council, due to reduced resident numbers and the fact that 50% of homes are either second homes or furnished holiday lets with no interest in the parish council. We would like to reduce the numbers of councillors from 11 to 7 asap.</i></p> <p><i>Best regards Caroline Boyden Parish Clerk Burnham Market Parish Council</i></p>
<p>Returning Officer Comments:</p>	<p>No alterations to existing polling district arrangements requested.</p> <p>The number of councillors sitting on a parish council falls outside the scope of a Polling District Review. Such matters are considered during a Community Governance Review. The borough council will be in contact with the Parish Council to discuss this matter separately.</p>
<p>Recommendation:</p>	<p>No alterations to existing polling district</p>



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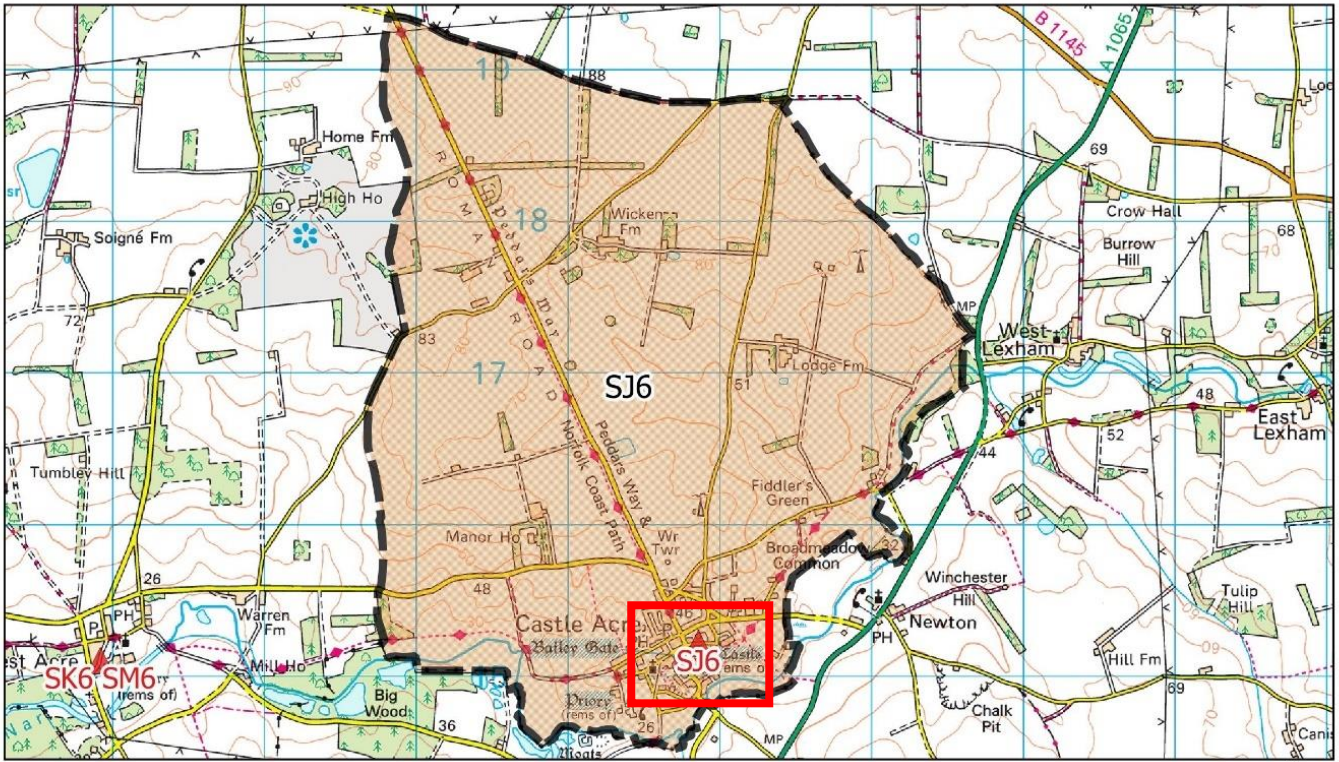
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31/08/2023

Polling District:	RW1 – North Wootton (The Woottons Borough Ward)
Area of Polling Place:	The Parish of North Wootton
Polling Station:	North Wootton Village Hall, 46 Priory Lane, North Wootton, KING'S LYNN, PE30 3PT
Electorate:	1876
Proposed Changes:	None
Consultee comments:	<p>27th October 2023 – By Email. Respondent: Lynne Gill</p> <p><i>Dear Sir/madam,</i> <i>My local polling station is at North Wootton Village Hall. It is easily accessible by foot for even elderly people , with just about sufficient car parking for those who drive in. If this facility were to be closed down, meaning people would have to travel further, it would be a hardship for many. It would also add to traffic on our roads and everything that implies.</i></p> <p style="text-align: right;">PTO</p>

	<p><i>One wonders why it is necessary to change the number and access of polling stations. One hopes fervently that there is not some political agenda behind it.</i></p> <p><i>Sincerely,</i></p> <p><i>Lynne Gill</i></p>
<p>Returning Officer Comments:</p>	<p>No alterations to existing arrangements requested</p>
<p>Recommendation:</p>	<p>No alterations to existing polling district</p>



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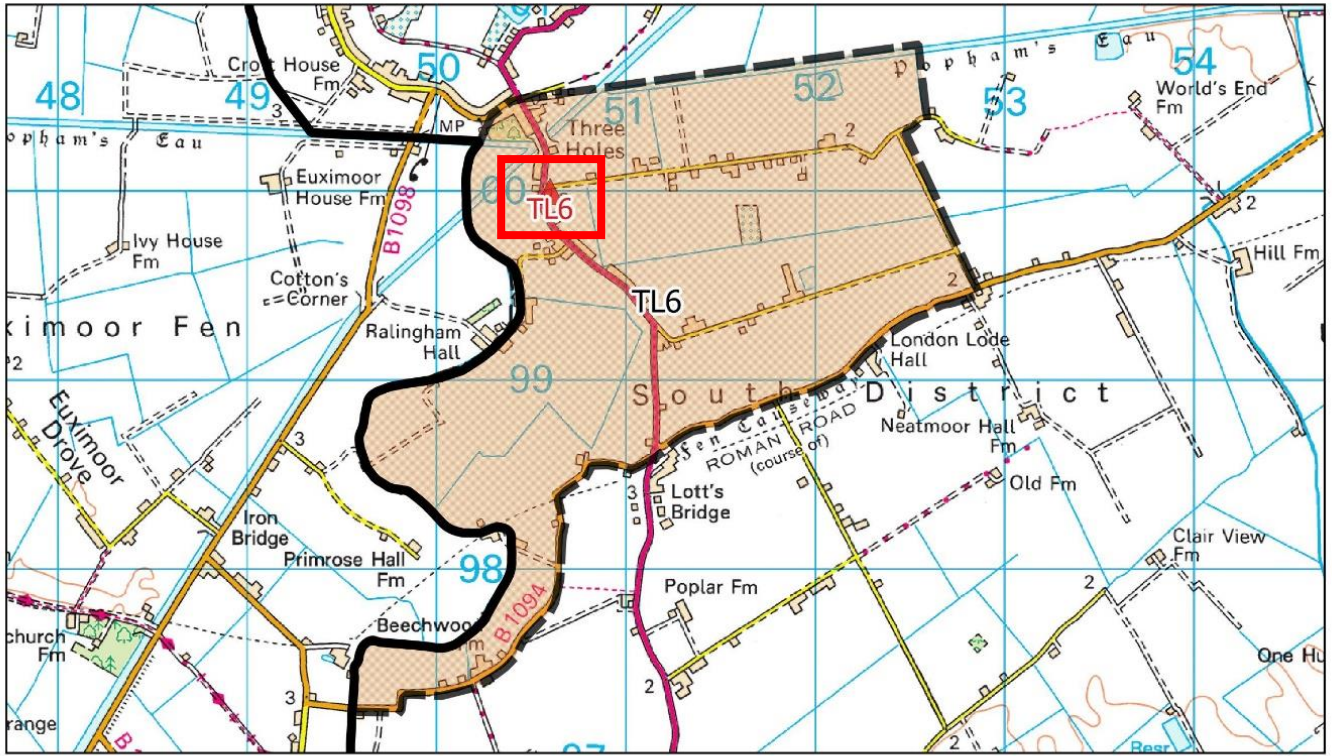
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31/08/2023

Polling District:	SJ6 – Castle Acre (Massingham With Castle Acre Borough Ward)
Area of Polling Place:	The Parish of Castle Acre
Polling Station:	Castle Acre Village Hall, Pye's Lane, Castle Acre, KING'S LYNN, PE32 2XB
Electorate:	700
Proposed Changes:	None
Consultee Comments:	<p>17th October 2023 – By Email. Respondent: Helen Breach.</p> <p><i>Dear Andrew Barrett Polling District Review On behalf of Castle Acre Village Hall, I am pleased to read in the review that Castle Acre Village Hall will continue to host polling days. The hall has recently been decorated and the kitchen refurbished, an even better facility for polling officers. Thanks again Kind regards Helen</i></p>

Returning Officer Comments:	No alterations to existing arrangements requested
Recommendation:	No alterations to existing polling district



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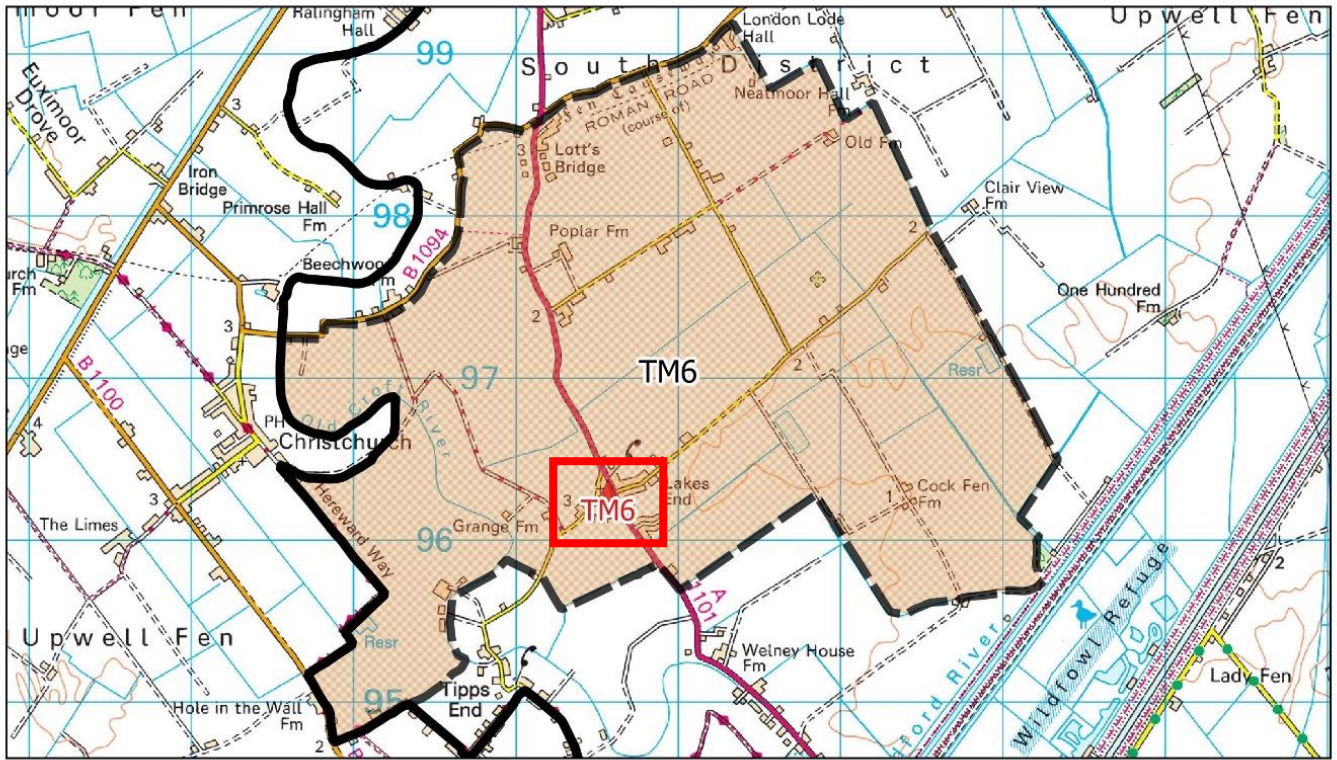
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 31/08/2023

Polling District:	TL6 – Upwell (Upwell & Delph Borough Ward)
Area of Polling Place:	The Parish of Upwell (known as Christchurch and Three Holes)
Polling Station:	Three Holes Village Hall, Squires Drove, Three Holes, WISBECH, PE14 9JY
Electorate:	438
Proposed Changes:	None
Consultee Comments:	<p>30th October 2023 – By Email. Respondent: Maurice Leeke</p> <p><i>I would like to make the following comments on the Polling District Review.</i></p> <p><i>There appears to be a change in the boundary between two of the polling districts in Upwell parish which will split Lot's Bridge by having the boundary running along the B1094 road. At present all of these properties, on both sides of the road, appear to be in TM6. This makes much more sense. The only Lot's</i></p>

	<p><i>Bridge property in TL6 at present appears to be Rheims Lodge, Main Road. I would suggest a boundary to the north of Rheims Lodge would mean that all of Lot's Bridge used the same polling station at Lakesend. Recommendation: move the boundary between TL6 and TM6 to the north of Rheims Lodge and the B1094 so that Rhiems Lodge and all the properties along the B1094 are included in TM6.</i></p> <p><i>I am very happy to discuss these recommendations if it would be helpful.</i> <i>Maurice Leeke</i></p>
<p>Returning Officer Comments:</p>	<p>There are currently three polling districts that serve the parish of Upwell. They uniformly serve the same elections – namely Upwell Parish Council, Upwell & Delph Borough Ward and Marshland South County Division and South West Norfolk Parliamentary Constituency.</p> <p>The B1094 road forms a clear demarcation line between TM6 – Upwell and TL6 – Upwell polling districts.</p> <p>Moving the boundary would decrease elector convenience at Rheims Lodge. The distance between Rheims Lodge and the existing TL6 polling station is estimated at 1km. The distance between Rheims Lodges and the TM6 polling station is 1.5km.</p> <p>Request not supported for rationale above. Elector convenience would be decreased for voting in identical elections and clear demarcation line lost.</p>
<p>Recommendation:</p>	<p>No alterations to existing polling district</p>



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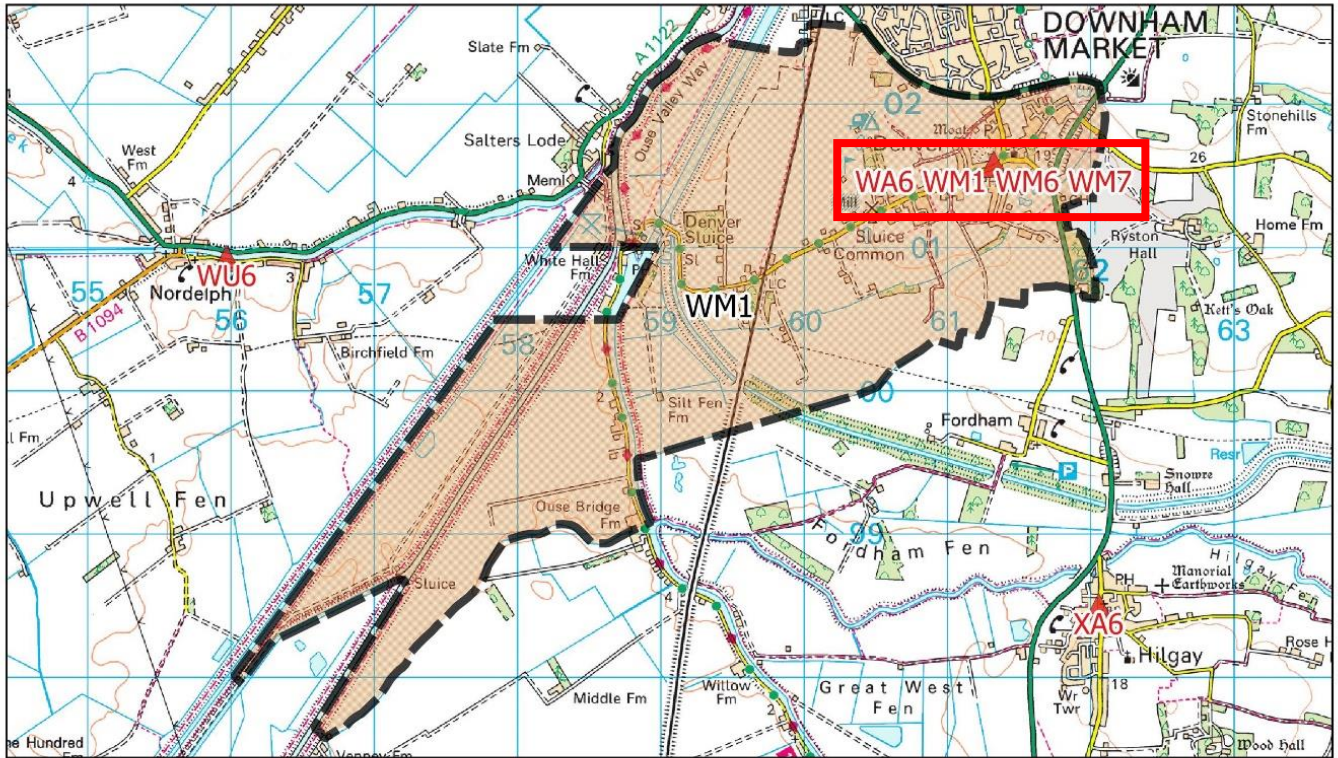
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31/08/2023

Polling District:	TM6 – Upwell (Upwell & Delph Borough Ward)
Area of Polling Place:	The Parish of Upwell (known as Lakes End)
Polling Station:	Lakes End Village Hall, Main Road, Lakes End, Welney, WISBECH, PE14 9QH
Electorate:	245
Proposed Changes:	None
Consultee Comments:	<p>30th October 2023 – By Email. Respondent: Maurice Leeke</p> <p><i>I would like to make the following comments on the Polling District Review.</i></p> <p><i>There appears to be a change in the boundary between two of the polling districts in Upwell parish which will split Lot's Bridge by having the boundary running along the B1094 road. At present all of these properties, on both sides of the road, appear to be in TM6. This makes much more sense. The only Lot's Bridge</i></p>

	<p><i>property in TL6 at present appears to be Rheims Lodge, Main Road. I would suggest a boundary to the north of Rheims Lodge would mean that all of Lot's Bridge used the same polling station at Lakesend. Recommendation: move the boundary between TL6 and TM6 to the north of Rheims Lodge and the B1094 so that Rhiems Lodge and all the properties along the B1094 are included in TM6.</i></p> <p><i>I am very happy to discuss these recommendations if it would be helpful.</i> <i>Maurice Leeke</i></p>
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<p>Recommendation</p>	<p>No alterations to existing polling district</p>



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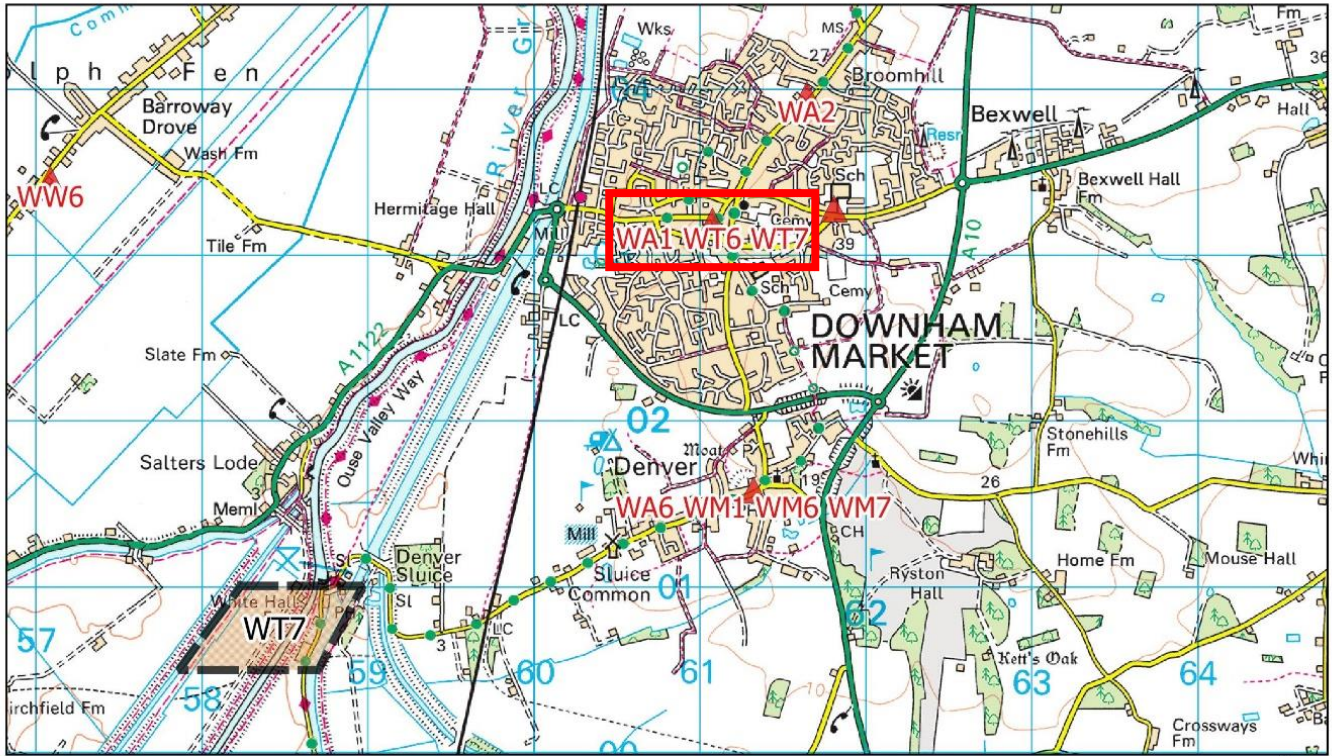
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1:46,500
31/08/2023

Polling District:	WM1 – Denver (Denver Borough Ward)
Area of Polling Place:	The Parish of Denver excluding the Whitehall Farm area
Polling Station:	Denver Village Hall, Sluice Road, Denver, DOWNHAM MARKET, PE38 ODY
Electorate:	746
Proposed Changes:	None
Consultee Comments:	<p>30th October 2023 – By Email. Respondent: Maurice Leeke</p> <p><i>I would like to make the following comments on the Polling District Review.</i></p> <p><i>There is a separate Polling District for two, currently unoccupied, dwellings by Denver Sluice. I have no idea why it was a separate polling district in the first place, but suggest that now, while they are unoccupied, is a good time to merge</i></p>

	<p><i>them into the Denver polling district. Recommendation: remove polling district WT7 and merge it with WM1.</i></p> <p><i>I am very happy to discuss these recommendations if it would be helpful.</i></p> <p><i>Maurice Leeke</i></p>
<p>Returning Officer Comments:</p>	<p>WT7 – Denver polling district was created to ensure maximum convenience for any residents at the two properties mentioned in the consultee feedback. The properties are on the other side of Denver sluice and the main WM1 – Denver polling district. Access to the WM1 - Denver polling station is via the Bridge Road / Station Road bridge at Downham Market. It is believed WT7 – Denver polling district was created before the creation of the A1122 link road to the A10, which created better access to Denver. Prior to its creation, attending the Downham Market Town Hall poll station would have been more convenient for the electors at the two properties than Denver Village Hall poll station. Journey times by car to each polling station from the two properties is likely similar when factoring in town centre driving and parking.</p> <p>Consultee request supported for rationale above. There would be minimal impact on elector convenience, and it would eliminate additional administration at election times.</p>
<p>Recommendation:</p>	<p>Re-integrate WT7 – Denver polling district within WM1 – Denver polling district.</p>



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1:40,000
31/08/2023

Polling District:	WT7 – Denver (Denver Borough Ward)
Area of Polling Place:	The Parish of Denver known as the Whitehall Farm area and that part of the Parish of Downham Market (Downham Old Town Ward) containing its Polling Station
Polling Station:	Downham Market Town Hall, Bridge Street, DOWNHAM MARKET, PE38 9DW <i>Note: Dual polling station</i>
Electorate:	0 (2 properties on register, currently empty)
Proposed Changes:	None
Consultee Comments:	30 th October 2023 – By Email. Respondent: Maurice Leeke <i>I would like to make the following comments on the Polling District Review.</i> <i>There is a separate Polling District for two, currently unoccupied, dwellings by Denver Sluice. I have no idea why it was a separate polling district in the first</i>

	<p><i>place, but suggest that now, while they are unoccupied, is a good time to merge them into the Denver polling district. Recommendation: remove polling district WT7 and merge it with WM1.</i></p> <p><i>I am very happy to discuss these recommendations if it would be helpful.</i> <i>Maurice Leeke</i></p>
<p>Returning Officer Comments:</p>	<p>WT7 – Denver polling district was created to ensure maximum convenience for any residents at the two properties mentioned in the consultee feedback. The properties are on the other side of Denver sluice and the main WM1 – Denver polling district. Access to the WM1 - Denver polling station is via the Bridge Road / Station Road bridge at Downham Market. It is believed WT7 – Denver polling district was created before the creation of the A1122 link road to the A10, which created better access to Denver. Prior to its creation, attending the Downham Market Town Hall poll station would have been more convenient for the electors at the two properties than Denver Village Hall poll station. Journey times by car to each polling station from the two properties is likely similar when factoring in town centre driving and parking.</p> <p>Consultee request supported for rationale above. There would be minimal impact on elector convenience, and it would eliminate additional administration at election times.</p>
<p>Recommendation:</p>	<p>Re-integrate WT7 – Denver polling district within WM1 – Denver polling district.</p>

REPORT TO CABINET

Open		Would any decisions proposed:			
Any especially affected Wards	Discretionary	Be entirely within Cabinet's powers to decide	NO	Need to be recommendations to Council	YES
None		Is it a Key Decision	YES		
Lead Members: E-mail: Cllr Chris Morley Cllr.chris.morley@west-norfolk.gov.uk		Other Cabinet Members consulted:			
		Other Members consulted: Corporate Performance Panel meeting 4 January 2024 (with members of Environment & Community and Regeneration & Development Panels present).			
Lead Officer: Jo Stanton, Revenues and Benefits Manager E-mail: joanne.stanton@west-norfolk.gov.uk		Other Officers consulted: Michelle Drewery, s151 Officer and Assistant Director, Resources			
Financial Implications YES	Policy/ Personnel Implications NO	Statutory Implications NO	Equal Impact Assessment YES If YES: Pre-screening	Risk Management Implications NO	Environmental Considerations NO
If not for publication, the paragraph(s) of Schedule 12A of the 1972 Local Government Act considered to justify that is (are) paragraph(s) NA					

Date of meeting: 15 January 2024

COUNCIL TAX PREMIUMS FOR LONG-TERM EMPTY PROPERTIES AND SECOND HOMES

Summary

The Levelling Up and Regeneration Act 2023 (the Act) introduces powers for billing authorities in England to charge the existing 100% premium for long term empty properties after one year, rather than the current period of two years, and to charge an additional council tax premium of up to 100% for second homes.

This report details these changes and makes recommendations for Cabinet and Council.

Recommendation

Cabinet recommends to Council to agree to:

- **Charge the long-term empty property premium after 12 months from 1 April 2024,**
- **Charge a 100% premium for second homes falling into Class B from 1 April 2025,**
- **Adopt the Council Tax Discounts Resolution as at Section 7 of Appendix C,**
- **Work with other Norfolk authorities and Norfolk County Council to ensure the maximum possible amount of the additional second homes income is returned to those boroughs most affected by second home ownership and,**
- **Delegate authority to the Revenues and Benefits Manager, in consultation with the s151 Officer and Council Leader, to agree the technical guidelines for any exceptions to the premiums imposed by central government.**

Reason for Decision

To decide whether the provisions within sections 79 and 80 of the Levelling Up and Regeneration Act 2023 regarding additional premiums should be implemented.

1. Background

- 1.1. Section 79 of the Levelling Up and Regeneration Act 2023 allows billing authorities to apply the existing 100% premium for long term empty properties after a property has been empty for one year rather than the current time of two years. This change can be made from 1 April 2024. More details are in section 2.
- 1.2. Section 80 of the Levelling Up and Regeneration Act 2023 allow billing authorities to charge an additional premium of 100% on a property which is substantially furnished and where there is no resident (i.e., second homes, referred to in the Act as 'dwellings occupied periodically'). The Act sets out that we must give at least 12 months' notice of this change so charges in relation to this part of the legislation can only be implemented from 1 April 2025. More details are in section 3.

2. Long Term Empty Property Premium

- 2.1. For council tax purposes an empty property is defined as one which is unfurnished and no-one's main home. A long-term empty property is one which has been empty for more than six months once any property exemptions have ended.
- 2.2. The date used for working out when the premium starts excludes any time when a property is exempt, for example whilst awaiting probate, because the owner is in care, or for another reason.
- 2.3. From 2019 we have been able to charge an additional premium for long term empty properties based on the length of time they have remained empty. The current premiums are shown below:

Time empty	Premium	Total Council Tax Charge	Current number of properties
Empty between two and five years	100%	200%	230
Empty between five and ten years	200%	300%	77
Empty over ten years	300%	400%	42
Total			349

- 2.4. The Act now allows us to charge the existing 100% premium for a long-term empty property after one year rather than the current two years. Provided the premium is agreed by full Council by 31 March 2024 it can be charged from 1 April 2024.
- 2.5. Charging the premium for properties empty for a shorter time means a further 555 properties will incur the premium making a total of 904 properties. This increases our taxbase by an extra 370 band D equivalent properties¹ raising an additional

¹ The current taxbase for 2024/2025 is 53,748 Band D equivalent properties

£0.78m in council tax which will be shared between the preceptors in proportion to their share of the council tax bill:

Preceptor	Share	Amount (m)
Norfolk County Council	75.3%	£0.59
Police and Crime Commissioner	14.3%	£0.11
BCKLWN	6.8%	£0.05
Parishes	3.5%	£0.03
Total	100.0%	£0.78

2.6. The intention of the premium is to encourage empty properties back into use as owners sell or let their properties to avoid the additional charge. This will be the case for some, but not all, long-term empty properties so any financial benefits from the additional premium are estimates of the maximum amount that can be raised and are not included in our taxbase for 2024/2025.

3. Second Home Premium

3.1. For council tax purposes a second home is defined as a one which is furnished but which is no-one's main home.

3.2. There are two classes of second home in the council tax regulations. Class A second homes are those with an occupancy restriction, usually due to a seasonal flooding risk. These account for fewer than 5% of all second homes. They cannot be lived in all year round so could not be used as someone's main home and for this reason they are excluded from these changes.

3.3. Class B second homes do not have an occupancy restriction and will be subject to the additional premium.

3.4. The regulations state the default reduction for a second home is 50% but from 2004 we have been able to reduce this discount. We changed the discount to 10% from 2004, 5% from 2013 and abolished it completely from 2016. Taxpayers now pay the full council tax charge for a Class B second home in the borough. They also pay the full charge for a Class A second home for the days when there is no occupancy restriction but are exempt from council tax for the days when an occupancy restriction applies.

3.5. The Act now allows us to charge an additional premium of up to 100% for second homes, i.e., properties which are furnished and no-one's main home. This means they will pay double the standard council tax charge.

3.6. There are approximately 3,200 second homes in the borough which could be charged the additional premium. These include:

- Properties let as holiday accommodation on a commercial basis but which are only available for let for fewer than 140 days (20 weeks) a year,
- Properties let as holiday accommodation on a commercial basis, are available for let for more than 140 days (20 weeks) a year but are not actually let for at least 70 days a year²,

² From April 2023 the government has updated the rules for second homes. To be shown in the business rates list a property must be available for let for at least 140 days a year, and actually let on a commercial basis for at least 70 days in the previous year. If it does not meet this criteria it will be included in the council tax list.

- Properties which are private second homes and are never let out commercially, and
 - Furnished rental properties when they are vacant between tenants.
- 3.7. We are not currently able to record which category a property falls into, so a breakdown is not available. This will be investigated further if the premium is agreed as it will require a software change from our suppliers.
- 3.8. The premium does not apply to any self-catering holiday accommodation shown in the business rates list, and there are a small number of second homes in the council tax list which would not be liable for the premium³. Class A second homes (those with an occupancy restriction) will also not be charged the premium as they cannot be lived in all year round.
- 3.9. The government may make regulations excluding certain categories of second homes from the premium, although this is likely to be in January 2024 at the earliest. It is likely any exclusion will be a statutory requirement so will not need further Member approval, however Officer delegated authority is requested to allow technical guidelines for any exceptions to be agreed and implemented in a timely manner.
- 3.10. The second home premium can only start from 1 April of a financial year, and we must make the initial decision at least 12 months in advance. Provided the premium is agreed by full Council by 31 March 2024 it can be charged from **1 April 2025**. It can then be varied or revoked providing the decision is made before the start of the next financial year.
- 3.11. There are approximately 3,200 second homes in the borough's council tax list, representing 4.2% of the total number of council tax properties. 85% are in the northern parishes, 10% are in the central area and 5% are in the southern parishes. A full breakdown is included at Appendix B.
- 3.12. The parishes with the highest percentage of second homes in October 2023 are:
- | | |
|----------------------|-------|
| • Burnham Overy | 48.3% |
| • Holme Next The Sea | 41.9% |
| • Thornham | 41.3% |
| • Brancaster | 40.6% |
| • Old Hunstanton | 35.6% |
- 3.13. Charging a premium of 100% on second homes will increase the taxbase by 3,078 band D properties (over 5.7%) and will raise an **additional £6.5m in council tax** (based on 2023/2024 charges).
- 3.14. This amount is shared between the preceptors, including the Parish and Town Councils, in proportion to their share of the council tax bill. £4.90m (75.3%) of the additional income will go to Norfolk County Council, £0.93m (14.3%) to the Police and Crime Commissioner and we will only keep our 6.8% share of £0.44m. 3.5% will go the individual Parish and Town Councils who will benefit where they have significant numbers of second homes.

³ Second homes owners still receive the statutory 50% discount if they are liable for council tax for another job-related dwelling as they are in the Armed Forces or Clergy.

3.15. The shares of the additional income are:

Preceptor	Share	Amount (m)
Norfolk County Council	75.3%	£4.90
Police and Crime Commissioner	14.3%	£0.93
BCKLWN	6.8%	£0.44
Parishes	3.5%	£0.23
Total	100.0%	£6.50

3.16. Members will need to determine how this extra income is used and prioritised to support delivery of the new Corporate Strategy and the council's long term financial sustainability. We will seek to work with other Norfolk authorities and Norfolk County Council to ensure the maximum possible amount of the additional second homes income is returned to those boroughs most affected by second home ownership.

4. Recommendations

4.1. Cabinet recommends to Council to agree to:

4.1.1. Charge the long-term empty property premium after 12 months from 1 April 2024,

4.1.2. Charge a 100% premium on second homes falling in Class B from 1 April 2025,

4.1.3. Support working with other Norfolk authorities and Norfolk County Council to ensure the maximum possible amount of the additional second homes income is returned to those boroughs most affected by second home ownership,

4.1.4. Adopt the Council Tax Discounts Resolution 2024/2025 as at Section 7 of Appendix C

4.1.5. Delegate authority to the Revenues and Benefits Manager, in consultation with the s151 Officer and Council Leader, to agree the technical guidelines for any exceptions to the premiums imposed by central government.

5. Policy Implications

5.1. This would be a change to the existing policy for discounts for long-term empty properties and second homes.

6. Financial Implications

6.1. The Financial Implications on the taxbase are detailed in sections 3 and 4.

6.2. Any person who is impacted by discount changes is able to apply for a discretionary reduction under s13a Local Government Finance Act 1992 under our existing processes. Their application will be considered by the Revenues and Benefits Manager in consultation with the Council Leader.

7. Personnel Implications

7.1. None

8. Environmental Considerations

8.1. None

9. Statutory Considerations

9.1. The decisions on the discounts for empty properties and second homes are at our discretion, subject to certain statutory requirements as part of the decision making process. Decisions must be made by the end of the financial year, i.e., 31 March, but we must give at least 12 months' notice before charging the second homes premium.

9.2. This means the long-term empty changes can be made from 1 April 2024, and the second home changes from 1 April 2025.

10. Equality Impact Assessment (EIA)

10.1. A Pre-Screening EIA is attached at Appendix A.

11. Risk Management Implications

11.1. There is a risk that taxpayers may try and claim a property is now their main home rather than their second home to avoid paying the premiums. We already have procedures in place for this scenario and will look to strengthen these before any changes come into effect.

11.2. Different charges and policies in neighbouring districts may cause movement into or out of the borough depending on which authority has the most affordable scheme. North Norfolk District Council has already agreed to charge the premium.

11.3. However taxpayers may choose to sell their properties instead of paying the premium, bringing more housing stock into the local area which may make properties in areas of high second home ownership more affordable.

12. Declarations of Interest / Dispensations Granted

12.1. None

13. Background Papers

13.1. None

Pre-Screening Equality Impact Assessment

Borough Council of
King's Lynn &
West Norfolk



Name of policy	Council Tax Discounts Resolution 2024/2025				
Is this a new or existing policy/service/function?	Existing				
Brief summary/description of the main aims of the policy/service/function being screened. Please state if this policy/service is rigidly constrained by statutory obligations	Amendments to the council tax charges for long-term empty properties and second homes. The decision is discretionary but rules around the decision making process are statutory				
Question	Answer				
<p>1. Is there any reason to believe that the policy/service/function could have a specific impact on people from one or more of the following groups according to their different protected characteristic, for example, because they have particular needs, experiences, issues or priorities or in terms of ability to access the service?</p> <p>Please tick the relevant box for each group.</p> <p>NB. Equality neutral means no negative impact on any group.</p>		Positive	Negative	Neutral	Unsure
	Age			√	
	Disability			√	
	Gender			√	
	Gender Re-assignment			√	
	Marriage/civil partnership			√	
	Pregnancy & maternity			√	
	Race			√	
	Religion or belief			√	
	Sexual orientation			√	
Other (eg low income)			√		

Question	Answer	Comments
2. Is the proposed policy/service likely to affect relations between certain equality communities or to damage relations between the equality communities and the Council, for example because it is seen as favouring a particular community or denying opportunities to another?	No	
3. Could this policy/service be perceived as impacting on communities differently?	No	
4. Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?	No	
5. Are any impacts identified above minor and if so, can these be eliminated or reduced by minor actions? If yes, please agree actions with a member of the Corporate Equalities Working Group and list agreed actions in the comments section	N/A	Actions:
		Actions agreed by EWG member:
<p>If 'yes' to questions 2 - 4 a full impact assessment will be required unless comments are provided to explain why this is not felt necessary:</p> <p>The policy is intended to bring empty properties back into use and will affect communities where there are significant numbers of second homes. The policy will therefore impact on communities, rather than individuals, and is not linked to any equality issues or protected characteristics.</p> <p>Decision agreed by EWG member:</p>		
Assessment completed by:		
Name	Jo Stanton	
Job title	Revenues and Benefits Manager	
Date	28 November 2023	

Appendix A – Second Homes by Parish

Council Tax Figures - 2 October 2023 (including Job Related discounts)		Actual Number of Domestic Properties	Number of Domestic Properties classified as Second Homes Top 5	% Second Homes Top 5
Taxbase Report		Line 1	Line 11	
King's Lynn	PAR001	19,189	104	0.5%
Bawsey	PAR011	123	0	0.0%
Castleacre	PAR012	487	33	6.8%
Castle Rising	PAR013	113	0	0.0%
Clenchwarton	PAR014	1,016	1	0.1%
Congham	PAR015	121	4	3.3%
Gayton	PAR016	765	11	1.4%
Grimston	PAR017	954	18	1.9%
Leziate	PAR018	267	2	0.7%
Great Massingham	PAR019	485	31	6.4%
Little Massingham	PAR020	50	2	4.0%
Middleton	PAR021	685	9	1.3%
Pentney	PAR022	304	18	5.9%
Roydon	PAR023	154	1	0.6%
North Runcton	PAR024	264	4	1.5%
Terrington St Clement	PAR025	1,968	12	0.6%
Terrington St John	PAR026	407	2	0.5%
Tilney All Saints	PAR027	268	5	1.9%
Tilney St Lawrence	PAR028	741	3	0.4%
Walpole	PAR029	817	4	0.5%
Walpole Cross Keys	PAR030	241	0	0.0%
Walpole Highway	PAR031	348	3	0.9%
Walsoken	PAR032	727	6	0.8%
East Walton	PAR033	37	1	2.7%
West Walton	PAR034	802	7	0.9%
Westacre	PAR035	97	4	4.1%
Wiggenhall St Germans	PAR036	627	2	0.3%
East Winch	PAR037	387	5	1.3%
West Winch	PAR039	1,270	7	0.6%
North Wootton	PAR040	1,015	1	0.1%
South Wootton	PAR041	1,841	9	0.5%
Barton Bendish	PAR101	104	5	4.8%
Boughton	PAR102	114	2	1.8%
Crimplesham	PAR103	121	3	2.5%
Denver	PAR104	432	4	0.9%
Dereham (West)	PAR105	202	3	1.5%
Downham Market	PAR106	5,555	29	0.5%
Downham West	PAR107	143	1	0.7%
Emneth	PAR108	1,248	7	0.6%

Feltwell	PAR109	1,355	7	0.5%
Fincham	PAR110	252	2	0.8%
Fordham	PAR111	32	0	0.0%
Hilgay	PAR112	627	6	1.0%
Hockwold	PAR113	596	10	1.7%
Marham	PAR114	1,081	3	0.3%
Marshland St James	PAR115	612	2	0.3%
Methwold	PAR116	787	7	0.9%
Nordelph	PAR117	205	2	1.0%
Northwold	PAR118	567	13	2.3%
Outwell	PAR119	1,052	7	0.7%
Runcton Holme	PAR120	305	2	0.7%
Ryston	PAR121	49	0	0.0%
Shouldham	PAR122	294	5	1.7%
Shouldham Thorpe	PAR123	74	2	2.7%
Southery	PAR124	620	2	0.3%
Stoke Ferry	PAR125	540	8	1.5%
Stow Bardolph	PAR126	576	7	1.2%
Stradsett	PAR127	31	2	6.5%
Tottenhill	PAR128	105	2	1.9%
Upwell	PAR129	1,332	13	1.0%
Watlington	PAR130	1,163	11	0.9%
Welney	PAR131	268	5	1.9%
Wereham	PAR132	329	1	0.3%
Wiggenhall St Mary Magdalen	PAR133	327	1	0.3%
Wimbotsham	PAR134	330	1	0.3%
Wormegay	PAR135	174	5	2.9%
Wretton	PAR136	186	1	0.5%
Amner	PAR201	31	0	0.0%
Bagthorpe (with Barmer)	PAR202	29	1	3.4%
Barwick	PAR203	24	3	12.5%
Bircham	PAR204	259	36	13.9%
Brancaster	PAR205	778	316	40.6%
Burnham Market	PAR206	683	197	28.8%
Burnham Norton	PAR207	69	22	31.9%
Burnham Overy	PAR208	240	116	48.3%
Burnham Thorpe	PAR209	102	25	24.5%
Choseley	PAR210	13	4	30.8%
Creake (North)	PAR211	224	46	20.5%
Creake (South)	PAR212	348	80	23.0%
Dersingham	PAR213	2,435	57	2.3%
Docking	PAR214	702	126	17.9%
Flitcham	PAR215	99	4	4.0%
Fring	PAR216	44	10	22.7%
Harpley	PAR217	176	14	8.0%
Heacham	PAR218	2,754	300	10.9%
Hillington	PAR219	149	3	2.0%

Holme-next-Sea	PAR220	222	93	41.9%
Houghton	PAR221	42	3	7.1%
Hunstanton	PAR222	3,160	521	16.5%
Old Hunstanton	PAR223	354	126	35.6%
Ingoldisthorpe	PAR224	420	15	3.6%
Ringstead	PAR225	185	45	24.3%
East Rudham	PAR226	297	31	10.4%
West Rudham	PAR227	120	12	10.0%
Sandringham	PAR228	215	9	4.2%
Sedgeford	PAR229	311	53	17.0%
Sherborne	PAR230	27	1	3.7%
Snettisham	PAR231	1,612	180	11.2%
Stanhoe	PAR232	141	43	30.5%
Syderstone	PAR233	278	43	15.5%
Thornham	PAR234	375	155	41.3%
Titchwell	PAR235	59	20	33.9%
		75,335	3,200	4.2%

Appendix C – Council Tax Discounts Resolution 2024/2025

BOROUGH COUNCIL OF KING'S LYNN AND WEST NORFOLK

Council Meeting – 31 January 2024

DETERMINATION OF COUNCIL TAX DISCOUNTS RELATING TO SECOND HOMES AND EMPTY DWELLINGS FOR 2024/2025

1. Section 75 of the Local Government Act 2003 gives billing authorities the power to determine the discounts for second homes and long-term empty dwellings. Section 11 of the Local Government Finance Act 2012 gives billing authorities powers to determine discounts for further classes of empty dwellings. Section 12 of the Local Government Finance Act 2012 gives billing authorities powers to set a higher amount of council tax for long term empty dwellings. The Rating (Property in Common Occupation) and Council Tax (Empty Dwellings) Act 2018 allows billing authorities to further increase the amount of council tax for long term empty dwellings from 1 April 2019. Section 79 of the Levelling-Up and Regeneration Act 2023 allows billing authorities to vary the date the long-term empty property levy is charged from. Section 80 of the Levelling-Up and Regeneration Act 2023 allows billing authorities to charge a higher amount of council tax for dwellings which are furnished and unoccupied.
2. The council must approve its determination afresh for each class of dwelling for each financial year.

3. Current Position for 2023/2024

- 3.1. The Council Tax (Prescribed Classes of Dwellings) (England) Regulations 2003 and the Council Tax (Prescribed Classes of Dwellings) (England) (Amendment) Regulations 2012 prescribe the following classes of dwelling:

- 3.1.1. **Class A** – a chargeable dwelling:

- (a) which is not the sole or main residence of an individual;
- (b) which is furnished; and
- (c) the occupation of which is prohibited by law for a continuous period of at least 28 days in the relevant year.

Class A dwellings are commonly known as **Second Homes with an Occupancy Restriction**.

The reduction for Class A dwellings for 2023/2024 is 0% with an exemption for the period of the occupancy restriction.

- 3.1.2. **Class B** – a chargeable dwelling

- (a) which is not the sole or main residence of an individual;
- (b) which is furnished; and
- (c) the occupation of which is not prohibited by law for a continuous period of at least 28 days in the relevant year.

Class B dwellings are commonly known as **Second Homes**.

The reduction for Class B dwellings for 2023/2024 is 0%.

- 3.1.3. **Class C** – a chargeable dwelling which is:

- (a) which is unoccupied; and
- (b) which is substantially unfurnished

Class C dwellings are commonly known as **Empty Dwellings**

The reduction for a Class C dwelling for 2023/2024 is 0%.

3.1.4. **Class D** – a chargeable dwelling

- (a) which has satisfied the requirements of (b) for fewer than 12 months
 - (b) which is vacant; and
 - i. requires or is undergoing major repair work to render it habitable
 - ii. is undergoing structural alteration
 - iii. has undergone major repair work to render it habitable if fewer than six months have elapsed since the date on which the alteration was substantially completed and the dwelling has continuously remained vacant since that date
 - (c) for the purpose of (b) 'major repair work' refers to structural repair work
- NB once the 12 month time limit has expired dwellings in Class D fall to be treated as dwellings in Class C*

Class D dwellings are commonly known as **Uninhabitable Dwellings**.

The reduction for a Class D dwelling for 2023/2024 is 25% for the 12 month maximum period. Once the 12 months expire a reduction of 0% applies.

3.2. Class A and Class B dwellings do not include any dwelling which consists of a pitch occupied by a caravan or a mooring occupied by a boat. Neither do they include any dwelling where a qualifying person in relation to that dwelling is a qualifying person in relation to another dwelling which for him/her is job-related.

3.3. Premiums for Second Homes

3.4. The discount for properties falling into Class A and Class B of the regulations (Second Homes) has been set at 0% since 2016. The Levelling-Up and Regeneration Act 2023 allows us to increase the charge for these properties by up to 100% after giving at least 12 months' notice.

3.5. Properties in Class A cannot be occupied all year round as they have a planning restriction limiting their occupancy. As these cannot be used as someone's main home no additional charge will be made.

3.6. Properties in Class B can be occupied as a main home, and these properties will be charged an additional 100% council tax premium from 1 April 2025.

3.7. Central government may make regulations excluding certain classes of property from the second home premium. These will be removed from the premium as and when regulations are laid.

3.8. Long Term Empty Dwelling Levies

3.9. The Local Government Finance Act 2012 allows billing authorities to increase the amount of council tax payable in respect of a long term empty dwelling by a specified percentage of not more than 50% up to 31 March 2019.

- 3.10. The Rating (Property in Common Occupation) and Council Tax (Empty Dwellings) Act 2018 allows billing authorities to increase this to 100% from 1 April 2019 for properties empty for more than two years. The Act further allows billing authorities to increase the amount of council tax payable by 200% for properties empty for longer than five years from 1 April 2020, and by 300% for properties empty longer than 10 years from 1 April 2021.
- 3.11. The Act originally defined a Long-Term Empty Dwelling as ‘a dwelling that is unoccupied and substantially unfurnished for a continuous period of at least two years’. Any period of occupation of fewer than six weeks is discounted when establishing the continuous two year period.
- 3.12. The Levelling-Up and Regeneration Act 2023 amends the definition of a Long-Term Empty Dwelling from 1 April 2024 to ‘a dwelling that is unoccupied and substantially unfurnished for a continuous period of at least **one year**’.
- 3.13. Central Government may also prescribe classes of dwelling exempt from the Long Term Empty Dwelling levy. The Council Tax (Prescribed Classes of Dwellings) (England) (Amendment) Regulations 2012 prescribe the following classes of dwelling to which the levy will not apply:
- 3.13.1. **Class E** – a chargeable dwelling which would be the sole or main residence of a person but is empty because that person is resident in Ministry of Defence accommodation by reason of their employment.
- 3.13.2. **Class F** – a chargeable dwelling which is an annexe of a main dwelling but is being used as a part of that dwelling.
- 3.14. The additional levy for long term empty dwellings for 2023/2024 is:
- 3.14.1. 100% for properties empty for more than two years,
3.14.2. 200% for properties empty for more than five years, and
3.14.3. 300% for properties empty for more than 10 years.

Dwellings falling into Class E and Class F are exempt from the Long Term Empty Dwelling Levy.

4. Proposals for 2024/2025 and 2025/2026

- 4.1. The levels of discount for 2023/2024 are shown above for information. The report to Council of 31 January 2024 contains recommendations for updates to these discounts, levies and premiums from 2024/2025 onwards as shown at section 7 below.
- 4.2. In accordance with statutory council tax reductions, any period of occupation of fewer than six weeks will be disregarded when calculating the maximum time a reduction can be awarded for, and when calculating the start date of any levy payment. The occupier will still be charged the occupied council tax rate for the time they live in the dwelling, but the clock will not be reset when they leave if they have been in occupation for fewer than six weeks.
- 4.3. An individual who is caused hardship by the level of council tax discount under this resolution can apply for a reduction on their council tax bill. Applications will be determined by the Revenues and Benefits Manager in consultation with the Council Leader and the relevant Ward Member/s where appropriate.

- 4.4. The regulations stipulate these determinations must be published in at least one local newspaper within 21 days of Council agreement.

5. Policy Implications

- 5.1. The decision is an update of the Council's policy on Council Tax discounts relating to Second Homes and Empty Properties.

6. Financial Implications

- 6.1. These discounts form part of the taxbase calculations and can affect the council's income. The existing discounts have been reflected in the taxbase calculation and the revised discounts will be included in the taxbase for 2025/2026. The taxbase remains in line with the estimates in the Financial Plan.

7. Recommendations:

Under Section 11A of the Local Government Finance Act 1992, as enacted by Section 75 of the Local Government Act 2003, Section 11B of the Local Government Finance Act 1992, as enacted by Section 11 and Section 12 of the Local Government Finance Act 2012 and in accordance with the provisions of the Council Tax (Prescribed Classes of Dwellings) (England) Regulations 2003, the Council Tax (Prescribed Classes of Dwellings) (England) (Amendment) Regulations 2012, the Rating (Property in Common Occupation) and Council Tax (Empty Dwellings) Act 2018 and the Levelling-Up and Regeneration Act 2023 the Council determines:

- 1. That the council tax discount for Second Homes defined as being within Class A of the Regulations is set at 0% for 2024/2025;**
- 2. That the council tax discount for Second Homes as defined by Class B of the Regulations is set at:**
 - a. 0% for 2024/2025, and**
 - b. 0% for 2025/2026 plus an additional premium of 100%;**
- 3. That the council tax discount for Empty / Unfurnished dwellings defined as being within Class C of the Regulations is set at 0% for 2024/2025;**
- 4. That the council tax discount for Uninhabitable dwellings defined as being within Class D of the Regulations is set at the following for 2024/2025:**
 - a. 25% for 12 months starting on the day the dwelling becomes uninhabitable; then**
 - b. 0% once the 12 month period has expired;**
- 5. That the Levy rate for Long Term Empty Dwellings as defined in the Regulations is set as follows for 2024/2025:**
 - a. 100% for properties empty between one and five years,**
 - b. 200% for properties empty longer than five years, and**
 - c. 300% for properties empty longer than ten years;**

- 6. That any period of occupation of fewer than six weeks shall be disregarded when calculating the maximum period of a reduction or the start date of the Levy;**
- 7. That delegated authority be given to the Revenues and Benefits Manager, in consultation with the s151 Officer and Council Leader, to agree the technical guidelines for any exceptions to the premiums imposed by central government.**
- 8. That delegated authority be given for individual hardship applications made under s13a Local Government Finance Act 1992 be determined by the Revenues and Benefits Manager in consultation with the Council Leader and the relevant Ward Member/s where appropriate.**

In accordance with Section 11A(6) of the Local Government Finance Act 1992, as enacted by Section 75 of the Local Government Act 2003 and the Local Government Finance Act 2012, these determinations shall be published in at least one newspaper circulating in West Norfolk before the end of the period of 21 days beginning with the date of the determinations.

Pre-Screening Equality Impact Assessment

Borough Council of
King's Lynn &
West Norfolk



Name of policy	Council Tax Discounts Resolution 2024/2025				
Is this a new or existing policy/ service/function?	Existing				
Brief summary/description of the main aims of the policy/service/function being screened. Please state if this policy/service is rigidly constrained by statutory obligations	Amendments to the council tax charges for long-term empty properties and second homes. The decision is discretionary but rules around the decision making process are statutory				
Question	Answer				
<p>1. Is there any reason to believe that the policy/service/function could have a specific impact on people from one or more of the following groups according to their different protected characteristic, for example, because they have particular needs, experiences, issues or priorities or in terms of ability to access the service?</p> <p>Please tick the relevant box for each group.</p> <p>NB. Equality neutral means no negative impact on any group.</p>		Positive	Negative	Neutral	Unsure
	Age			√	
	Disability			√	
	Gender			√	
	Gender Re-assignment			√	
	Marriage/civil partnership			√	
	Pregnancy & maternity			√	
	Race			√	
	Religion or belief			√	
	Sexual orientation			√	
Other (eg low income)			√		

Question	Answer	Comments
2. Is the proposed policy/service likely to affect relations between certain equality communities or to damage relations between the equality communities and the Council, for example because it is seen as favouring a particular community or denying opportunities to another?	No	
3. Could this policy/service be perceived as impacting on communities differently?	No	
4. Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?	No	
5. Are any impacts identified above minor and if so, can these be eliminated or reduced by minor actions? If yes, please agree actions with a member of the Corporate Equalities Working Group and list agreed actions in the comments section	N/A	Actions:
		Actions agreed by EWG member:
<p>If 'yes' to questions 2 - 4 a full impact assessment will be required unless comments are provided to explain why this is not felt necessary:</p> <p>The policy is intended to bring empty properties back into use and will affect communities where there are significant numbers of second homes. The policy will therefore impact on communities, rather than individuals, and is not linked to any equality issues or protected characteristics.</p> <p>Decision agreed by EWG member: <i>C. Marriott</i></p>		
Assessment completed by:		
Name	Jo Stanton	
Job title	Revenues and Benefits Manager	
Date	28 November 2023	

REPORT TO CABINET

Open		Would any decisions proposed :			
Any especially affected Wards	None	Be entirely within Cabinet's powers to decide		NO	
		Need to be recommendations to Council		YES	
		Is it a Key Decision		NO	
Lead Member: Cllr T Parish E-mail: Cllr.Terry.Parish@West-Norfolk.gov.uk		Other Cabinet Members consulted: N/A			
		Other Members consulted: N/A			
Lead Officer: James Arrandale E-mail: James.Arrandale@West-Norfolk.gov.uk Direct Dial: 01553 616 653		Other Officers consulted: Becky Box			
Financial Implications NO	Policy/ Personnel Implications YES	Statutory Implications NO	Equal Impact Assessment NO: Pre-screening provided	Risk Management Implications YES	Environmental Considerations NO

Date of meeting: 15 January 2024

UPDATE OF WHISTLEBLOWING POLICY

Summary

The Council maintains a Whistleblowing Policy which sets out the protections given to staff, Members and relevant third parties where they report wrongdoing to the Council.

The Policy was drafted in 2017. It has now been reviewed and revised, taking into account matters raised by the Audit team. Key revisions include clarifications in a number of areas, a more robust structure for the assessment of whistleblowing reports, and a monitoring programme.

The Policy is also now supplemented by a Procedure, which addresses (i) how whistleblowing reports should be made, escalated and assessed, and (ii) the protections (in terms of employment rights) that whistleblowers will receive.

The revised Policy requires the approval of Full Council to be adopted.

For completeness, the Procedure does not require Full Council approval. It will be reviewed and approved by officers following consultation with UNISON.

Recommendation

Cabinet Resolves:

To make the below recommendation to Full Council

Recommendations to Full Council:

That the revised Whistleblowing Policy be approved and adopted

Reason for Decision

To ensure that the Policy is kept up-to-date and takes account of Audit recommendations.

1 Background

The Council adopted a Whistleblowing Policy in 2017. It has not since been revised.

Audit Recommendations were made in February 2021, and as with all Council policies, periodic review is also required.

The revised Policy takes into account the Audit Recommendations, and has been reviewed against other Local Authority policies. It makes various improvements including (i) a monitoring programme involving annual reports to Audit Committee, and (ii) provision to ensure continuing staff awareness.

The Policy is also now accompanied by a Procedure (staff-facing and therefore not requiring Council approval), which clarifies roles and responsibilities around the initial making of a report, how managers should address and escalate those reports, and how reports should be assessed. The Procedure appoints a team of three Whistleblowing Reporting Officers (Monitoring Officer, Senior Internal Auditor, AD Central Services) to assess whistleblowing reports and manage the actions required to deal with them.

2 Options Considered

None. The Policy requires revision.

3 Policy Implications

As set out in the revised Policy.

4 Financial Implications

None.

5 Personnel Implications

None. For completeness, UNISON will be consulted on any staff issues might arise on the Procedure; however, no issues are anticipated as the policy is designed to protect employment rights.

6 Environmental Considerations

None.

7 Statutory Considerations

The original Policy and the revised Policy take account of relevant Employment law (the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998), which protects employees against any retaliation by their employer as a result of reporting a concern, provided that the employee has a reasonable belief that it is in the public interest to report that concern. This is known as making a “protected disclosure”.

8 Equality Impact Assessment (EIA)

Pre-Screening Attached

9 Risk Management Implications

The amendments to the Policy should improve risk management.

10 Declarations of Interest / Dispensations Granted

N/A

11 Background Papers

Whistleblowing Procedure
Audit Recommendations 2021

Pre-Screening Equality Impact Assessment

Borough Council of
King's Lynn & West Norfolk



Name of policy/service/function	Whistleblowing Policy and Procedure				
Is this a new or existing policy/service/function?	Update of pre-existing policy				
<p>Brief summary/description of the main aims of the policy/service/function being screened.</p> <p>Please state if this policy/service is rigidly constrained by statutory obligations</p>	<p>The policy and procedure explain the mechanism whereby reports of types of wrongdoing can be reported to the Council under the Public Interest Disclosure Act.</p> <p>As above, statute applies to the underlying protections, but the detail of the policy is not constrained by statute</p>				
Question	Answer				
<p>1. Is there any reason to believe that the policy/service/function could have a specific impact on people from one or more of the following groups according to their different protected characteristic, for example, because they have particular needs, experiences, issues or priorities or in terms of ability to access the service?</p> <p>Please tick the relevant box for each group.</p> <p>NB. Equality neutral means no negative impact on any group.</p>		Positive	Negative	Neutral	Unsure
	Age	X			
	Disability	X			
	Gender	X			
	Gender Re-assignment	X			
	Marriage/civil partnership	X			
	Pregnancy & maternity	X			
	Race	X			
	Religion or belief	X			
	Sexual orientation	X			
Other (eg low income)	X				

Question	Answer	Comments
2. Is the proposed policy/service likely to affect relations between certain equality communities or to damage relations between the equality communities and the Council, for example because it is seen as favouring a particular community or denying opportunities to another?	No	The Policy and Procedure are not expected to have any material effect on equalities issues. To a limited extent they may assist in the achievement of equalities objectives by facilitate reporting of any equalities breaches. No negative impact is foreseen.
3. Could this policy/service be perceived as impacting on communities differently?	No	See above
4. Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?	No	See above
5. Are any impacts identified above minor and if so, can these be eliminated or reduced by minor actions? If yes, please agree actions with a member of the Corporate Equalities Working Group and list agreed actions in the comments section	No	<p data-bbox="914 741 1457 891">Actions:</p> <p data-bbox="914 909 1457 1003">Actions agreed by EWG member:</p>
<p data-bbox="153 1025 1390 1093">If 'yes' to questions 2 - 4 a full impact assessment will be required unless comments are provided to explain why this is not felt necessary:</p> <p data-bbox="153 1290 1219 1323">Decision agreed by EWG member:</p>		
<p data-bbox="153 1350 536 1384">Assessment completed by:</p> <p data-bbox="153 1406 236 1440">Name</p>	<p data-bbox="745 1406 963 1440">James Arrandale</p>	
<p data-bbox="153 1473 268 1507">Job title</p>	<p data-bbox="745 1473 1342 1507">Principal Solicitor & Deputy Monitoring Officer</p>	
<p data-bbox="153 1552 220 1585">Date</p>	<p data-bbox="745 1552 876 1585">Dec 2023</p>	



Whistleblowing Policy

Adopted [DATE]

Owner				
Responsible Person <i>(non-substantive updating)</i>				
Review Cycle <i>(1 to 5 years)</i>			Next Review Date	
Last Impact Assessment (IA) Date			Next IA Date	
Date initially approved by Cabinet				
Published to <i>(internal, external or both)</i>				
Stakeholders consulted? <i>(Please tick to confirm)</i>		Yes	No	
Revision Record				
Rev. No.	Date of Issue	Reason for Revision		

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1. Executive Summary

- 1.1 This Policy sets out the Council's approach to ensuring that issues of significant concern (such as fraud, malpractice and illegality) can be brought to its attention in the public interest. It also explains in summary terms the legal protections that it will ensure for whistleblowers.
- 1.2 The Council maintains a separate whistleblowing procedure for staff and members which sets out in operational terms how reporting will be managed.

2. Introduction

What is Whistleblowing?

- 2.1 Whistleblowing is the raising of a significant concern, and anyone who does so is a "whistleblower" for the purposes of this Policy. The concern does not have to be proved accurate, but the whistleblower must have genuine suspicions.
- 2.2 Significant concerns cover many issues. Examples include (**NB** this is not an exhaustive list):
 - A criminal offence which may have been, or seems likely to be, committed;
 - Breach or disregard for legislation, particularly relating to health & safety;
 - Suspected fraud;
 - Malpractice or ill treatment of a client/customer;
 - Breach of Standing Orders, Policies or Codes of Conduct;
 - Showing undue favour over a contractual matter or to a job applicant;
 - Concealing information on any of the above.
- 2.3 In all cases, whistleblowers should make a report if it would be in the **public interest** for the conduct to be corrected and, if appropriate, sanctions applied.

Background to this Policy

- 2.4 People working for and with the Council, and its elected Members, are often the first to realise that there may be something seriously wrong within the Council or the services that it commissions. However, they may not express concerns because they feel that speaking up would be disloyal to their colleagues or to the Council. Employees may also fear harassment or victimisation.
- 2.5 The Council is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, we encourage all

employees, Members, and contractors and those we work in partnership with to come forward and voice concerns about any aspect of the Council's work. We emphasise that employees can do so without fear of reprisals. The earlier concerns are raised, the easier it is to take action and deal with the matter.

- 2.6 This policy supports the Council's Anti-Fraud and Anti-Corruption Policy. It is intended to encourage and enable individuals to raise concerns within the Council directly, rather than overlooking a problem or reporting the matter externally. Similarly, anyone else who has a genuine concern about the conduct of an employee is encouraged to report their concerns.

3. Aims, Objectives and Scope of this Policy

3.1 This Policy:

- Sets out how the Council will address whistleblowing reports;
- Encourages individuals to feel confident in acting as a whistleblower;
- Provides reassurance that anyone who raises an issue will be protected from reprisals or victimisation where they reasonably believe in good faith that they are raising serious concerns.
- Explains how matters can be taken further if the whistleblower is not satisfied with the response;

3.2 The Policy is supported by a Whistleblowing Procedure.

Who should use this Policy

3.3 This Policy is for use by Members and employees, (including temporary or agency staff).

3.4 It is also available for use by:

- Contractors;
- Partners;
- Suppliers; and
- Voluntary organisations who the Council has dealings with,

provided that their whistleblowing concern relates to a service that their organisation is providing to the Council. The Council cannot deal with reports that arise out of unrelated aspects of their organisation's operations.

Other Channels to address Issues Arising

- 3.5 This Policy does not replace the Corporate Complaints Policy, the Harassment at Work Procedure, Grievance Procedure or the Disciplinary Procedure, nor is it concerned with complaints about the conduct of Councillors. Matters that fall within those policies and procedures will be dealt with under them.
- 3.6 Issues relating to safeguarding should be raised in accordance with the Council's Safeguarding Policy.
- 3.7 Suspected fraud relating to Council Tax Support, Council Tax and Business Rates exemptions and discounts can be reported via the following channels:
- Contacting the Council's Customer Information Centre (01553 616200)
 - By email to benefit.fraud@west-norfolk.gov.uk
 - Online via the Borough Council's [website](#)
 - Writing to Internal Audit, Borough Council of King's Lynn & West Norfolk, King's Court, Chapel Street, King's Lynn, Norfolk, PE30 1PX
- 3.8 Anyone with a concern about an employee's conduct but is unsure whether a particular practice is unacceptable to the Council is encouraged to report this, either via the Council's website (which allows for anonymous reports) or by email to whistle@west-norfolk.gov.uk.
- 3.9 A list of external agencies who may also be referred to is below.

4. Reporting of Whistleblowing Concerns

- 4.1 The Council has introduced a Procedure in consultation with UNISON, which sets out how staff, Members, and others working with the Council should report whistleblowing concerns, and the related steps they should take.

Safeguards for Whistleblowers

- 4.2 The Council's Procedure:
- ensures that **legal protections** for whistleblowers are maintained;
 - makes clear that it will not tolerate any **harassment or victimization** of staff making whistleblowing disclosures;
 - sets out how the Council will seek to preserve the **confidentiality of the whistleblower** if this is requested;
 - explains how the Council will deal with **confidential information** provided in the course of a whistleblowing report;
 - explains how the Council will deal with **untrue allegations** (made in good faith or otherwise); and

- explains how whistleblowers may **withdraw allegations**, and how the Council will deal with this.

5. How the Council will respond to Whistleblowing

- 5.1 The action taken by the Council will depend on the nature of the concern. Reports may be:
- Resolved by agreed action (e.g. training or review) without the need for investigation;
 - Referred for handling under another policy;
 - Investigated internally;
 - Referred to an external investigating agency such as the Police; or
 - Referred to the external auditor.
- 5.2 The Council may determine to submit an allegation or other related matters of concern for investigation, even where the whistleblower withdraws their involvement. (For example, a withdrawn allegation that a client in a residential home has been the victim of theft may suggest wider safeguarding issues which still require investigation.) Such further investigation may be carried out in accordance with any other relevant policy or procedure.

6. Responsible Officer for Whistleblowing Policy

- 6.1 The Monitoring Officer has overall responsibility for the maintenance and operation of this policy and will liaise with the Senior Leadership Team and the Senior Internal Auditor as necessary.

7. Responsibility for and Monitoring of the Whistleblowing Policy

- 7.1 The Monitoring Officer will provide an annual report to the Audit Committee on the handling of whistleblowing reports received in the preceding year, in a form that does not compromise confidentiality.
- 7.2 Personnel shall be responsible for making staff aware of the Policy's requirements through training and publicising initiatives.
- 7.3 The Head of Audit shall be responsible for reviewing - in consultation with the Monitoring Officer - the effectiveness of this policy and the whistleblowing procedure on at least a two-yearly basis. Review of the procedure will not require re-endorsement of the policy. The relevant trade unions will be consulted on any material amendments to the procedure.

8. The Law

8.1 This policy has been written to take account of relevant Employment law (the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998). The law provides protection for an employee against any retaliation by their employer as a result of reporting a concern, if the employee has a reasonable belief that it is in the public interest to do so (known as the “public interest test”). This is known as making a “protected disclosure”.

8.2 A “protected disclosure” is one which alleges:

- that a criminal offence has been, is being or is likely to be committed;
- that a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject;
- that a miscarriage of justice has occurred, is occurring or is likely to occur,
- that the health or safety of any individual has been, is being or is likely to be endangered;
- that the environment has been, is being or is likely to be damaged; or
- that information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

8.3 Whistleblowers who are either not employees of the Council or elected Members, are not directly subject to these legal protections (because the Council is not their employer so does not have the same employment duties to them). However, it is good practice for the Council to make available the same reporting routes so that it can be made aware of public interest matters that may affect it.

8.4 Financial issues are covered by Section 151 Local Government Act 1972, Section 114 of the Local Government Finance Act 1988, The Local Government and Housing Act 1989, and Accounts and Audit Regulations 2003 (as amended).

9. Training and Promotion of Whistleblowing Awareness

9.1 The Council shall institute whistleblowing training as part of staff and member induction, and it will make available periodic “top-up” training on an ongoing basis.

9.2 Awareness-raising initiatives will be promoted for external contractors and partners.

10. Additional information, guidance, and resources

Protect (formerly Public Concern at Work)

Protect give confidential, free and independent advice – including legal advice - on how to proceed. <https://protect-advice.org.uk>

Local Citizen’s Advice Bureau

For general advice and information on a range of legal fields: www.citizensadvice.org.uk

Advisory, Conciliation and Arbitration Service (ACAS)

For advice on relationship issues in the workplace: www.acas.org.uk

Trade union representative or the relevant regulator or professional body

As applicable

11. Health implications

None.

12. Environmental implications

None.

13. Equality, Diversity and Inclusion

This procedure has been reviewed in line with the Equality Act 2010 which recognises the following categories of individual as Protected Characteristics: Age, Gender Reassignment., Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion and Belief, Sex (gender), Sexual Orientation and Disability.

We will continue to monitor this procedure to ensure that it allows equal access and does not discriminate against any individual or group of people.

A copy of the EqIA can be found here: [\[Link to be inserted\]](#)

14. Associated Documents

- 14.1 Corporate Complaints Policy
- 14.2 Harassment at Work Procedure
- 14.3 Grievance Procedure
- 14.4 Disciplinary Procedure
- 14.5 Councillors' Code of Conduct
- 14.6 Safeguarding Policy

WHISTLEBLOWING PROCEDURE

This Procedure should be read together with the Council's Whistleblowing Policy [\[link\]](#).

Split out Sections with Hyperlinked Index

1. Principles

- 1.1 The law protects employees who seek to uphold the public interest by flagging issues of concern within the Council.
- 1.2 The Council treats all reports it receives seriously. We encourage individuals to feel confident in raising any genuine concerns.
- 1.3 This Procedure explains:
 - how employees, elected Councillors and those working with the Council should report any concerns; and
 - how line managers and the Council will deal with whistleblowing reports.

What is Whistleblowing?

- 1.4 Whistleblowing is the raising of a significant concern. The concern does not have to be proved accurate by the whistleblower, but must be genuinely suspected.
- 1.5 Significant concerns may cover many issues. Examples may include (**NB** this is not an exhaustive list):
 - A criminal offence may have been, or seems likely to be, committed;
 - Breach or disregard for legislation, particularly relating to health & safety;
 - Suspected fraud;
 - Malpractice or ill treatment of a client/customer;
 - Breach of Standing Orders, Policies or Codes of Conduct;
 - Showing undue favour over a contractual matter or to a job applicant;
 - Concealing information on any of the above.
- 1.6 In all cases, whistleblowers should make a report if they think it would be in the **public interest** for the conduct to be corrected and (if appropriate) sanctions applied.

The basic structure of reporting

- 1.7 The Council has appointed three Whistleblowing Reporting Officers (**WROs**), who are the Monitoring Officer, Senior Internal Auditor and the Assistant Director, Central Services. The WROs' role is:
- To be the primary point of liaison for whistleblowers;
 - To triage whistleblowing reports (i.e. whether the complaint is more properly a grievance/other issue);
 - To determine how whistleblowing reports should be addressed – whether via internal or external investigation and whether preliminary fact-finding is required; and
 - To allocate responsibility for the conduct of investigations and ensure that these investigations are concluded.
- 1.8 As set out below, there are a range of available ways for you to report concerns either in person or in writing.
- 1.9 The Monitoring Officer has overall responsibility for the Whistleblowing Policy and this Procedure, and will liaise with members of the Senior Management Team as necessary.

2. What you should do as a Whistleblower

- 2.1 As soon as you reasonably believe you have a serious concern, **you should** report it using one of the following methods:
- To your line manager directly, either in writing or verbally;
 - To a WRO directly, either in writing or verbally;
 - Via the online form [\[link\]](#); or
 - Via email to whistle@west-norfolk.gov.uk.

Both the email address and online form submissions are monitored by the WROs.

If you feel that none of these routes are appropriate, see paragraphs [\[2.7-2.15\]](#) below.

- 2.2 If possible, please raise your concerns in writing, to ensure those conducting investigations properly understand and investigate the allegations. Written allegations should as far as possible include the background, history and nature of the concern (including names, dates and locations if known) and the reason why you are concerned about the situation.

- 2.3 If it is not possible to provide a written summary above, you can raise your concern either by telephone or by meeting the appropriate officer as set out in Section **XX**.
- 2.4 You should make clear at the outset whether you would prefer your identity to be kept confidential. See the “**Confidentiality of your identity**” section of this procedure [\[link\]](#).
- 2.5 Where you have a genuine concern, you should **not**:
- Do nothing;
 - Be afraid to raise the concerns – you will not suffer any recriminations from the Council as a result of raising a legitimate concern;
 - Directly approach or accuse individuals you have concerns about;
 - Try to investigate the matter yourself. There are special rules surrounding the gathering of evidence for use in criminal cases. Any attempt to gather evidence by anyone not familiar with these rules could destroy the case;
 - Convey your concerns to anyone not in the list above (there is a duty to maintain the confidentiality of the matter under investigation).
 - **NB** an employee may invite a trade union representative or work colleague to report the matter on their behalf.
 - **Members** may wish to consult their party Leader before raising the matter, but again should do so in general terms so as to maintain the confidentiality of the matter under investigation.
- 2.6 The earlier a concern is raised, the easier it is for the Council to take action.

Reports concerning Senior Staff

- 2.7 Any concerns which relate to the **Chief Executive** should be raised with the Leader of the Council (or if unavailable, the Deputy Leader).
- 2.8 Any concerns which relate to a **WRO** may either be raised with the other WROs, or with the Chief Executive.

Whistleblowing outside the Council – “Prescribed Persons”

- 2.9 The Policy and this procedure are intended to provide an avenue to raise concerns within the Council. However, if you feel that this is not appropriate, there is a list of “**Prescribed Persons**” who may accept a whistleblowing report. These are mainly regulatory bodies, for example the Care Quality Commission, OFSTED, Health and Safety Executive, Charity Commission, but also include the Council’s external auditors, who can be contacted as follows:

Ernst & Young Details.

The current list of Prescribed Persons can be found on the gov.uk website (search under “whistleblowing”).

- 2.10 If you choose to take this route, we strongly advise that a disclosure should only be made if it is reasonably believed that the information provided is “substantially true” – this means that more evidence will need to be provided to back up the case than for an internal disclosure. If there is any doubt about which route to take, it is recommended that the Prescribed Person be contacted first for advice (without initially naming the employer or providing specific details) or speak to a professional Trade Union Association.

Whistleblowing outside the Council – Other External Agencies

- 2.11 There may be circumstances in which an external disclosure could be made to another person or organisation, for example the Police, a union official, an MP or the media. It will rarely be appropriate to alert the media in the first instance.

- 2.12 The law is complex for this type of disclosure. In order for a report to be a “protected disclosure”, the following conditions **must all** be met:

- The individual reasonably believes that the allegation is substantially true;
- The disclosure is not being made for purposes of personal gain; AND
- It is reasonable (see below) in the circumstances for the disclosure to be made to someone other than the Council or a prescribed person.

In addition, **one** of the following three conditions **must also** apply:

- There is a reasonable belief of victimisation if the matter is raised internally;
 - There is a reasonable belief that there is likely to be a cover-up if the matter is raised internally; or
 - The matter has already been raised internally or with a Prescribed Person
- 2.13 What makes an external disclosure “reasonable” includes things like the seriousness of the allegation, the likelihood of the risk or damage continuing in the future and the action taken by the Council or a Prescribed Person if they have already disclosed the matter to them. If a disclosure has already been made to the Council or a Prescribed Person, any action already taken should be known before considering taking the matter further.
- 2.14 We strongly encourage you to seek advice before reporting a concern to anyone external.
- 2.15 Disclosure will not be protected if an offence has been committed in making it.

3. Line Managers' role

3.1 Line Managers must create an open and fair culture within their area of responsibility and ensure that employee concerns are listened to, and action taken where necessary. They are responsible for ensuring that there is a safe environment for employees to raise concerns and that there is no retribution as a result of doing so.

3.2 Many reports from staff will be matters which are appropriate to resolve within the team. However, **you must escalate the report** where it appears to concern, or may concern:

- Any criminal offence, particularly fraud or corruption
- a miscarriage of justice
- A failure to comply with a legal obligation
- The endangering of an individual's health and safety
- Unnecessary damage to the environment (for example, by pollution)
- Deliberate concealment of information relating to any of the above

3.3 Reports must be escalated in writing.

3.4 You **must not**:

- Approach or accuse any individuals directly.
- Escalate to anyone other than those indicated in **section 2** above.
- Try to investigate the matter yourself. Investigations by employees who are unfamiliar with the requirements of evidence are highly likely to jeopardise a successful outcome. They may also alert the suspect and result in the destruction of evidence.

4. Role of Whistleblowing Reporting Officers

4.1 The WRO's shall:

- If the whistleblower is an employee, reassure them that they will not suffer retribution by raising reasonably held suspicions.
- Take early action if they consider this is necessary (subject to the rest of this procedure). Delay may cause the Council to suffer further financial loss or make further enquiry more difficult.
- Get as much information as possible from the whistleblower and encourage them to provide a written statement and/or copies of any notes they have already taken.

- Request documentary evidence which may exist to support the allegations made, but do not interfere with this evidence in any way.
- Ask the whistleblower to declare any personal interest in the concern raised.
- Produce a written record of the whistleblower's concerns, which should include:
 - Details of the job and areas of responsibility of the individuals implicated;
 - Background details and nature of the concerns (including relevant names, dates and locations);
 - Why the person raising the matter is concerned; and
 - Action taken to date, if any.
- Carry out an Initial Review [[link to below section](#)], in which they shall:
 - Determine what if any further steps shall be taken.
 - Be objective when evaluating the issue, and consider the facts as they appear based on information to hand.
 - Take care to ensure that any suspect(s) are not alerted to the potential investigation, and the confidentiality of the whistleblower is maintained as far as possible.
- Oversee the steps to be taken following the Initial Review; and
- Provide information to the whistleblower as appropriate during and at the conclusion of any further steps.

5. Initial Review

- 5.1 As soon as possible after a concern is reported, the WRO's shall carry out an initial review of the whistleblowing report and decide together on the appropriate action, depending on the nature and the facts of the report. The WRO's may where appropriate discuss the matter with other officers.
- 5.2 The WROs shall consider whether any urgent action is required to protect the interests of the Council or the public.
- 5.3 The Initial Review may conclude that the report should be:
- Resolved by agreed action (e.g. training or review) without the need for investigation;
 - Referred for handling under another policy;

- Investigated internally;
 - Referred to the police or another external investigating agency; or
 - Referred to the external auditor.
- 5.4 Within ten working days of the concern being raised, the WRO's shall inform the whistleblower in writing of the outcome of the Initial Review:
- To the extent appropriate, the whistleblower shall be given details of any further investigation.
 - The individual will also be told if the Council wishes to contact them again to obtain further information.
- 5.5 If the Council does want to speak to the individual again, it will look to minimise any difficulties that may arise. The individual will be given the opportunity to meet off-site and to be accompanied by a trade union or professional representative. The Council will also ensure that the individual receives appropriate support and guidance if they agree to give evidence in criminal or disciplinary proceedings.

6. Investigation

- 6.1 Any investigation will be mindful that, in order to initiate disciplinary/criminal proceedings against suspected financial misconduct, evidence must be secured in a legally admissible form.
- 6.2 The information provided in some whistleblowing reports may indicate the need for the Council to investigate other related matters of concern. For example, an allegation that a client in a residential home has been the victim of theft may suggest wider safeguarding issues. Any investigation into these other matters will be carried out separately in accordance with the relevant policy or procedure. In these cases, no action will be taken that compromises the confidentiality of the original whistleblower.
- 6.3 If an investigation is required, and unless it is inappropriate to do so, the WRO's will write to the whistleblower:
- Giving an estimate of how long it will take; and
 - Advising them that the investigation will be carried out in the strictest confidence.
- 6.4 The WRO's will consider in each case whether the circumstances make it more appropriate for an external rather than internal investigation to be conducted. It is not realistic to fix the criteria for this decision; however, in broad terms, matters which seriously implicate senior management or which involve significant Council business are more likely to be referred to external investigation.

Internal Investigation

- 6.5 The WRO's shall discuss and appoint a lead officer for each Investigation (whether internal or external). This will normally be the Senior Internal Auditor or the Assistant Director of the department involved. However, it may be appropriate to appoint as lead officer either:
- 6.5.1 the AD of another department, in the interests of independence; or
 - 6.5.2 a more junior officer under delegated authority.
- 6.6 The internal investigation may include interviewing or observing suspects in connection with the concerns raised. This is to ensure that evidence is collected in a way that complies with relevant legislation and does not compromise the investigation and/or subsequent disciplinary procedures/prosecutions.
- 6.7 The WRO's will consider whether an initial covert investigation might be appropriate required, for example:
- To minimize the risk that evidence is hidden or removed; or
 - To avoid wrongly damaging the reputation of anyone suspected but subsequently found innocent of wrongful conduct.

External Investigation

- 6.8 The WRO's shall appoint a lead officer within the Council with responsibility for managing the external investigation.
- 6.9 Notification to Chief Exec/others of decision to investigate?

7. Final Report

- 7.1 Once the process of Initial Review and Investigation (if any) is complete, and subject to any legal or other constraints that may arise, the Council will provide the individual with a summary of the outcome. Whistleblowers should be aware that in most cases it will not be appropriate to provide a detailed explanation.
- 7.2 Where the matter relates to fraud, an internal report shall be produced [for whose review? Dept and Mgmt Team?] setting out a description of the systems, controls and procedures that should be operating within the area where the fraud is alleged to be taking place.

8. Your Safeguards as a Whistleblower

"Protected Disclosures"

- 8.1 Employment law (the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998) provides protection for an employee against harm or damage caused to them as a result of reporting a concern to their employer. This is known as making a "protected disclosure". For example, it is unfair for an

employer to dismiss you or select you for redundancy on the grounds that you have made a protected disclosure.

- 8.2 Under the legislation, a disclosure is protected if the person making it has a reasonable belief that it is in the public interest to do so (known as the “public interest test”).
- 8.3 It is important to note that this protection only applies to the areas and situations set out in this procedure. If there is any uncertainty whether the matter is covered, independent advice can be sought. Key contacts have been included in the Whistleblowing Policy.

Harassment and Victimisation

- 8.4 The Council recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. The Council will not tolerate harassment or victimisation (including informal pressures) and will take action to protect employees when they raise a concern in good faith. The Council will treat any claims of harassment or victimisation seriously and will investigate the complaint in accordance with the Council’s Harassment Procedure at Work, which could lead to disciplinary proceedings.
- 8.5 This does not mean that if, where an employee is already the subject of disciplinary or redundancy procedures, those procedures will be halted as a result of their whistleblowing.

Confidentiality of your identity

- 8.6 The Council will do its best to protect a whistleblower's identity when they raise a concern and ask for their name not to be disclosed. Whistleblowers must be aware, however, that the fact that enquiries are being made might result in their identity becoming known, and the Council does not guarantee that confidentiality can be maintained in all cases.
- 8.7 Where information needs to be shared with officers to progress an investigation, the Council will seek to protect the whistleblower’s confidentiality to the extent possible.
- 8.8 If your identity may be compromised through investigation, or if it has to be made known (for example, in the course of evidence in court), the Council will attempt to contact you in advance to discuss how you want to proceed. It will also try to make suitable protective arrangements as appropriate and feasible (for example changing line management structures).
- 8.9 In particular, it may be necessary to breach confidentiality **without** any prior consultation where the allegation is so serious that the Council has to take immediate action to prevent anyone coming to any harm, and where it is necessary to reveal the nature and source of the complaint. These will be extreme and unusual cases, however, and the Council will endeavour to notify you in advance even in these cases.

How the Council handles Anonymous Allegations

8.10 We encourage whistleblowers to put their name to their allegation whenever possible. Concerns expressed anonymously will be considered by the Council, but they are much less powerful and the Council will exercise discretion as to whether to further investigate them, taking into account:

- the seriousness of the issues raised;
- the credibility of the concern; and
- the likelihood of being able to independently confirm the allegation.

Withdrawing your allegation

8.11 You have the right to withdraw any allegation previously made under this procedure. Depending on circumstances, the Council may request an explanation for this change of decision.

8.12 As set out above, however, the Council may continue to investigate the allegation notwithstanding your withdrawal, if it determines that serious issues are raised.

Disclosure of Confidential Information

8.13 Individuals can make a protected disclosure using information that the employer classifies as confidential. It is important to note, however, that the procedures in this Policy should be followed to avoid the risk of disciplinary action.

8.14 If a disclosure includes information that a third party has provided to the Council in confidence, that disclosure may not be protected to the extent that it causes the third-party unjustifiable damage or breaches their rights.

Untrue Allegations

8.15 Whistleblowers are not expected to prove the truth of an allegation, and if an employee or Member makes an allegation in good faith, but it is not confirmed by the investigation, the Council will not take action against them.

8.16 However, if an allegation is found to be malicious, frivolous or vexatious, or intended to give personal gain to the whistleblower as a result of the allegation, disciplinary action may be taken against them. If such an allegation is made by a Member, the Standards Committee may investigate the matter.

9. Management of the Whistleblowing process

9.1 The current detailed arrangements are set out at Appendix 1 to this procedure.

Appendix 1

For the purposes of reporting, there shall be the following arrangements:

- i. There will be a dedicated whistleblowing page on the Council's public-facing website, in which the Whistleblowing Policy is set out in user-friendly terms.
- ii. The Whistleblowing page will contain an online Whistleblowing Form, in which the individual can enter:
 - their name and contact details (or refuse if wishing to be anonymous),
 - details of any representative,
 - details of the concern,
 - request for anonymity/confidentiality,
 - an upload facility to submit photos/documents.
- iii. The whistleblowing form and the policy will signpost that the report can instead be directed to the WRO's directly, or to others where a WRO is implicated.
- iv. In addition, there will be a dedicated mailbox, whistle@west-norfolk.gov.uk. Forms completed via the online page will be forwarded to this mailbox.
- v. A member of the Legal team will be assigned the following functions:
 - circulating reports/emails received to all three WRO's;
 - informing the whistleblower that their email has been received;
 - giving a reference code to each report which can be used for future emails and matter tracking.
 - maintaining a database containing all emails and documents relating to all whistleblowing reports.
 - Monitoring to ensure that reports are progressed and concluded promptly, following up regularly with WRO's or assigned officers.

REPORT TO CABINET

Open		Would any decisions proposed :			
Any especially affected Wards South Lynn	Discretionary	Be entirely within Cabinet's powers to decide		NO (part)	
		Need to be recommendations to Council		YES (part)	
		Is it a Key Decision		NO	
Lead Member: Cllr Baljinder Anota and Cllr Michael de Whalley E-mail: cllr.Baljinder.Anota@West-Norfolk.gov.uk cllr.michael.dewhalley@west-norfolk.gov.uk		Other Cabinet Members consulted: Cllr Parish and Cllr Moriarty			
Lead Officer: Ged Greaves and Matthew Henry E-mail: Ged.Greaves@West-Norfolk.gov.uk matthew.henry@West-Norfolk.gov.uk Direct Dial:		Other Members consulted: Cllr Joyce, Cllr Kemp, Cllr Heneghan, Cllr Bone			
Other Officers consulted: Lorraine Gore, Stuart Ashworth and James Arrandale					
Financial Implications YES	Policy/ Personnel Implications YES/NO	Statutory Implications YES	Equal Impact Assessment YES If YES: Pre-screening	Risk Management Implications NO	Environmental Considerations YES

Date of meeting: 15 January 2024

DESIGNATION OF A VILLAGE GREEN – SOUTH LYNN

Summary

This report brings forward a proposal for designation of a Village Green on land to the west of Hardings Way, South Lynn. This land is owned by the Borough Council.

The report also details proposals for the establishment of a community orchard which will form part of the Village Green and the Beuys's project on land to the north of the proposed Village Green.

Recommendations

It is recommended that Cabinet:

- 1) Agrees to proceed with the Community Orchard at Wisbech Road/ Harding's Way as detailed in the report
- 2) Agrees to enter into a form of agreement with the Harding's Pits Association which continues the current operational arrangements for the Harding's Pits Door Step Green. Authority to be delegated to the Assistant Director Property & Projects in consultation with the Portfolio Holder for Property and Corporate Services to agree appropriate terms and length of agreement
- 3) Supports the proposed Beuys's Acorns Project, potentially as part of the proposal for the Harding's Pits Door Step Green, with this area being extended to accommodate the Beuys's Project.

Cabinet recommend to Council:

- 4) To resolve that the land identified in the attached plan (the red shaded area to the west of Hardings Way) be designated as a Village Green.

Reason for Decision

To progress projects which enhance the environment and protect and increase green space for the benefit of the local community.

1. Community Orchard: Wisbech Road/Harding's Way

- 1.1 The Council owns a site between Harding's Way and Winfarthing Avenue that lies adjacent to the southern boundary of the current Harding's Pits Doorstep Green. The site has an area of approximately 3,500sqm.
- 1.2 The local ward members have expressed an aspiration for this grassland to be converted to a community orchard. Cllr Kemp, South and West Lynn Ward Member, has been actively involved in discussions with the Director of Public Health about Community-led Healthy Action Plans for South Lynn. The Community Orchard has been included as part of these discussions.
- 1.3 Norfolk County Council coordinated a funding application to the Forestry Commission's Urban Tree Challenge Fund and included the proposed community orchard. The funding application has been successful.
- 1.4 The funding application is for 34 mixed fruit trees. Community involvement in the planting and ongoing maintenance will be organised with input from the East of England Apples and Orchards Project, Harding's Pits Community Association and other local groups and interested individuals. The planting would have additional benefits in terms of improving biodiversity, carbon sequestration and improvement of the area's tree canopy cover.
- 1.5 Given the site's history, and potential use, a contaminated land assessment has been commissioned with sampling undertaken on 16 October 2023. The consultant's report has confirmed that the site is suitable to be planted as an orchard.
- 1.6 A planning application may need to be submitted.
- 1.7 The Urban Tree Challenge Fund will cover approximately 80% of the costs of purchasing and planting the trees together with a sum towards 3 years of watering, weeding and maintenance. These values are based on standard costs set by the Forestry Commission. The balance of the costs can be met from the corporate climate change fund. The estimated cost of the project is £29,000 with £23,000 being funded by grant and £6,000 funded by BCKLWN.

- 1.8 Hedgerow planting along the boundaries with Harding's Way and Wisbech Road is also envisaged with planting to be undertaken with volunteers and planting packs supplied free of charge by various organisations. That would provide further benefits in terms of improving biodiversity, carbon sequestration and screening of the orchard.
- 1.9 The Council would need to consider how this proposed Community Orchard would be held, run, and managed. Again, this could possibly be included within an agreement with the Harding's Pits Door Step Green Association, and included within their agreement.
- 1.10 It is intended that the site will be included in the proposed Village Green. See attached map.

2 Harding's Pits Association: Harding's Pits Door Step Green

- 2.1 In 2004 the Council secured grant funding from the Countryside Agency, now Natural England, to develop a "Door Step Green", and in doing so covenanted not to dispose of the land benefitting from the grant monies for a period of 25 years.
- 2.2 At the same time the Council entered into a "Framework Agreement" with the "Harding's Pits Community Association" in relation to the management, maintenance and operation of the Door Step Green.
- 2.3 The Door Step Green is a large and relatively featureless open space, with sculptural points of interest within it. The design and purpose of the Door Step Green is intended to provide an area of natural vegetation and to encourage biodiversity and wildlife habitats. The area is not intended to be a manicured urban park.
- 2.4 The Doorstep Green is managed by a constituted community group, the Harding's Pits Community Association Limited. A great deal of time and effort has been invested by the voluntary, and unpaid, members of the Association to create and manage the Doorstep Green during the past years.
- 2.5 The covenant attached to the funding package expires in approximately 6 years' time, and members of the community group are concerned about the future of the Door Step Green.
- 2.6 It is understood that the Association is keen to extend any form of agreement in respect of the Door Step Green area.
- 2.7 It is intended that the site will be included in the proposed Village Green. See attached map.

3. Beuys's Acorns Project: Land immediately to the north of the Harding's Pits Door Step Green

- 3.1 We have received an interesting proposal from a local artist who wishes to promote a project that was initially devised by renowned artists Ackroyd and Harvey. Their idea was to collect acorns from the 7,000 oak trees planted in the 1980s by Joseph Beuys for Documenta, in Kassel - a large contemporary art exhibition which happens every 5 years.
- 3.2 Joseph Beuys was one of the founders of the German Green movement and planted the oak trees throughout his local town as a statement about the greening of the city. As a tribute to him and this initiative, Ackroyd and Harvey have been growing their oaks as a miniature forest in air-pots, and exhibiting them widely around Europe - the latest exhibit was at Tate Modern. Each time, their exhibition has been accompanied by talks or conferences, or workshop activity programmes aimed at greater environmental awareness.
- 3.3 The trees grown from these original acorns are becoming increasingly mature and need to be planted in the ground permanently. The artists are offering groups of 7 trees to be planted in chosen locations, and Harding's Pits area has been identified as a potential location.
- 3.4 The idea is for the planting scheme to become a symbol not only for the greening of the town, but also to promote care for the environment in general. The proposal also suggests that there should be a programme of environmental activity connected with them on an annual, or periodic basis, this could fit well with the development of the Council's cultural events/activity programme.
- 3.5 The local artist has been working with the King's Lynn Civic Society and has recently met with the Council's arboricultural officer to discuss the potential of siting the trees at Harding's Pits, as part of a wider planting scheme.
- 3.6 The artists have also engaged with the local Whitefriars school, and they are keen to be involved as tree champions/guardians.
- 3.7 The site identified by the artists is the area of land immediately to the north of the Harding's Pits Door Step Green area.
- 3.8 It should be noted that this project proposal is also seeking funding to help with the set up of the tree installation, and it may be that the organization/artists will be looking to the Council to contribute. It is understood that initially this could be less than £1,000, however the on-going maintenance and management needs to be considered.
- 3.9 The proposed Beuys's Acorns Project could tie-in neatly with future arrangements for the Harding's Pits Door Step Green, with the

association taking on management and maintenance of the proposed planting, as part of their existing programme.

- 3.10 The Council could consider granting the Door Step Green Association a long form of agreement with the area extended, to include the land to the north, up to the confluence of the River Nar and the River Great Ouse.
- 3.11 At this time this area is ineligible for registration as Village Green. Section 4 below provides further details.

4. Village Green Designation

4.1 A town or village green is land that is protected from encroachment and development, in the interests of use by the local community. Unlike common land, there is no general right of public access over a village green: instead it is reserved for use by local residents.

4.2 Essential character of a village green - Protected status

4.2.1 Village greens are protected in perpetuity unless deregistered (see below), and the local community (see below) have a legal right to use the land for lawful sports and pastimes.

4.2.2 Town and village greens are protected by legislation. A person may be convicted in the Magistrates' Court and fined if they:

- encroach on, or enclose, a town or village green;
- erect anything on it; or
- disturb or interfere with it, otherwise than for its better enjoyment for its proper purpose.

4.2.3 The Local Authority can also make byelaws to protect town and village greens.

4.2.4 Works may only be allowed on the green if they are for the better enjoyment of the green, and only with the landowner's prior consent.

4.2.5 The protected status of the village green is distinct from its ownership. The land that is the green may be privately owned. If sold the land retains its protection as a village green.

4.3 Registering a Village Green

4.3.1 Anyone can apply under section 15(1) of the Commons Act 2006 to register land as a village green. Applications are made to the Commons Registration Authority - for King's Lynn, this is Norfolk County Council (NCC).

4.3.2 In cases where the applicant is the owner of the land, it only needs to demonstrate ownership. Unlike non-owners, it does not need to

demonstrate that the land has been used consistently as a green (see below).

4.3.3 There are statutory prohibitions on the registration of certain land as village green, importantly in cases where the land is earmarked for development in a local plan. See “Planning Considerations” below.

4.4 Registration Process

4.4.1 A landowner wishing to register its own land as a village green must make an application to NCC. The application must:

- include a map and description of the land, and
- identify the area where the local people who use the land live (because only those people will have a right to use the green for recreation).

4.4.2 The applicant landowner will also need to confirm in a statutory declaration that it is the owner of the land and has obtained any necessary consents.

4.4.3 Where there is a lease or charge on the land, the applicant will first need to consult any lease or charge holder to inform them that it intends to apply for registration. Written consent must be provided.

4.4.4 Once NCC is satisfied that the land is eligible (see below) and the applicant is legally entitled to apply to register the land, it should grant the land village green status - there is no need for it to examine any other merits of the request. An application cannot be rejected, but the authority can ask for further evidence of ownership.

4.4.5 For completeness, applicants for village green status commonly are not the landowner. Non-landowners must demonstrate that the land has been used by a significant number of local people for lawful “sports and pastimes” for at least 20 years “as of right”:

- “*sports and pastimes*” include organised or ad-hoc games, picnics, fetes and similar activities;
- “*as of right*” means that the land has been used without asking permission, without entering by force and not in secret.

4.5 Permission to carry out works on a town/village green

4.5.1 No special application is required for works as long as they do not contravene the “better enjoyment” requirement. However, other consents may still be required, e.g. planning permission.

4.5.2 However, it is a criminal offence to undertake any works that do contravene the “better enjoyment” requirement. Depending on circumstances, they may be dealt with as a public nuisance.

4.6 De-registering a town/village green

4.6.1 Under section 16 of the Commons Act 2006, the owner of a green may apply to the Secretary of State for land to be de-registered. If successful, such an application would result in the land no longer being subject to protection as a green.

4.6.2 If the 'release land' is more than 200 square metres in area, an application must be made to register 'replacement land' as a green in its place. (If the release land is smaller than 200 square metres, a proposal for replacement land does not formally need to be included, but DEFRA policy has been to avoid net loss of town and village greens, so it is generally expected that land will be offered in exchange.)

4.6.3 The Secretary of State will take into account the interests of the benefiting local population and the neighbourhood and the wider public interest in nature conservation, public access to green space and other relevant matters.

4.6.4 A non-refundable fee of £4,900 is currently payable for all applications under section 16 to deregister/exchange a village green.

4.7 Who is responsible for maintenance?

4.7.1 Greens in local authority ownership are often managed by the authority under the Open Spaces Act 1906 or by a scheme of regulation under the Commons Act 1899. Where the green is managed by the district Council under the 1899 Act, that Council is under a duty to maintain it.

4.8 Tree planting

4.8.1 If the trees affect use of the green by local people for lawful sports and pastimes this would be a breach. Limited tree planting may therefore be acceptable, but not over the whole of the area as that would interfere with local people's use of the green.

4.9 Community enjoyment

4.9.1 The owner's consent must be sought before any work is done on a village green. An offence under the legislation is only committed where the encroachment or activity is made "*otherwise than with a view to the better enjoyment of the green*". In general the provision of facilities to assist in the enjoyment of recreation such as goal posts, children's playground, seats etc, would not be a breach of legislation.

4.9.2 *Commercial enterprises* - It may be possible in limited circumstances for commercial enterprises to take place on a village/town green if they do not interfere with the rights of local people to use the land for lawful sports and pastimes. This could include football/cricket/golf, clubs or festivals.

4.10 Ineligibility of development land for registration as Village Green

4.10.1 The Land immediately to the north of the Harding’s Pits Door Step Green site currently forms part of a housing allocation (allocation E1.10) in the adopted (2016) Site Allocations and Development Management Policies Plan (SADMPP), which forms part of the Local Plan currently used for planning decisions.



4.10.2 The Commons Act 2006 provides that land will not be eligible for registration as a village green if certain “trigger events” have taken place. **NB** the land can revert to being eligible if a subsequent “terminating event” takes place. The relevant events in this case are:

Trigger Event	Terminating Event
A development plan document (DPD) which identifies the land for potential development is adopted	The DPD is revoked. OR A relevant policy relating to the land is superseded
A draft DPD identifying the land for potential development is published for consultation	The DPD is withdrawn. OR Two years elapse post-consultation

- 4.10.3 As a result, none of the land within the current E1.10 site is eligible to be registered as a village green (because it is within the current Local Plan which has not been revoked or superseded by policy). In addition, none of the land which is within the reduced allocation currently submitted for Examination is eligible (because it has been recently published for consultation).
- 4.10.4 For clarity, it is irrelevant for the purposes of the Commons Act (as amended) that some of the land currently identified for development is under consideration to be excluded from the revised Local Plan: until the Local Plan is revised and adopted, those areas of land are not eligible as Village Green.
- 4.10.5 For further clarity, there is nothing in the Commons Act which provides that the trigger events mechanism doesn't apply equally to landowner applicants (i.e. not just to local community applicants). It would be inconsistent with the purpose of the inclusion of the trigger event mechanism for there to be such a carve-out for landowner applicants.

5 Alternative options

5.1 Local Green Space designation

- 5.1.1 The Local Green Space (**LGS**) designation is an alternative means of protecting land through the Local or Neighbourhood Plan process. However, if through the Local Plan, given the advanced stage of the current draft Local Plan, this will need to be through a future Local Plan, which will be a number of years off.
- 5.1.2 Local communities, or the local authority, can identify green spaces and request or recommend designation. If designated, the LGS will then receive protection equivalent to Green Belt, ruling out new development other than in very special circumstances.
- 5.1.3 Sites may be designated for a variety of reasons, including their setting, nature conservation benefits, or their quietness.
- 5.1.4 This option is intended to empower local communities to protect green spaces of local importance without the need to meet strict statutory criteria.

Process

- 5.1.5 LGS may be designated where those spaces are demonstrably special to the local community, whether in a village or in a neighbourhood in a town or city.
- 5.1.6 To qualify as LGS, the land must be reasonably close to the community it serves, demonstrably special to the local community, and local in character. Consideration in the local/neighbourhood plan assessment

will include whether the LGS designation would complement or undermine investment in homes, jobs and other essential services.

5.2 Fields in Trust

5.2.1 The Council has previously worked with Fields in Trust (an independent charity) to dedicate sites in the borough as open spaces in perpetuity, free from development.

5.2.2 The mechanism for achieving this is via a legally-binding Deed of Dedication between the landowner (i.e. the Council) and Fields in Trust. Under the Deed:

- (i) the Council commits to retain the land for use as green space in perpetuity (usually as a public park or playing field). The Deed will set out what can and cannot be done with the site in terms of use.
- (ii) Fields in Trust have the power to allow or prohibit any subsequent development on the dedicated land. (Generally, the only buildings that would be allowed are ancillary to the use of the site as open space or for public recreation, e.g., changing rooms for football pitches.)
- (iii) The Council continues own and manage the dedicated site/sites.

5.2.3 Entering into the Fields in Trust scheme may also enable access to grant funding sources which would not otherwise be accessible.

5.2.4 The following eligibility criteria apply:

- (i) Only freehold land, or leasehold land with at least 99 years to run, can be protected.
- (ii) Sites should normally be at least 0.2ha in size, in order to accommodate recreation. Smaller spaces may be eligible if special value to the local community can be demonstrated.
- (iii) The principal use should be outdoor recreation, sport or play. "Recreation" covers natural and semi-natural nature spaces such as woodland, local nature reserves and country parks.
- (iv) Sites can include buildings or facilities if their use is ancillary to the outdoor space.
- (v) The site must have some form of permanent public access.
- (vi) The general public must have access to at least 50% of the site for at least nine months of the year. If exclusive events/activities taking place on the site exceed that threshold then the site will not be eligible.

Further background

- 5.2.5 Fields in Trust (formerly the National Playing Fields Association) is a British charity that protects parks and green spaces and promotes the cause of accessible spaces for play, sports and recreation in British cities and towns. The charity has a role in the protection of over 2,900 parks, playing fields and nature reserves across the United Kingdom. Further details can be seen at www.fieldsintrust.org.
- 5.2.6 Fields in Trust protect land through a legally binding document known as a Deed of Dedication. The deed is a legal agreement between Fields in Trust and a space's landowner that they will retain it for use as a green space, usually a public park, playing field or recreation ground, in perpetuity. A plaque is installed somewhere on the space to let everyone who uses it know that it is protected in perpetuity.
- 5.2.7 A Deed of Dedication can be used in conjunction with other forms of protection for recreational land, such as covenants, town and village green registration and the planning process. Even if a space already has one of these on it, the Deed will strengthen the protection.
- 5.2.8 Once completed, the restriction within the Deed is registered with the Land Registry, meaning any check that is made on the land will highlight the protection that is on it and prevent disposal without the consent of Fields in Trust.
- 5.2.9 A Deed can either be charitable or non-charitable. If it is the former then both Fields in Trust and charity law will ensure the protection, whilst if it is the latter then Fields in Trust will ensure the protection.
- 5.2.10 The Deed has flexibility built into it. In general, changes to the space which are ancillary to its use - i.e. supporting the primary activities taking place. Anything which is not ancillary to a space's use, such as buildings, commercial leases and changes of use, can be permissible but generally require consent from Fields in Trust. A landowner can seek this consent by making an application through a procedure.
- 5.2.11 The Council has previously worked with Fields in Trust to dedicate open spaces across the borough in recognition of Queen Elizabeth II's Diamond Jubilee. In 2012/13 and 2015/16 the Council dedicated a number of playing fields and open spaces across the Borough as Queen Elizabeth II Fields In Trust to provide a legacy of protected recreation spaces commemorating the Diamond Jubilee. More recent work has involved the Tower Gardens, King's Lynn and the Willows Nature Reserve, Downham in 2018/19.

5.2.12 Current BCKLWN sites covered by a Deed of Dedication with Fields in Trust

2012/13

Gaywood Hall Recreation Ground
The Esplanade Gardens
Hunstanton – Lower and Upper Green
Hunstanton Community Centre
Peck's Field
Parkway
Kettlewell Lane
Lincoln Square
The Howdale
Wootton Park
The Walks
Downham Market Community Centre
Downham Market Memorial Playing Fields

2015/16

River Lane sports pitches, Lynnsport

2018/19

Tower Gardens, King's Lynn
The Willows, Downham Market

6.0 Policy Implications

- 6.1 The designation of the land shaded red on the attached map as a Village Green fits under two of the key priorities of the recently adopted Council Corporate Strategy 2023-2027: Protect our Environment and Support our Communities.
- 6.2 The current stage in the approval of the local plan means that designation of other areas of land owned by the Borough Council as Village Green cannot be progressed at this time. If there is an ambition to extend the Village Green designation further in future this will be subject to a further report to Cabinet.

7. Financial Implications

- 7.1 The Council will need to provide the estimated 20% match funding from the Council's climate change reserve of £6,000 to help facilitate the proposed Community Orchard at Wisbech Road/Harding's Way.
- 7.2 The Beuys's Acorns Project is also seeking funding to help with the set up of the tree installation, and it may be that the organisation/artists will be looking to the Council to contribute. It is understood that initially this could be less than £1,000, however the on-going maintenance and management needs to be considered.

8. Risk Management Implications

- 8.1 It is considered that the Harding's Pits site and the site proposed for the Beuys's Acorns Project have limited development potential and therefore do not represent a loss of potential capital receipts.

9. Personnel Implications

- 9.1 Limited personnel implications

10. Environmental Considerations

- 10.1 If the land is registered as a town/village green it will be subject to the same statutory protection as other town/village greens and local people will have a guaranteed legal right to indulge in sports and pastimes over it on a permanent basis. The land must be kept free from development or other encroachments. That will help protect the green and tree habitat and biodiversity present on the site and the carbon sequestration benefits.

11. Statutory Considerations

- 11.1 The Commons Act 2006 sets out the underlying framework for the creation and registration of village greens. The Commons (Registration of Town or Village Greens) (Interim Arrangements) (England) Regulations 2007 sets out the process to be followed by any applicant seeking to register a village green, and the process to be followed by the Commons Registration Authority.
- 11.2 The Open Spaces Act 1906 and the Commons Act 1899 make provision for the management of village greens, including by a scheme of regulation.
- 11.3 Offences of interfering with a village green exist under section 29 of the Commons Act 1876, together with section 12 of the Inclosure Act 1857.
- 11.4 There is extensive DEFRA guidance and materials are available on the Open Spaces Society Website.

12. Equality Impact Assessment (EIA)

- 12.1 Please see pre-screening report attached.

13. Declarations of Interest / Dispensations Granted

- 13.1 None

14. Background Papers

- 14.1 Open Spaces Society <https://www.oss.org.uk/>
<https://www.oss.org.uk/what-do-we-fight-for/village-greens/>
- 14.2 Government guidance:
<https://www.gov.uk/guidance/town-and-village-greens-how-to-register>
Section 15 of the Commons Act 2006. Guidance notes for the completion of an application for the registration of land as a town or village green outside the pioneer implementation areas. October 2013, DEFRA
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/291277/tvgprotect-faq.pdf
Commons Act 2006, Factsheet 5: Town and Village Greens,
<https://assets.publishing.service.gov.uk/media/5a7f9a0340f0b62305b88234/commonsact-factsheet5.pdf>

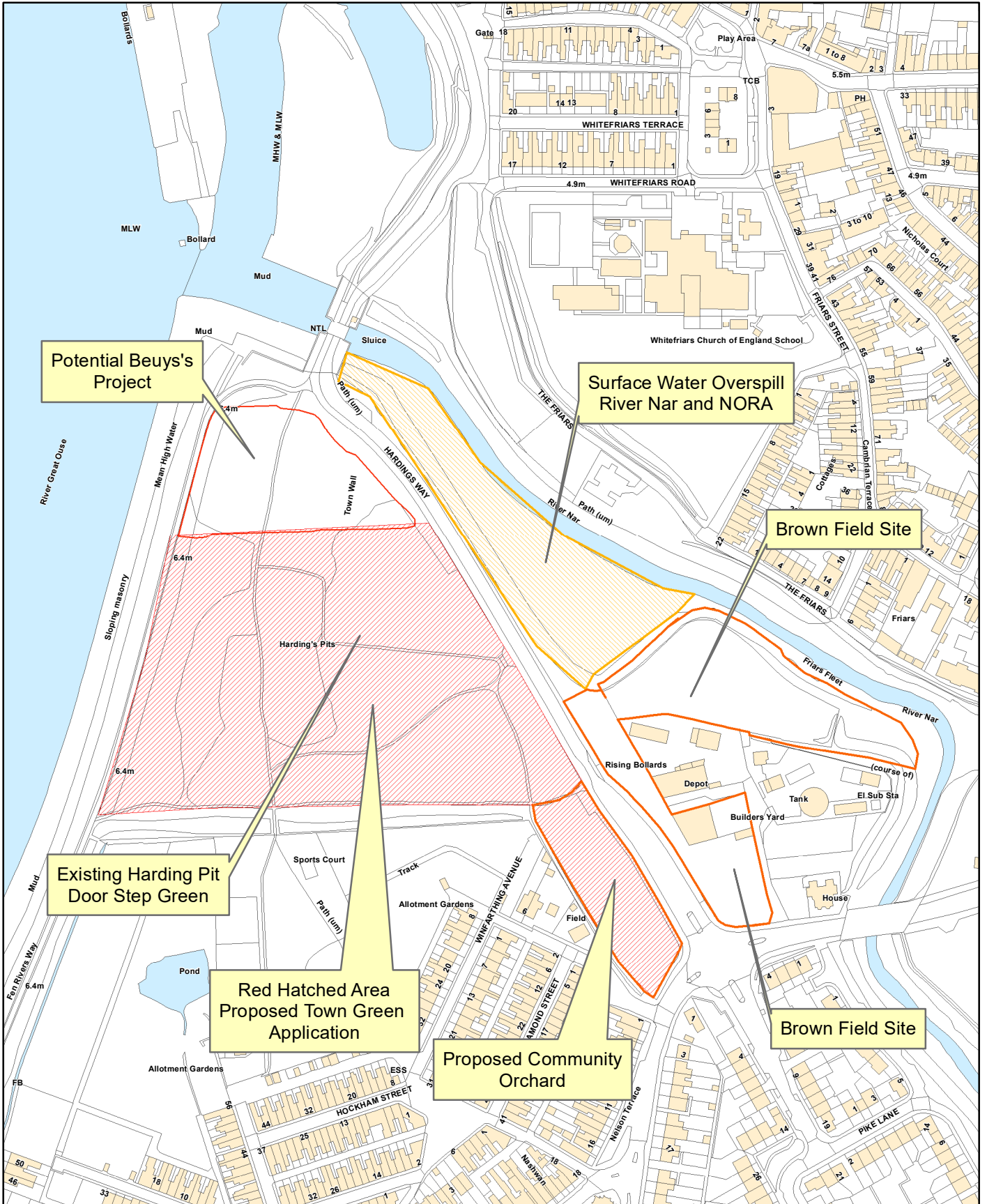
Pre-Screening Equality Impact Assessment



Borough Council of
King's Lynn & West Norfolk



Name of policy/service/function	Village Green				
Is this a new or existing policy/service/function?	New				
Brief summary/description of the main aims of the policy/service/function being screened. Please state if this policy/service is rigidly constrained by statutory obligations	Designate as a Village Green the land shaded in red on the map located to the west of Hardings Way				
Question	Answer				
<p>1. Is there any reason to believe that the policy/service/function could have a specific impact on people from one or more of the following groups according to their different protected characteristic, for example, because they have particular needs, experiences, issues or priorities or in terms of ability to access the service?</p> <p>Please tick the relevant box for each group.</p> <p>NB. Equality neutral means no negative impact on any group.</p>		Positive	Negative	Neutral	Unsure
	Age			x	
	Disability			x	
	Gender			x	
	Gender Re-assignment			x	
	Marriage/civil partnership			x	
	Pregnancy & maternity			x	
	Race			x	
	Religion or belief			x	
	Sexual orientation			x	
Other (eg low income) health and well being	x				

Question	Answer	Comments
<p>2. Is the proposed policy/service likely to affect relations between certain equality communities or to damage relations between the equality communities and the Council, for example because it is seen as favouring a particular community or denying opportunities to another?</p>	No	
<p>3. Could this policy/service be perceived as impacting on communities differently?</p>	Yes	Additional green space in South Lynn and protection of that space for the future will positively impact on the local community but will be available for all
<p>4. Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?</p>	No	
<p>5. Are any impacts identified above minor and if so, can these be eliminated or reduced by minor actions?</p> <p>If yes, please agree actions with a member of the Corporate Equalities Working Group and list agreed actions in the comments section</p>	Yes	<p>Actions:</p> <p>Additional green space in South Lynn and protection of that space for the future will positively impact on the local community but will be available for all</p> <p>Actions agreed by EWG member:</p> <p>.....</p>
<p>If 'yes' to questions 2 - 4 a full impact assessment will be required unless comments are provided to explain why this is not felt necessary:</p> <p>Decision agreed by EWG member:</p>		
<p>Assessment completed by:</p> <p>Name</p>	Lorraine Gore	
<p>Job title</p>	Chief Executive	
<p>Date</p>	6 December 2023	



 <p>Borough Council of King's Lynn & West Norfolk</p> <p>Tel. 01553 616200 - Fax. 01553 691663</p>	<p>Title</p> <p>Haarding Way/Boal Quay Potential Town Green Application</p>		<p>Scale</p> <p>1:2,800</p>
	<p>Project / Details</p> <p>Identification Purposes Only</p>		<p>Date</p> <p>06/12/2023</p>
		<p>Drawn by</p> <p>JM/Property</p>	<p>Drawing / Reference Number</p> <p>IDAREA20231116</p>

REPORT TO CABINET

Open		Would any decisions proposed :			
Any especially affected Wards	Discretionary	Be entirely within Cabinet's powers to decide		Yes	
		Need to be recommendations to Council		No	
		Is it a Key Decision		No	
Lead Member: Cllr Rust E-mail: <i>cllr.rust@west-norfolk.gov.uk</i>		Other Cabinet Members consulted: None			
		Other Members consulted:			
Lead Officer: Nikki Patton E-mail: <i>Nikki.patton@west-norfolk.gov.uk</i> Direct Dial: 01553616726		Other Officers consulted: Oliver Judges Executive Director of Place Duncan Hall Assistant Director of Regeneration, Housing & Place Becky Box Assistant Director Central Services Sarah Daly Finance			
Financial Implications Yes	Policy/ Personnel Implications YES	Statutory Implications YES	Equal Impact Assessment YES If YES: Pre-screening/	Risk Management Implications Yes	Environmental Considerations No

Date of meeting: 15th January 2024

HOUSING OPTIONS OFFICER POST

Summary

The purpose of the report is to seek agreement to increase the Housing Options team by one permanent full time post to respond to an increasing demand for homelessness services, fulfil statutory duties in relation to housing and support strategic objectives of preventing homelessness.

RECOMMENDATION

That an additional permanent full time Housing Options Officer post be created.

Reason for Decision

To ensure that the Council fulfils its statutory duties in relation to homelessness and has the resource and capacity provide advice and assistance to those in greatest housing need.

1 Background

Enquiries to the Council's Housing Options team have increased by 25% in the last year and by 127% in the last three years. Homelessness presentations have doubled in the past year. These trends are expected to increase due to cost of living pressures, a shrinking private rented sector and low levels of affordable housing supply and turnover. Caseload numbers per

full-time officer (average 45 cases per officer) are significantly higher than the recommended case load number by DLUHC (30-35 per officer)

In summary numbers have been driven upwards by:

- High levels of single people with multiple and complex needs (including mental health, substances and offending histories),
- High levels of victim-survivors of domestic abuse.

2 The proposal

As part of the transition of Housing Options to Place Directorate an internal review identified a number of gaps in relation to capacity. A recent re-structure has increased capacity within the team utilising existing posts and other temporary funding streams. However, a gap still remains. In order to fulfil statutory duties and support the prevention objective a full time permanent Housing Options post is required. This proposal forms part of longer-term sustainable options to address staffing issues across the Housing Options area and to appropriately respond to increased numbers of homeless households and subsequent demand on the service area.

3 Impact on the service's ability to prevent homelessness.

The Homelessness & Rough Sleeping strategy, which is currently being reviewed, will include firm objectives around homelessness prevention ie preventing the household from becoming homeless in first place and therefore reducing the need for temporary accommodation). We would like to see the council in the top half nationally of Government performance tables within the first year of the strategy and within the top 25% within its lifespan.

To address this, the forthcoming Homelessness and Rough Sleeping Strategy will have prevention at its heart. It will:

- improve the outcomes achieved for people facing homelessness,
- reduce Temporary Accommodation and B&B use and
- potentially increase the level of Homelessness Prevention Grant paid to the council by central government via improved data collection and reporting which in turn supports further homelessness prevention work

The proposal will enable the team to dedicate more time to prevention moving away from reactive position and towards achieving a 'prevention first' approach that has long been its aim.

In summary, the service needs to:

- be effective in its response to Homelessness and Rough Sleeping
- meet the objectives of the Council's adopted Homelessness & Rough Sleeping Strategy and

- fulfil its statutory duties.

To achieve this, it is imperative that it moves away from a reactive response to a more sustainable prevention strategy that:

- provides better outcomes for people seeking housing support,
- supports staff wellbeing and retention via reduced caseloads and
- is more financially sustainable for the Council overall (reducing numbers in B&B and reducing staff turnover).

The proposal as part of wider staffing changes would strengthen the team significantly, enabling officers to provide:

- A higher quality of advice and assistance to homeless applicants,
- A greater emphasis on partnership working (with statutory services, commissioned agencies and private landlords, amongst others) to resolve homelessness,
- A significantly reduced level of spend on bed and breakfast and nightly paid accommodation,
- A reduction in staff turnover and burnout (and a subsequent reduction in recruitment costs)
- Ultimately, a service that aims to prevent homelessness in all cases, seeking to minimise the impact and trauma caused where homelessness cannot be prevented.

4 Options Considered

There is no option to carry on as we are. All other options utilising temporary funding streams from central Government to create additional fixed term capacity (fixed term posts) have been utilised along with re-structuring existing posts. There is no further capacity within the service area to respond to the significant increase in demand for the service. Without the additional permanent post we will be unable to fulfil statutory duties in relation to homelessness and support the objective of preventing homelessness at an earlier stage to reduce the use of temporary accommodation and the use of B&B accommodation for homeless households including families with children.

5 Policy Implications

None

6 Financial Implications

It is proposed that the Council utilises some of the funding it receives from Central Government ringfenced for Housing services to support the post for three years. The Homelessness Prevention Grant that Council receives annually from Central Government specifies supporting staff costs as an acceptable use of funding.

The approximate cost for a PG10 Housing Options Officer including oncosts will be £40,000, in addition to this there will be costs for IT equipment and office costs. This can be funded for 3 years from the Homelessness Prevention Grant.

Wider financial implications- without additional staff capacity to support homelessness prevention work and respond to existing high case loads, the numbers in temporary accommodation and B&B are likely to remain high which has a direct financial cost to the Council.

7 Personnel Implications

The proposals outlined in this report will see the Council's permanent staff establishment increase by one full time post in order to meet increased demand for services within the Housing Options team. The team has recently undertaken a review of existing capacity within the team and the need for an additional post has been highlighted as part of this review. The additional post will help the team to respond effectively to the increased number of homeless households accessing the service, supporting the corporate objective of ensuring efficient and effective delivery of services which met the needs of our local communities.

8 Environmental Considerations

None

9 Statutory Considerations

The post will provide additional staff capacity to ensure the Councils statutory duties in relation to providing Housing advice and assistance to homelessness households are fulfilled. The post also will provide resource to support the objectives of the Councils Homelessness and Rough Sleeping Strategy 2019-2024 and the new objectives in the emerging Homelessness and Rough Sleeping Strategy 2024- 2029

10 Equality Impact Assessment (EIA)

Pre-screening report attached.

11 Risk Management Implications

The Council has a statutory duty to support homeless households. The risk of not appropriately resourcing the Housing team to respond to the increasing demand for homelessness services will significantly impact on the Councils ability to fulfil its statutory duties in relation to Homelessness and provide support and assistance to some of the most vulnerable members of the community.

12 Declarations of Interest / Dispensations Granted

none

Appendix 1 - Pre-Screening Equality Impact Assessment

Borough Council of
King's Lynn & West Norfolk



Name of policy/service/function	Housing Needs				
Is this a new or existing policy/service/function?	New post				
<p>Brief summary/description of the main aims of the policy/service/function being screened.</p> <p>Please state if this policy/service is rigidly constrained by statutory obligations</p>	<p>To increase the Housing Options team by one permanent full time post to respond to an increasing demand for homelessness services, fulfil statutory duties in relation to housing and support strategic objectives of preventing homelessness.</p>				
Question	Answer				
<p>1. Is there any reason to believe that the policy/service/function could have a specific impact on people from one or more of the following groups according to their different protected characteristic, for example, because they have particular needs, experiences, issues or priorities or in terms of ability to access the service?</p> <p>Please tick the relevant box for each group.</p> <p>NB. Equality neutral means no negative impact on any group.</p>		Positive	Negative	Neutral	Unsure
	Age			x	
	Disability			x	
	Gender			x	
	Gender Re-assignment			x	
	Marriage/civil partnership			x	
	Pregnancy & maternity			x	
	Race			x	
	Religion or belief			x	
	Sexual orientation			x	
	Other (eg low income)			x	

Question	Answer	Comments
<p>2. Is the proposed policy/service likely to affect relations between certain equality communities or to damage relations between the equality communities and the Council, for example because it is seen as favouring a particular community or denying opportunities to another?</p>	No	
<p>3. Could this policy/service be perceived as impacting on communities differently?</p>	No	
<p>4. Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?</p>	yes	<p>To ensure that the Council fulfils its statutory duties in relation to homelessness and has the resource and capacity provide advice and assistance to those in greatest housing need.</p>
<p>5. Are any impacts identified above minor and if so, can these be eliminated or reduced by minor actions?</p> <p>If yes, please agree actions with a member of the Corporate Equalities Working Group and list agreed actions in the comments section</p>	No	<p>Actions: N/A</p> <hr/> <p>Actions agreed by EWG member: </p>
<p>If 'yes' to questions 2 - 4 a full impact assessment will be required unless comments are provided to explain why this is not felt necessary:</p> <p>Decision agreed by EWG member:</p>		
<p>Assessment completed by: Name Nikki Patton</p>		
<p>Job title Housing Services Manager</p>		
<p>Date 4th Dec 2023</p>		

Appendix 1 - Pre-Screening Equality Impact Assessment

Borough Council of
King's Lynn & West Norfolk



Name of policy/service/function	Housing Needs				
Is this a new or existing policy/service/function?	New post				
<p>Brief summary/description of the main aims of the policy/service/function being screened.</p> <p>Please state if this policy/service is rigidly constrained by statutory obligations</p>	<p>To increase the Housing Options team by one permanent full time post to respond to an increasing demand for homelessness services, fulfil statutory duties in relation to housing and support strategic objectives of preventing homelessness.</p>				
Question	Answer				
<p>1. Is there any reason to believe that the policy/service/function could have a specific impact on people from one or more of the following groups according to their different protected characteristic, for example, because they have particular needs, experiences, issues or priorities or in terms of ability to access the service?</p> <p>Please tick the relevant box for each group.</p> <p>NB. Equality neutral means no negative impact on any group.</p>		Positive	Negative	Neutral	Unsure
	Age			x	
	Disability			x	
	Gender			x	
	Gender Re-assignment			x	
	Marriage/civil partnership			x	
	Pregnancy & maternity			x	
	Race			x	
	Religion or belief			x	
	Sexual orientation			x	
Other (eg low income)			x		

11. Background Papers

REPORT TO CABINET

Open		Would any decisions proposed :			
Any especially affected Wards	Discretionary	(a) Be entirely within cabinet's powers to decide NO			
		(b) Need to be recommendations to Council		YES	
		(c) It it a Key Decision		NO	
Lead Member: Cllr Terry Parish E-mail: cllr.terry.parish@west-norfolk.gov.uk		Other Cabinet Members consulted:			
		Other Members consulted: Group Leaders			
Lead Officer: Samantha Winter E-mail: sam.winter@west-norfolk.gov.uk Direct Dial: 01553 616327		Other Officers consulted: Chief Executive, Monitoring Officer			
Financial Implications YES	Policy/Person nel Implications NO	Statutory Implications (incl S.17) YES	EIA Implications NO	Risk Management Implications NO	Environmental Implications No

Date of meeting: 5 December 2023

ELECTION OF HONORARY ALDERMAN

Summary

Following the 2023 Borough Council Elections, the opportunity has been taken to review the appointments of new Honorary Aldermen. Consideration has now been given to nominations by Group Leaders and it has been agreed to bring forward five individuals at this stage to enable time to review the criteria for nominations.

Recommendations

1) That the Council places on record its deep appreciation of the eminent services to the Council rendered by former Councillors:

**Kathleen Collins (previously Mellish)
David Collis
Michael Peake
Geoffrey Hipperson
Andrew Tyler**

2) That a Special Meeting of the Council to confer the title of Honorary Alderman on those former Councillors be held after Mayormaking on Thursday, 16 May 2024 and the engrossment of recommendation above and an Aldermanic badge be presented to the Honorary Aldermen at that Council meeting.

3) That a further report be brought forward reviewing the criteria of nominating Honorary Aldermen before any further nominations are considered by the Council.

1 Background

Under the Local Government Act 1972 (section 249), “the Council may, by a resolution passed by not less than two-thirds of the members voting thereon at a Special Meeting of the Council called specifically for that purpose, confer the title of Honorary Alderman on persons who have in the opinion of the Council rendered eminent services to the Council as past members of the Council but who are not then Councillors of the Council.”

The following criteria were also taken into account on this and previous occasions by each of the political groups in making the nominations:

- 1 Having held high office, Mayor/Cabinet position or Committee Chairmanship.
- 2 Having held some lesser office (Deputy Mayor/Vice-Chairmanship) but also having demonstrated eminent service, eg long service as a Borough Councillor.
- 3 Other eminent service in the capacity of a Councillor eg nominated Council representative on important outside bodies.
- 4 Recognition across the chamber that the former Member has provided eminent service, albeit non-specific, to the Council by virtue of his/her contributions over many years.
- 5 No known misdemeanours

2 Process

Following the 2023 Borough Council Elections, Council has undertaken a review of those former Councillors it wishes to nominate as new Honorary Aldermen. Group Leaders have now held discussions and agreed that a small number of nominees will be put forward at this stage. A report on the review of the criteria for nominating Aldermen will come forward to a future meeting of Cabinet and Council before other nominations are put forward.

It is recommended that the following former Councillors be recommended Council to consider awarding them the title of Honorary Alderman:

- Kathy Collins (previously Mellish) - Mayor and Cabinet Member
- David Collis - Vice Chair of Development and Estates and Chair of the CSC
- Geoffrey Hipperson – Twice Mayor and Cabinet Member
- Mick Peake – Vice Chair Planning and longstanding councillor
- Andrew Tyler – Deputy Mayor and long standing councillor – chair of KLACC

It is suggested that the Special Meeting of the Council required to approve and confer the titles be held after Mayormaking on Thursday 16 May 2024.

It is proposed that the engrossment of the recommendation above and an Aldermanic badges be presented to the Honorary Aldermen at that Special Council Meeting.

3 Financial Implications

The cost of purchasing the Honorary Aldermen badges and engrossments and a reception hosted by the Mayor after the ceremony will cost in the region of £5,000.

4 Statutory Considerations

The process complies with the requirements of the Local Government Act 1972, section 249.

5 Background Papers

None

Pre-Screening Equality Impact Assessment

Borough Council of
King's Lynn & West Norfolk



Name of function	Honorary Aldermen				
Is this a new or existing policy/service/function?	Existing (delete as appropriate)				
<p>Brief summary/description of the main aims of the policy/service/function being screened.</p> <p>Please state if this policy/service is rigidly constrained by statutory obligations</p>	Awarding of Honorary Alderman status				
Question	Answer				
<p>1. Is there any reason to believe that the policy/service/function could have a specific impact on people from one or more of the following groups according to their different protected characteristic, for example, because they have particular needs, experiences, issues or priorities or in terms of ability to access the service?</p> <p>Please tick the relevant box for each group.</p> <p>NB. Equality neutral means no negative impact on any group.</p>		Positive	Negative	Neutral	Unsure
	Age			x	
	Disability			x	
	Gender			x	
	Gender Re-assignment			x	
	Marriage/civil partnership			x	
	Pregnancy & maternity			x	
	Race			x	
	Religion or belief			x	
	Sexual orientation			x	
	Other (eg low income)				

REPORT TO CABINET

Open/Exempt		Would any decisions proposed :		
Any especially affected Wards	Mandatory/	Be entirely within Cabinet's powers to decide	YES/NO	
	Discretionary/	Need to be recommendations to Council	YES/NO	
	Operational	Is it a Key Decision	YES/NO	
Bircham with Rudhams Denver Emneth with Outwell Feltwell Methwold Tilney, Mershe Lande and Wiggshall Upwell, Outwell and Delph Walsoken, West Walton and Walpole				
Lead Member: <i>cllr.James.Moriarty@West-Norfolk.gov.uk</i>		Other Cabinet Members consulted: Cllr Terry Parish, Cllr Stuart Dark, Cllr Francis Bone and other cabinet members		
		Other Members consulted: Local Plan Task Group		
Lead Officer: Stuart Ashworth <i>Stuart.ashworth@west-norfolk.gov.uk</i>		Other Officers consulted: Planning policy team, Development Management Team, Strategic Housing Team, Planning Enforcement		
Financial Implications YES/NO	Policy/Personnel Implications YES/NO	Statutory Implications YES/NO	Equal Impact Assessment YES/NO If YES: Pre-screening/ Full Assessment	Risk Management Implications YES/NO
If not for publication, the paragraph(s) of Schedule 12A of the 1972 Local Government Act considered to justify that is (are) paragraph(s) .				

Date of meeting: 15 January 2024

LOCAL PLAN REVIEW – GYPSY AND TRAVELLER POTENTIAL SITES AND POLICY CONSULTATION

Summary

As part of the Local Plan process, the council has produced a draft consultation document on proposed locations to meet the accommodation needs of Gypsies, Travellers and Travelling Showpeople in the borough. It incorporates the list of existing sites across the borough, the methodology used for assessment, those sites that are preferred to accommodate the identified needs and planning policies to manage such developments over the plan period to 2039. This is an essential part of the Local Plan process, and this work must be carried out before the Local Plan can be adopted.

This report to Cabinet seeks authority to proceed with a consultation on potential sites. The consultation would run for 6 weeks, and would help to inform a final proposed Gypsy, Traveller and Travelling Showpeople policy, which will be submitted to Cabinet for approval in April 2024, to be submitted for formal Examination in July 2024.

Recommended that:

1. Cabinet endorses the draft Gypsy, Travellers and Travelling Showpeople Potential Sites and Policy document, the Gypsy and Traveller Site Assessment Document, the associated Strategic Flood Risk Assessment and the Sustainability Appraisal, for consultation, for a period of 6 weeks from the 26th January until the 8th March 2024.
2. That delegated authority be granted to the Portfolio Holder for Development and Regeneration, and the Assistant Director – Environment & Planning, to include minor amendments as required to the consultation document prior to consultation starting at the end of January.

Reason for Decision

The Borough Council must allocate land to meet the accommodation needs for Gypsies, Travellers and Showpeople through the replacement Local Plan. The Local Plan is unlikely to be found sound at examination if insufficient land is allocated to address this need.

Cabinet approval is being sought to publish potential site allocations for consultation. It is also seeking authority to make minor amendments to the consultation document as necessary for clarity ahead of the formal consultation period. Following the consultation, and after a further assessment, Full Council will need to endorse the final preferred site-specific allocations for submission to the Planning Inspectors as part of the ongoing Local Plan examination.

1. Background

- 1.1 In January 2023, the Council commissioned a Gypsy and Traveller Accommodation Assessment (GTAA) to support the examination of the emerging Local Plan. This study provides the evidence on the accommodation need for Gypsies, Travellers and Travelling Showpeople that we will plan for until 2039.
- 1.2 The GTAA is an essential requirement of the Local Plan, and need must be met as part of the Local Plan process. National guidance on this is provided in the Government's planning policy for traveller sites (PPTS).
- 1.3 The information provided in the GTAA is based on interviews with Gypsies, Travellers and Travelling Showpeople that were undertaken on sites and yards across the Borough. It identifies accommodation need for households that meet the planning definition of Gypsy and Travellers and Travelling Showpeople as required by National Planning Policy; households who do not; and households that are undetermined. Those

household needs that do not meet the definition or are undetermined will be managed in accordance with proposed policies in the consultation document and other Local Plan policies under examination.

1.4 The GTAA identified a need for 102 pitches over the plan period, but importantly 76 of these were identified to be provided within the first 5 years of the plan. It should be noted that the PPTS states that there is a requirement to identify and update annually a supply of specific deliverable sites sufficient to provide 5 years worth of sites, so it is particularly important that this need is met early within the plan period.

1.5 Since the publication of the GTAA, two appeal decisions for existing sites has resulted in the number of pitches required over the plan period and within the first 5-years being reduced from 102 to 97 and 76 to 71 respectively. This figure could also change further with pending applications and appeals in the system.

Gypsy and Traveller Accommodation Requirements to 2039

Year Period	Dates	Need
0-5	2023-2027	71
6-10	2028-2032	10
11-15	2033-2037	11
16-17	2038-2039	5
0-17		97

Gypsy Traveller and Travelling Showpeople Accommodation Requirements to 2039

Year Period	Dates	Need
0-5	2023-2027	4
6-10	2028-2032	0
11-15	2033-2037	1
16-17	2038-2039	0
0-17		5

1.6 In response to the GTAA, when assessing potential sites, site-specific constraints such as access issues, access to local services and flood risk have been assessed. The assessment of sites has then identified whether sites are available, suitable and deliverable for further development, through the Gypsy and Traveller Site Assessment Document.

1.7 The Council believes that where existing sites have a direct opportunity to meet these localised accommodation needs, then further investigation must be undertaken to identify whether potential constraints identified on some sites could be overcome through mitigation measures. Work on these constraints is currently being undertaken with statutory consultees and the Council has produced a Strategic Flood Risk Assessment and Sustainability Appraisal to support the consultation.

- 1.8 In cases where there is little likelihood that constraints can be suitably mitigated, then alternative locations (Broad Locations) have been identified to accommodate any residual need. These locations are also subject to consultation.
- 1.9 The policies in the consultation document identify the list of sites and yards that have the potential to accommodate some of the required need. In most cases, the need will be accommodated on existing and established sites.
- 1.10 Two sites are proposed to have existing unauthorised pitches regularised (by way of a Local Plan site allocation). A new site has also been identified at West Dereham, which is currently the subject of a planning application.
- 1.11 Proposed policies A and B provide a framework to assess any future planning proposals for Gypsy and Traveller pitches/plots over the Plan period.
- 1.12 The full document is available (together with the supporting material) at: [Consultation on additional evidence base documents | Consultation on additional evidence base documents | Borough Council of King's Lynn & West Norfolk \(west-norfolk.gov.uk\)](#)

2. Consultation process

2.1 The main elements of the consultation process are intended to be:

Web version of the Local Plan Review document with ability to enter comments against particular paragraphs or policies	Using our 'Objective' consultation system to enable easy entry of comments and subsequent analysis
E-mail notification of consultees; parish and town councils; other interested parties – parties who were consulted for the recent Consultation on additional evidence base documents (September/ October 2023) and any other parties that have subsequently expressed an interest in the ongoing Local Plan process	Wide notification of the fact that the LPR is at consultation and response / clarification opportunities.
Libraries	Hard copies of the reports will be made available at the following locations: Gaywood Library Kings Lynn Library Dersingham Library Downham Market Library Wisbech Library

	Hunstanton Library
Council Offices	Hard copies of the reports will be made available at the Council Offices at Kings Court, Kings Lynn

2.2 In terms of timescale we would aim to start the consultation from the 26th January and finish on the 8th March 2024 (6 weeks). Following this, the proposed timetable for remaining work and decisions on this matter, includes:

3. Options Considered

3.1 This is essential work that must be carried out to deliver the Local Plan, and to enable it to be found sound. Therefore, not undertaking the work is not an option.

3.2 The Sustainability Appraisal considers several “reasonable alternative” options considered as part of the strategy to accommodate the need for Gypsy and Travellers. These include:

- Provide the need on existing authorised sites; and/ or
- Provide the need on existing authorised sites and authorise those suitable pitches that are currently unauthorised or tolerated; and/ or
- Provide new sites to accommodate the need and/ or
- Provide the need through a combination of the above mechanisms.

All of these potential options will be subject to consultation.

4. Policy Implications

4.1 If the Council does not adequately address the accommodation needs for our communities, then it is likely to lead to the Local Plan being found ‘unsound’ through its ongoing examination process. This would lead to failure of the entire Plan and would leave the Borough vulnerable to unwanted or speculative development proposals, potentially granted through the planning appeals process.

5. Financial Implications

5.1 None specifically.

6. Personnel Implications

6.1 None specifically.

7. Statutory Considerations

7.1 The Town and Country Planning (Local Planning) (England) Regulations 2012 Regulation 18 outlines the requirements for the consultation etc.

7.2 The wider plan preparation process is covered in the Regulations, and practice guidance from Government, including that of Duty to Cooperate. Plan-making is covered by the following primary legislation:

- 1990 Town and Country Planning Act (as amended);
- 2004 Planning and Compulsory Purchase Act (as amended);
- 2011 Localism Act (as amended);
- 2023 Levelling Up and Regeneration Act (to be implemented during 2024).

8. Equality Impact Assessment (EIA)

8.1 A full EIA is attached.

9. Risk Management Implications

9.1. The Council has a duty under the Housing Act 2004 and the Equality Act 2010 to provide a sufficient supply of homes to accommodate all housing needs in the borough through the Local Plan. This includes the provision for Gypsies and Travellers. If the Council fails to meet these needs, then it could have negative implications for the progression of the Local Plan through its Examination and likely lead to speculative developments and unauthorised Gypsy and Traveller encampments around the borough.

10. Declarations of Interest / Dispensations Granted

10.1. None

11. Background Papers

(Definition: Unpublished work relied on to a material extent in preparing the report that disclose facts or matters on which the report or an important part of the report is based. A copy of all background papers must be supplied to Democratic Services with the report for publishing with the agenda)

	Planning Policy examination web page: Local Plan Review (2016-2036) examination Local Plan Review (2016-2036) examination Borough Council of King's Lynn & West Norfolk (west-norfolk.gov.uk)
Gypsy and Traveller Potential Sites and Policy Consultation Document	Consultation on additional evidence base documents Consultation on additional evidence base documents Borough Council of King's Lynn & West Norfolk (west-norfolk.gov.uk)
Gypsy and Traveller Site Assessments	Report to be made available for the consultation on the 26 th January 2024.
Gypsy and Traveller Sustainability Appraisal (External Report)	Report to be made available for the consultation on the 26 th January 2024.
Gypsy and Traveller Strategic Flood Risk Assessment (Level 2) (External Report)	Report to be made available for the consultation on the 26 th January 2024.



**Pre-Screening Equality Impact
Assessment**

Name of policy/service/function	Local Plan Review – Gypsy and Traveller Accommodation. Planning Policy, Planning Service				
Is this a new or existing policy/ service/function?	New Existing, but it is now being reviewed as part of the ongoing examination in public of the Kings Lynn and West Norfolk Local Plan.				
Brief summary/description of the main aims of the policy/service/function being screened. Please state if this policy/service rigidly constrained by statutory obligations	The Council is required to undertake work to demonstrate that it can accommodate the current and future accommodation needs for the Gypsy and Traveller Community. The Council has produced a Potential sites/ locations and Policies to deal with meeting the identified accommodation needs of Gypsies, Travelers and Travelling Showpeople in the Borough to 2039.				
Question	Answer				
<p>1. Is there any reason to believe that the policy/service/function could have a specific impact on people from one or more of the following groups according to their different protected characteristic, for example, because they have particular needs, experiences, issues or priorities or in terms of ability to access the service?</p> <p>Please tick the relevant box for each group.</p> <p>NB. Equality neutral means no negative impact on any group.</p>		Positive	Negative	Neutral	Unsure
Age				x	
Disability				x	
Gender				x	
Gender Re-assignment				x	
Marriage/civil partnership				x	
Pregnancy & maternity				x	
Race	x				
Religion or belief	x				
Sexual orientation				x	
Other (eg low income)				x	
Question	Answer	Comments			
2. Is the proposed policy/service likely to affect relations between certain equality communities or to damage relations between the equality communities and the Council, for example because it is seen as favouring a particular community or denying opportunities to another?	Yes/ No	The proposed planning policies have been produced to specifically manage future development needs for Gypsies, Travellers and Travelling Showpeople. Gypsies and Travellers are classed as a “protected group” under the 2010 Equality Act, so their accommodation needs must be addressed accordingly.			
3. Could this policy/service be perceived as impacting on communities differently?	Yes/ No	Due to the unique accommodations needs for the Gypsy and Traveller community, the proposed sites and policy provide some departure to existing planning policies for other forms of housing accommodation.			
4. Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?	Yes / No	No, the Policy is designed to enable a positive planning policy mechanism for the Gypsy and Traveller community to apply for Planning Permission.			
5. Are any impacts identified above minor and if so, can these be eliminated or reduced by minor actions? If yes, please agree actions with a member of the Corporate Equalities Working Group and list agreed actions in the comments section	Yes / No	<p>Actions: None</p> <p>Actions agreed by EWG member: N/a</p>			
Assessment completed by: Luke Brown	124				
Job title Senior Planning Policy Officer					

Please Note: If there are any positive or negative impacts identified in question 1, or there any 'yes' responses to questions 2 – 4 a full impact assessment will be required.



Borough Council of King's Lynn and West Norfolk Local Plan Examination

Gypsy and Travellers and Travelling Showpeople Potential Sites and Policy Consultation

January 2024

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1. Scope of this document

1.1. The Council's Local Plan is required, by the National Planning Policy Framework (NPPF), to identify and meet accommodation needs for Gypsies and Travellers and Travelling Showpeople over the Local Plan period until 2039. The documents seek to achieve this through a combination of ways:

- Identifying those sites and locations appropriate for accommodating the required Gypsies and Travellers and Travelling Showpeople need; and
- Planning policies to help manage future development for Gypsy and Traveller use over the plan period.

1.2. We are seeking your views on the following:

- The proposed strategy for accommodating Gypsy and Traveller provision in the Borough; and
- The proposed sites/yards and broad locations identified to potentially accommodate the required need; and
- The proposed planning Policies designed to manage new Gypsy and Travellers and Travelling Showpeople developments in the future.

1.3. Full details of how to respond to the forthcoming consultation (26 January – 8 March 2024) are available in Section 10 of this document.

2. Gypsies and Travellers in Kings Lynn and West Norfolk

2.1. There is a well established Gypsy & Traveller Community in the Borough. The majority of sites are privately owned family sites with close and extended family members. The majority of the future need is arising from these sites where children and existing family members require their own pitches over the plan period.

2.2. There are around 60 existing authorised and unauthorised sites across the Borough with 200 pitches and plots. These sites vary in size, but the majority are small in scale and are privately owned. There are currently two public sites in the Borough; one at Saddlebow on the edge of King's Lynn, and the other at Blunts Drove, in the parish of West Walton.

2.3. Most of the existing sites are located in the Fens area of the borough, to the east of Wisbech. Over 70% of existing sites are situated in the parishes of Outwell, Upwell and Walsoken and it is these areas where a particular current and future need has been identified.

3. Why is it Important to Meet Accommodation Needs?

3.1. The Council has a legal duty under the Housing Act 2004 and through National Planning Policy to accommodate the housing needs of the borough, including those for Gypsies and Travellers and Travelling Showpeople.

3.2. Having a lack of supply of permanent accommodation can adversely affect the travelling community. Providing enough suitable accommodation improves the ability to meet other primary needs, especially education and health. Accommodation also enables Gypsy and Travellers to continue to live a nomadic life, in line with their culture and traditions. It also enables greater access to employment opportunities for families to remaining together.

3.3. The provision of suitable permanent accommodation also reduces the risk of unauthorised encampments across the borough.

4. The Aim of this Document

4.1. The aim of this document is to propose the Borough Council’s preferred proposals to fully meet the accommodation needs for Gypsy and Traveller pitches and Travelling Showpeople plots to 2039. This will be achieved through site allocations and/ or Broad Locations for growth; and to provide a policy framework for assessing future proposals.

5. Permanent Accommodation Requirements

5.1 In January 2023, the Council commissioned a Gypsy and Traveller Accommodation Assessment (GTAA) which is published alongside this consultation document. This study provides the evidence on accommodation need that we will plan for until 2039.

5.2 The information provided in the GTAA is based on interviews with Gypsies, Travellers and Travelling Showpeople that were undertaken on sites and yards across the Borough. It identifies accommodation need for households that meet the planning definition in the PPTS; households who do not; and households that are undetermined. Those households needs that do not meet the definition or are undetermined will be managed in accordance with proposed Policies in this document and other Local Plan policies.

5.3 Since the publication of the Gypsy and Traveller Accommodation Assessment (GTAA), decisions on recent planning appeals has resulted in the number of pitches required over the plan period and within the first 5-years being reduced from 102 to 97 and 76 to 71 respectively.

Gypsy and Traveller Accommodation Requirements to 2039

Year Period	Dates	Need
0-5	2023-2027	71
6-10	2028-2032	10
11-15	2033-2037	11
16-17	2038-2039	5
0-17		97

5.4 The needs assessment identified a requirement for 71 pitches in the first 5-years for households meeting the planning definition. Need occurring after year

5 results from household formation set out in Government policy guidance. This is particularly important because the borough council is required to maintain a 5-year supply of gypsy and traveller sites. The allocations and policies in this document would allow the council to meet this national policy requirement.

Gypsy Traveller and Travelling Showpeople Accommodation Requirements to 2039

Year Period	Dates	Need
0-5	2023-2027	4
6-10	2028-2032	0
11-15	2033-2037	1
16-17	2038-2039	0
0-17		5

6. Proposed Approach to meeting the Accommodation Needs

- 6.1. Accommodation needs should be met on authorised pitches/plots. Pitches for Gypsy and Travellers ordinarily include space for a static caravan, a tourer, car parking, a dayroom and open space. The Gypsy and Traveller Accommodation Assessment (GTAA) advises that teenage children’s accommodation needs can sometimes be met through the provision of a touring caravan. Similarly, adults may not need a formal pitch, but their accommodation needs could be met through provision of additional touring caravans.
- 6.2. Typically, pitch densities on-site are lower than for normal residences. Accordingly, in calculating the capacities for new sites, a standard of 7 pitches per ha is utilised, although final capacity may vary on a site-by-site basis, with reference to development constraints and existing occupation.
- 6.3. Plots for Travelling Showpeople also include the above but tend to be larger still. These generally require space for equipment such as for fairs and rides that need to be stored on-site, for security and maintenance.
- 6.4. Commonly, there is a desire for households to remain on a family site. It is therefore proposed, where there is available capacity, that accommodation should be provided on existing lawful sites in the first instance to meet requirements. These sites already benefit from planning permission, services and could have the potential to accommodate additional pitches either through intensification or extension.
- 6.5. Unauthorised sites will then be assessed to see if they can be formalised through an allocation in the Plan. Both assessments have been systematically undertaken within the Council Site Assessments for Gypsy and Traveller Provision.

- 6.6. The Council anticipate that the majority of the first five-year requirements could be met on existing sites where needs are arising (subject to any identified planning constraints being overcome). This also works in the interests of making the most efficient use of existing sites and ensuring that need is genuinely met in the correct locations.
- 6.7. Any residual requirements are proposed to be met through new site allocations or by identifying broad locations for growth in the Plan.
- 6.8. To understand whether the identified needs can be met through the intensification of existing sites, the Council has undertaken a site assessment for all existing Gypsy and Traveller and Travelling Showpeople sites/ yards across the Borough. This has looked at all known planning constraints such as access, flood risk and access to local services. It has then identified whether sites are available, suitable and deliverable for further development. Due to the nature of these sites and because the needs are arising from individual sites, the Council has included those sites, as exceptions that would normally be discounted on suitability grounds. The Council believes that where existing sites have an opportunity to meet these direct accommodation needs, then further investigation must be undertaken to identify whether constraints can be overcome through mitigation measures such as flood mitigation in areas that are at risk from flooding.
- 6.9. In cases where there is little likelihood that constraints can be suitably mitigated, then alternative locations (Broad Locations) will be identified and allocated. The Council are also consulting on these sites as well as the preferred sites.
- 6.10. The Policies on Pages 5 to 8 (below) identify the list of sites and yards that have the potential to accommodate some of the required need. In most cases, the need has directly arisen from existing and established these sites. The proposed numbers of pitches and/ or plots for sites are indicative at this stage. The policies also provide a framework to assess any future planning proposals.
- 6.11. The site profiles from Page 10 provide more detail about each site and a location plan showing the extent of the site/yards and those broad locations for growth.

7. Potential Locations and Planning Policy for Accommodating the Permanent Need for Gypsy, Travellers and Travelling Showpeople

Proposed POLICY A: Sites for Gypsies and Travellers, and Travelling Showpeople

1. The permanent accommodation needs of the Borough's Gypsy and Traveller community will be met through the provision for 97 permanent pitches by 2039, with approximately 71 permanent pitches to be delivered by 2028-2029, through a combination of:
2. The designation and protection of existing authorised Gypsy and Traveller sites;
3. The establishment or re-establishment of pitches within an existing authorised Gypsy and Traveller site and/or the extension and/or intensification of existing authorised Gypsy and Traveller sites at:

Ref	Site Name/address	Indicative Number of additional Pitches in relation to their existing capacity
GT05	19 - 121 Magdalen Road, Tilney St Lawrence	1
GT11	Homefields, (Western Side, Goose Lane), Walpole St Andrew	1
GT17	Land at The Lodge, Small Lode, Upwell	1
GT18	Land at 2 Primrose Farm, Small Lode, Upwell	5
GT20	Land at Botany Bay, Upwell	1
GT21	Land at Four Acres, Upwell	1
GT28	Many Acres (Smithy's Field), Small Lode, Upwell, Norfolk	2
GT34	Land at Creaksville, South Creake	1
GT35	Land at Green Acres, Upwell	2
GT39	Land at Oak Tree Lodge, The Common, South Creake	3
GT42	Land at Red Barn, Cowles Drove, Hockwold cum Wilton	3
GT54	Land at the Pines, Whittington	1
GT55	Land at Victoria Barns, Basin Road, Outwell	1
GT56	Wheatley Bank, Walsoken (South of Worzals paralell to A47)	9
GT59	Land at Spriggs Hollow, Wiggenhall St Mary Magdalen	4
GT66	Land at Brandon Road, Methwold	1

4. The formalisation of pitches in use by the Gypsy and Traveller community at:

Ref	Site Name/address	Number of Pitches to be Authorised
GT09	The Stables, Walpole St Andrew	1
GT33	Land Next to Clydesdale, Biggs Road, Walsoken	1
GT43	Homefield, Common Rd South, Walton Highway	1
GT59	Spriggs Hollow, Wiggenhall St Mary Magdalen	1

5. New sites at:

Ref	Site Name/address	Indicative Number of Pitches in relation to their capacity
GTRA(B)	Land at Station Road, West Dereham	10
GTRA(C)	Land to the West of Country Park Travellers Site Wheatley Bank, Walsoken	1

6. The following authorised existing sites are identified on the Policies Map for additional Travelling Showpeople and are safeguarded for such use:

Ref	Site Name/address	Indicative Number of additional Plots in relation to their existing capacity
GT25	Land at the Oaks, Northwold	1
GT62	Land at Redgate Farm, Magdalan Road, Tilney St Lawrence	2
GT67	Llamedos - Syderstone	1

7. In cases where the required 5-year need cannot be met via the sites identified in Parts 3-5 of this Policy, then the following Broad Locations for growth will be considered:

Ref	Site Name/address	Indicative Number of Pitches for the Broad Location in relation to their capacity
GT14 (Broad Location)	Land to the rear of West Walton Court, Blunts Drove, Walton Highway (Public Site)	10
GT17 Broad Location	Land to the rear of The Lodge, Small Lode, Upwell	13
GT18 Broad Location	Land to the rear of 2 Primrose Farm, Small Lode, Upwell	8
GT21 Broad Location	Land to the rear of Four Acres, Upwell	4
GT37 Broad Location	Land to the rear of Green Acres, Small Lode, Upwell	7
GT38 Broad Location	Land to the rear of Green Acres, Small Lode, Upwell	10
F3.1	Land at Wisbech Fringe Strategic Allocation	10

8. Proposals for new Gypsy and Traveller sites, and/or the extension, and/or intensification of existing authorised Gypsy and Traveller sites to address needs beyond 2027-2028 should:
- in the case of an extension, be small scale, intensify the use of an existing authorised, well managed site and/or make effective use of brownfield land, where possible;
 - provide satisfactory access to community services and facilities such as health and education provision;
 - be of a scale that is appropriate to local character, its local services and infrastructure and would not overwhelm the nearest settled community;
 - have suitable, safe and convenient access to the highway network;
 - have the ability to connect to all necessary utilities on the site including mains water, electricity supply, drainage, sanitation and provision for the screened storage and collection of refuse, including recyclable materials;
 - have the ability to be well integrated into the local townscape or landscape, have no unacceptable impact on biodiversity and/or heritage assets and use boundary treatments and screening materials which are sympathetic to the existing urban or rural form;
 - ensure the amenity of the Gypsy and Traveller community and the settled community is managed appropriately in accordance with other Local Plan Policies; and
 - ensure that there is sufficient space for the planned number of pitches, outdoor space, day rooms, parking and the safe movement of personal and commercial vehicles.
9. Where the identified need has been fully met, small extensions to, or intensification of, an existing authorised, well managed site may be supported if there is a need specific to the household on site and the proposal accords with Part 8 of this policy.
10. Any development granted under this policy will be subject to a condition limiting occupancy to Gypsies and Travellers.
11. Proposals which result in the loss of existing authorised Gypsy and Traveller sites/yards and/ or pitches/plots will not be supported unless it can be demonstrated that there is no longer a need for such accommodation on the relevant site.

8. Potential Planning Policy for Accommodating those Households who do Not Meet the Planning Definition or are classified as undetermined for Gypsy and Travellers and Travelling Showpeople

- 8.1. The GTAA has considered the need for other nomadic households and/ or groups that do not meet the planning definition for Gypsies and Travellers, as defined by the Planning Policy for Traveller Sites (PPTS). Housing needs for these groups would be addressed through general housing policies in the Local Plan.
- 8.2. Houseboat moorings are, by their nature, situated along navigable watercourses (e.g. River Great Ouse, River Wissey or Fenland navigations). Proposals for new private moorings would be considered in terms of access to services and facilities by active travel.

Proposed Policy B: Caravans, Park Homes and Houseboats

1. Proposals for the delivery of new caravan pitches or park homes, or extensions to existing caravan or park home sites, will be supported where they are located on sites which would be acceptable for permanent dwellings and satisfy other relevant policies in the Local Plan.
2. Proposals for additional private houseboat moorings should, wherever possible, be situated where local services and facilities are accessible by active travel means.

9. Site Details

9.1. Each site identified for development has an indicative number of pitches/plots that could be delivered during the remaining plan period 2023-2039. The indicative numbers of pitches/plots are used to demonstrate how the Local Plan requirement can be met. It is emphasised that they are only 'indicative', and do not represent a fixed policy target for each individual site.

Proposed Sites for Intensification

These sites are those the Council consider are suitable to accommodate further development.

- GT05 19 - 121 Magdalen Road, Tilney St Lawrence
- GT11 Homefields, (Western Side, Goose Lane), Walpole St Andrew
- GT17 Land at The Lodge, Small Lode, Upwell
- GT18 Land at 2 Primrose Farm, Small Lode, Upwell
- GT20 Land at Botany Bay, Upwell
- GT21 Land at Four Acres, Upwell
- GT28 Many Acres (Smithy's Field), Small Lode, Upwell, Norfolk
- GT34 Land at Creaksville, South Creake
- GT35 Land at Green Acres, Upwell
- GT39 Land at Oak Tree Lodge, The Common, South Creake
- GT42 Land at Red Barn, Cowles Drove, Hockwold cum Wilton
- GT54 Land at the Pines, Whittington
- GT55 Land at Victoria Barns, Basin Road, Outwell
- GT56 Wheatley Bank, Walsoken (South of Worzals parallel to A47)
- GT59 Land at Spriggs Hollow, Walsoken
- GT66 Land at Brandon Road, Methwold

Authorising pitches at:

- GT09 The Stables, Walpole St Andrew
- GT33 Land Next to Clydesdale, Biggs Road, Walsoken
- GT43 Homefield, Common Rd South, Walton Highway
- GT59 Spriggs Hollow

New site at:

- GTRA(B) Land at Station Road, West Dereham
- GTRA(C) Land to the West of Country Park Travellers Site Wheatley Bank, Walsoken

Sites for Travelling Showpeople at:

- GT25 Land at the Oaks, Northwold
- GT62 Land at Redgate Farm, Magdalen Road, Tilney St Lawrence
- GT67 Llamedos – Syderstone

Proposed Sites for Intensification

GT05 19- 121 Magdalen Road, Tilney St Lawrence

Site Name/Settlement	19 - 121 Magdalen Road, Tilney St Lawrence	Site Reference	GT05
Site Capacity	Some remaining capacity	Site Area (Ha)	0.23
Proposed Number of additional pitches/plots	1	Ownership	Private

Is the site suitable?	The site potentially suitable (Exception)
Suitability Comments?	The site has some identified constraints. Due to their being an identified need arising from this site, further work is being undertaken to see if these constraints can be adequately addressed through mitigation.
Planning Status	Authorised

Constraint	Comment
Access to Site	Site has a current access on to an existing highway. Applicant needs to demonstrate that acceptable visibility can be provided.
Accessibility to Local Services and Facilities	Site is within walkable distance to one to three core services within 1200m.
Utilities Capacity	No concerns raised.
Utilities Infrastructure	Has access to a water supply network and has its own septic tank or package treatment plant due to the remote location.
Contamination and Ground Stability	No known issues. The site is unlikely to be contaminated.
Flood Risk	<p>The site is within Flood Zone 2 and/or 3. The screening of sites through the SRFA shows the hazard associated with the undefended Tidal 200-year event with an allowance for climate change, i.e. an indication of the risk to sites if defences were to breach during an extreme event.</p> <p>As this is an existing authorised site where a direct need has arisen through the GTAA 2023, the Council believes that a planning balance needs to be made between meeting this direct need and identifying appropriate mitigation measures to reduce the impact of flood risk to current and future occupiers of the site.</p>
Nationally and Locally Significant Landscapes	Development of the site would have a neutral impact but importantly not have a detrimental impact, on sensitive landscapes or their setting
Townscape	Development of the site would have a neutral impact, but importantly not have a detrimental impact, on townscapes
Biodiversity and Geodiversity	Development of the site would not have a detrimental impact on any designated, protected species or habitat.

Constraint	Comment
Historic Environment	Development of the site would have a neutral impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets.
Open Space / Green Infrastructure	No known issues. The site is not located on an identified open space
Transport and Roads	Direct access to the existing road network. However, any impacts to the network will need mitigating to make sure the site can contribute towards a free flowing and safe road network.
Coastal Change	The site is not adjacent to a Coastal Flood Hazard Zone
Compatibility with Neighbouring/ Adjoining Uses	No Neighbouring or adjoining land use constraints identified.

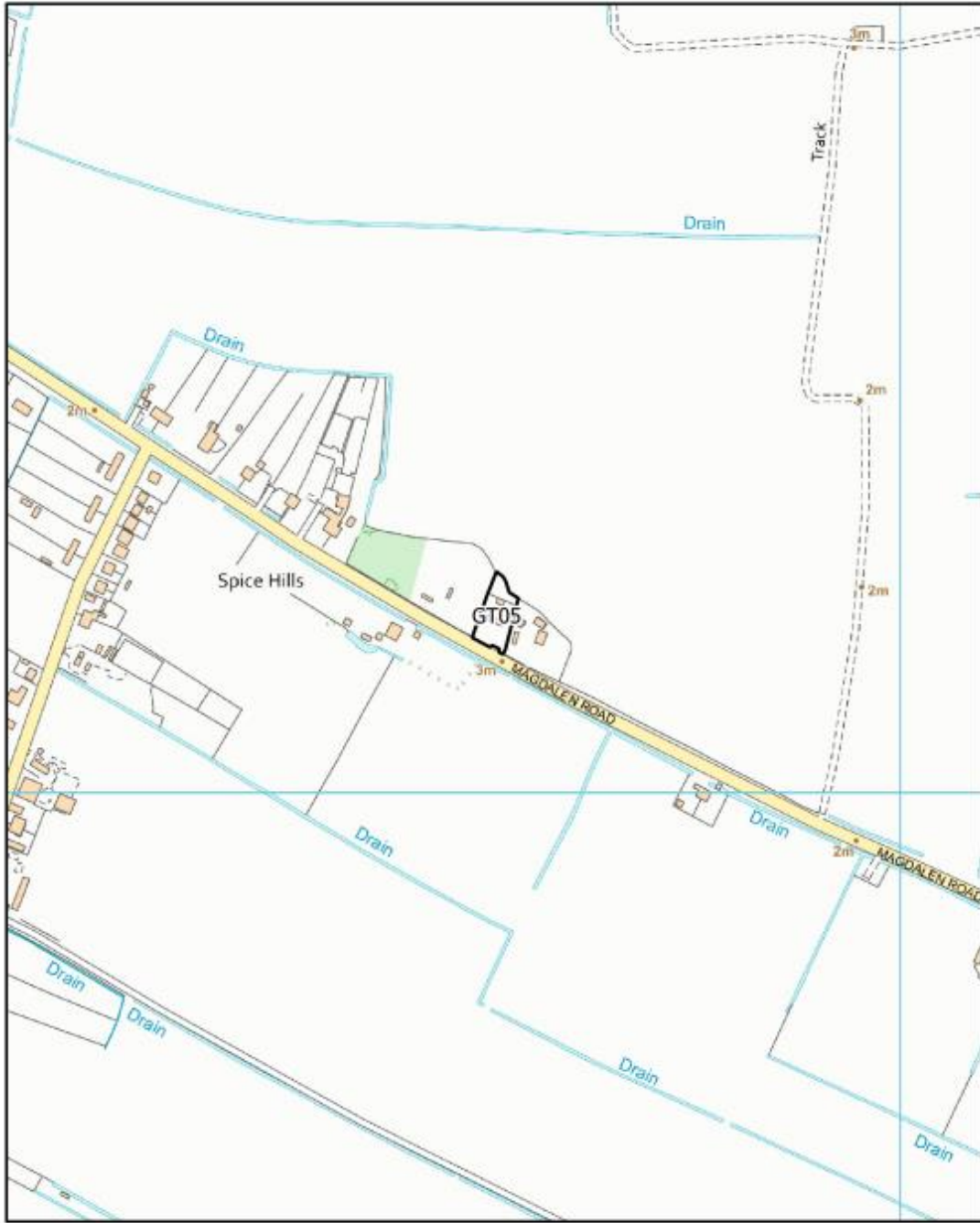
Conclusion

The site has some identified constraints. These include the risk from flooding, highways and its impact on local character and landscape. To investigate these constraints further, the Council commissioned a Strategic Flood Risk Assessment which looked at the sites risk in terms of depth and proximity to established flood defences. Further work is needed to address the existing flooding constraints on the site. If these issues can be adequately addressed by mitigation then the site could be used to accommodate the direct future need.

The highway constraints are limited to the capacity of existing infrastructure. Being rural roads, these are minor, but development here is existent and further growth identified is small in scale and unlikely to lead to any severe impacts to the road network.

In terms of Landscape and townscape the impact is minimal due to this being an existing and established site.

To conclude, the site is considered 'potentially suitable' for development if the existing flooding constraints can be adequately mitigated.



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GT05



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GT11 Homefields, (Western Side, Goose Lane), Walpole St Andrew

Site Name/Settlement	Homefields, (Western Side, Goose Lane), Walpole St Andrew, (Homefield)		Site Reference	GT11
Site Capacity	Some remaining capacity	Site Area (Ha)	0.21	
Proposed Number of additional pitches/plots	1	Ownership	Private	

Is the site suitable?	The site is potentially suitable (Exception)		
Suitability Comments?	The site has some identified constraints. Due to their being an identified need arising from this site, further work is being undertaken to see if these constraints can be adequately addressed through mitigation.		
Planning Status	Authorised		

Suitability Assessment		
Access to Site		Site has a current access on to an existing highway. Applicant needs to demonstrate that acceptable visibility can be provided.
Accessibility to Local Services and Facilities		Site is within walkable distance to one to three core services within 1200m.
Utilities Capacity		No concerns raised
Utilities Infrastructure		Has access to a water supply network and has its own septic tank or package treatment plant due to the remote location.
Contamination and Ground Stability		No known issues. The site is unlikely to be contaminated.
Flood Risk		<p>The site is within Flood Zone 2 and/or 3. The screening of sites through the SRFA shows the hazard associated with the undefended Tidal 200-year event with an allowance for climate change, i.e. an indication of the risk to sites if defences were to breach during an extreme event.</p> <p>As this is an existing authorised site where a direct need has arisen through the GTAA 2023, the Council believes that a planning balance needs to be made between meeting this direct need and identifying appropriate mitigation measures to reduce the impact of flood risk to current and future occupiers of the site.</p>
Nationally and Locally Significant		Development of the site would have a neutral impact, but importantly not have a detrimental impact, on sensitive landscapes or their setting

Suitability Assessment		
Landscapes		
Townscape		Development likely to have some impact on townscape, but can be mitigated through siting and design
Biodiversity and Geodiversity		Development of the site would not have a detrimental impact on any designated, protected species or habitat.
Historic Environment		Development of the site would have a neutral impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets.
Open Space / Green Infrastructure		No known issues. The site is not located on an identified open space
Transport and Roads		Highway is constrained by its current size, but additional pitches could be supported through appropriate mitigation if and where required.
Coastal Change		The site is not adjacent to a Coastal Flood Hazard Zone
Compatibility with Neighbouring/ Adjoining Uses		Near residential dwellings. Development of the site could have issues of compatibility with neighbouring/adjoin uses; however, these could be reasonably mitigated.

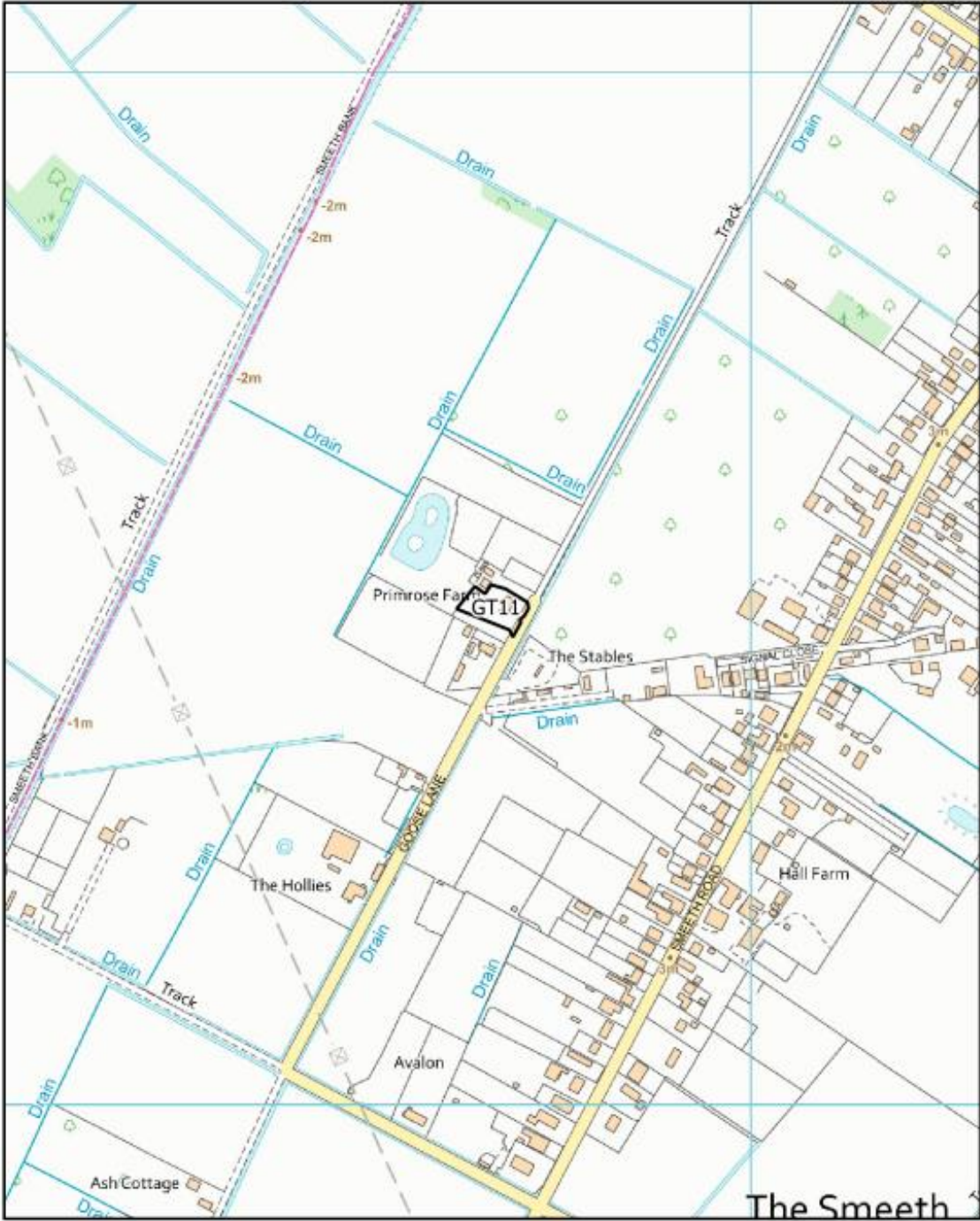
Conclusion

The site has some identified constraints. These include the risk from flooding, highways and its impact on local character and landscape. To investigate these constraints further, the Council commissioned a Strategic Flood Risk Assessment which looked at the sites risk in terms of depth and proximity to established flood defences. Further work is needed to address the existing flooding constraints on the site. If these issues can be adequately addressed by mitigation then the site could be used to accommodate the direct future need.

The highway constraints are limited to the capacity of existing infrastructure. Being rural roads, these are minor, but development here is existent and further growth identified is small in scale and unlikely to lead to any severe impacts to the road network.

In terms of Landscape and townscape the impact is minimal due to this being an existing and established site.

To conclude, the site is considered 'potentially suitable' for development if the existing flooding constraints can be adequately mitigated.



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GT11



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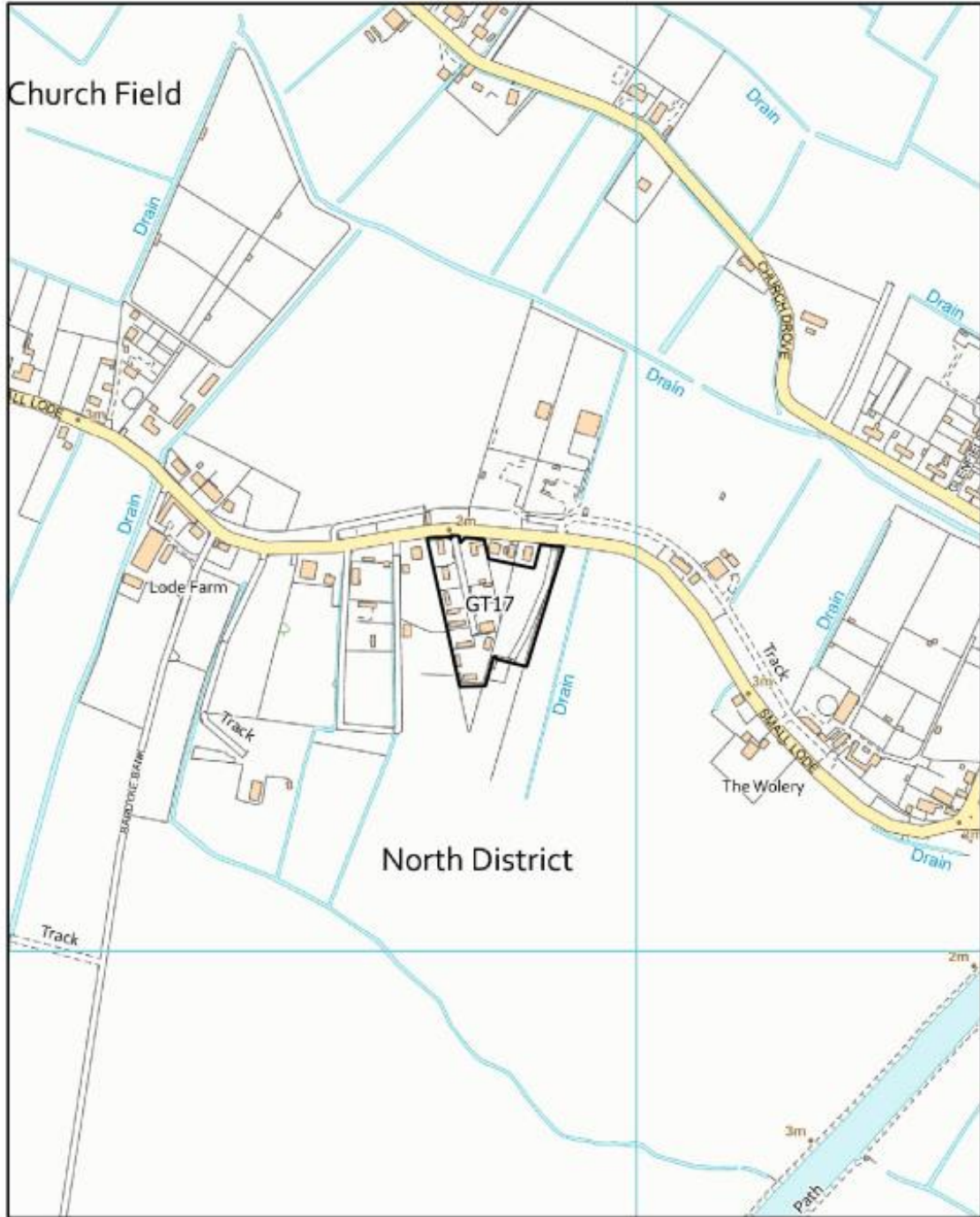
GT17 Land at The Lodge, Small Lode, Upwell

Site Name/Settlement	The Lodge, 196 - 198 Small Lode, Upwell (The Caravan Site)	Site Reference	GT17 and Broad Location
Site Capacity	Limited remaining capacity, but more with Broad Location	Site Area (Ha)	2.23
Proposed Number of additional pitches/plots	13 with Broad Location identified	Ownership	Private

Is the site suitable?	The site is potentially suitable
Suitability Comments?	The site has some identified constraints. Due to their being an identified need arising from this site, further work is being undertaken to see if these constraints can be adequately addressed through mitigation.
Planning Status	Authorised

Constraint	Comment
Access to Site	Site has a current access on to an existing highway. Applicant needs to demonstrate that acceptable visibility can be provided.
Accessibility to Local Services and Facilities	Site is within walkable distance to one to three core services within 1200m.
Utilities Capacity	No concerns raised
Utilities Infrastructure	has access to a water supply network and has its own septic tank or package treatment plant due to the remote location.
Contamination and Ground Stability	No known issues. The site is unlikely to be contaminated.
Flood Risk	The site is within Flood Zone 1 (low risk)
Nationally and Locally Significant Landscapes	Development of the site would have a neutral impact, but importantly not have a detrimental impact, on sensitive landscapes or their setting
Townscape	Development of the site would have a neutral impact, but importantly not have a detrimental impact, on townscapes
Biodiversity and Geodiversity	Development of the site would not have a detrimental impact on any designated, protected species or habitat.
Historic Environment	Development of the site would have a neutral impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets.
Open Space / Green Infrastructure	No known issues. The site is not located on an identified open space
Transport and Roads	Direct access to the existing road network. However, any impacts to the network will need mitigating to make sure the site can contribute towards a free flowing and safe road network.

Constraint	Comment
Coastal Change	The site is not adjacent to a Coastal Flood Hazard Zone
Compatibility with Neighbouring/ Adjoining Uses	No Neighbouring or adjoining land use constraints identified.
Conclusion	
<p>The site has some identified constraints. These include the risk from flooding, highways and its impact on local character and landscape. Although within a low flood risk area, due to its close proximity to nearby higher risk zones, further work is needed to understand the impact to the site in any extreme flooding event. Mitigation measures are likely to be required.</p> <p>The highway constraints are limited to the capacity of existing infrastructure. Being rural roads, these are minor, but development here is existent and further growth identified is unlikely to lead to any severe impacts to the road network. However some mitigation measures may be necessary if the Broad Location is allocated.</p> <p>In terms of Landscape and townscape the impact is minimal due to this being an existing and established site.</p> <p>To conclude, is considered ‘potentially suitable’ for development with some mitigation measures required through the development of the site.</p>	



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GT17



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GT18 Land at 2 Primrose Farm, Small Lode, Upwell

Site Name/Settlement	Primrose Farm, Small Lode, Upwell	Site Reference	GT18 and Broad Location
Site Capacity	Limited remaining capacity, but more with Broad Location	Site Area (Ha)	2.17
Proposed Number of additional pitches/plots	16 with Broad Location identified	Ownership	Private

Is the site suitable?	The site is potentially suitable
Suitability Comments?	The site has some identified constraints. Due to their being an identified need arising from this site, further work is being undertaken to see if these constraints can be adequately addressed through mitigation.
Planning Status	Authorised and unauthorised

Constraint	Comment
Access to Site	Site has a current access on to an existing highway. Applicant needs to demonstrate that acceptable visibility can be provided.
Accessibility to Local Services and Facilities	Site is within walkable distance to one to three core services within 1200m.
Utilities Capacity	No concerns raised
Utilities Infrastructure	has access to a water supply network and has its own septic tank or package treatment plant due to the remote location.
Contamination and Ground Stability	No known issues. The site is unlikely to be contaminated.
Flood Risk	<p>The frontage of the site is within Flood Zone 1. The remainder of the site is within Flood Zone 2 and/or 3. The screening of sites through the SRFA shows the hazard associated with the undefended Tidal 200-year event with an allowance for climate change, i.e. an indication of the risk to sites if defences were to breach during an extreme event.</p> <p>As this is an existing authorised site where a direct need has arisen through the GTAA 2023, the Council believes that a planning balance needs to be made between meeting this direct need and identifying appropriate mitigation measures to reduce the impact of flood risk to current and future occupiers of the site</p>
Nationally and Locally Significant Landscapes	Development of the site would have a neutral impact but importantly not have a detrimental impact, on sensitive landscapes or their setting
Townscape	Development of the site would have a neutral impact, but importantly not have a detrimental impact, on townscapes
Biodiversity and Geodiversity	Development of the site would not have a detrimental impact on any designated, protected species or habitat.

Constraint	Comment
Historic Environment	Development of the site would have a neutral impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets.
Open Space / Green Infrastructure	No known issues. The site is not located on an identified open space
Transport and Roads	Direct access to the existing road network. However, any impacts to the network will need mitigating to make sure the site can contribute towards a free flowing and safe road network.
Coastal Change	The site is not adjacent to a Coastal Flood Hazard Zone
Compatibility with Neighbouring/ Adjoining Uses	No Neighbouring or adjoining land use constraints identified.

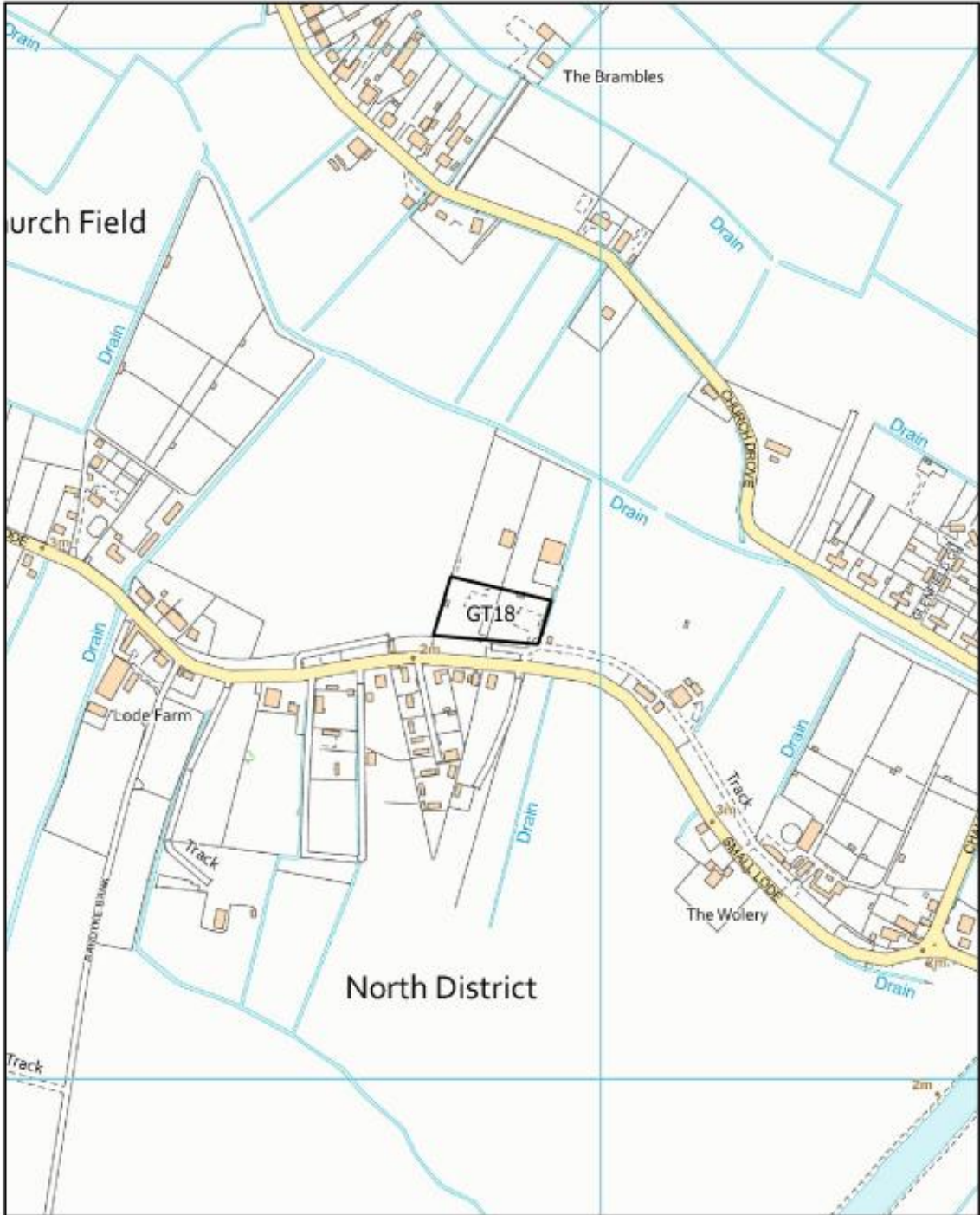
Conclusion

The site has some identified constraints. These include the risk from flooding, highways and its impact on local character and landscape. To investigate these constraints further, the Council commissioned a Strategic Flood Risk Assessment which looked at the sites risk in terms of depth and proximity to established flood defences. This highlights that the site is considered 'a medium risk to life' in terms of potential flooding volume and depth. The frontage of the site is likely suitable where there is a low risk from flooding. Mitigation would be required here due to its close proximity to the higher risk flood zone. Further work is needed to address the existing flooding constraints on the site. If these issues can be adequately addressed by mitigation then the site could be used to accommodate the direct future need.

The highway constraints are limited to the capacity of existing infrastructure. Being rural roads, these are minor, but development here is existent and further growth identified is small in scale and unlikely to lead to any severe impacts to the road network. However some mitigation measures may be necessary if the Broad Location is allocated.

In terms of Landscape and townscape the impact is minimal due to this being an existing and established site.

To conclude, that part of the site is considered 'potentially suitable' for development with some mitigation measures.



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GT18



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GT20 Land at Botany Bay, Upwell

Site Name/Settlement	Botany Bay, Stonehouse Road, Upwell	Site Reference	GT20
Site Capacity	Some remaining capacity	Site Area (Ha)	0.19
Proposed Number of additional pitches/plots	1	Ownership	Private

Is the site suitable?	The site is suitable
Suitability Comments?	There are some constraints but these are likely to be addressed by adequate mitigation measures.
Planning Status	Authorised

Constraint	Comment
Access to Site	Site has a current access on to an existing highway. Applicant needs to demonstrate that acceptable visibility can be provided.
Accessibility to Local Services and Facilities	Site is within walkable distance to one to three core services within 1200m.
Utilities Capacity	No concerns raised
Utilities Infrastructure	has access to a water supply network and has its own septic tank or package treatment plant due to the remote location.
Contamination and Ground Stability	No known issues. The site is unlikely to be contaminated.
Flood Risk	The site is within Flood Zone 1 (low risk)
Nationally and Locally Significant Landscapes	Development of the site would have a neutral impact but importantly not have a detrimental impact, on sensitive landscapes or their setting
Townscape	Development likely to have some impact on townscape, but can be mitigated through siting and design
Biodiversity and Geodiversity	Development of the site would not have a detrimental impact on any designated, protected species or habitat.
Historic Environment	Development of the site would have a neutral impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets.
Open Space / Green Infrastructure	No known issues. The site is not located on an identified open space
Transport and Roads	Direct access to the existing road network. However, any impacts to the network will need mitigating to make sure the site can contribute towards a free flowing and safe road network.
Coastal Change	The site is not adjacent to a Coastal Flood Hazard Zone
Compatibility with Neighbouring/	No Neighbouring or adjoining land use constraints identified.

Constraint	Comment
Adjoining Uses	

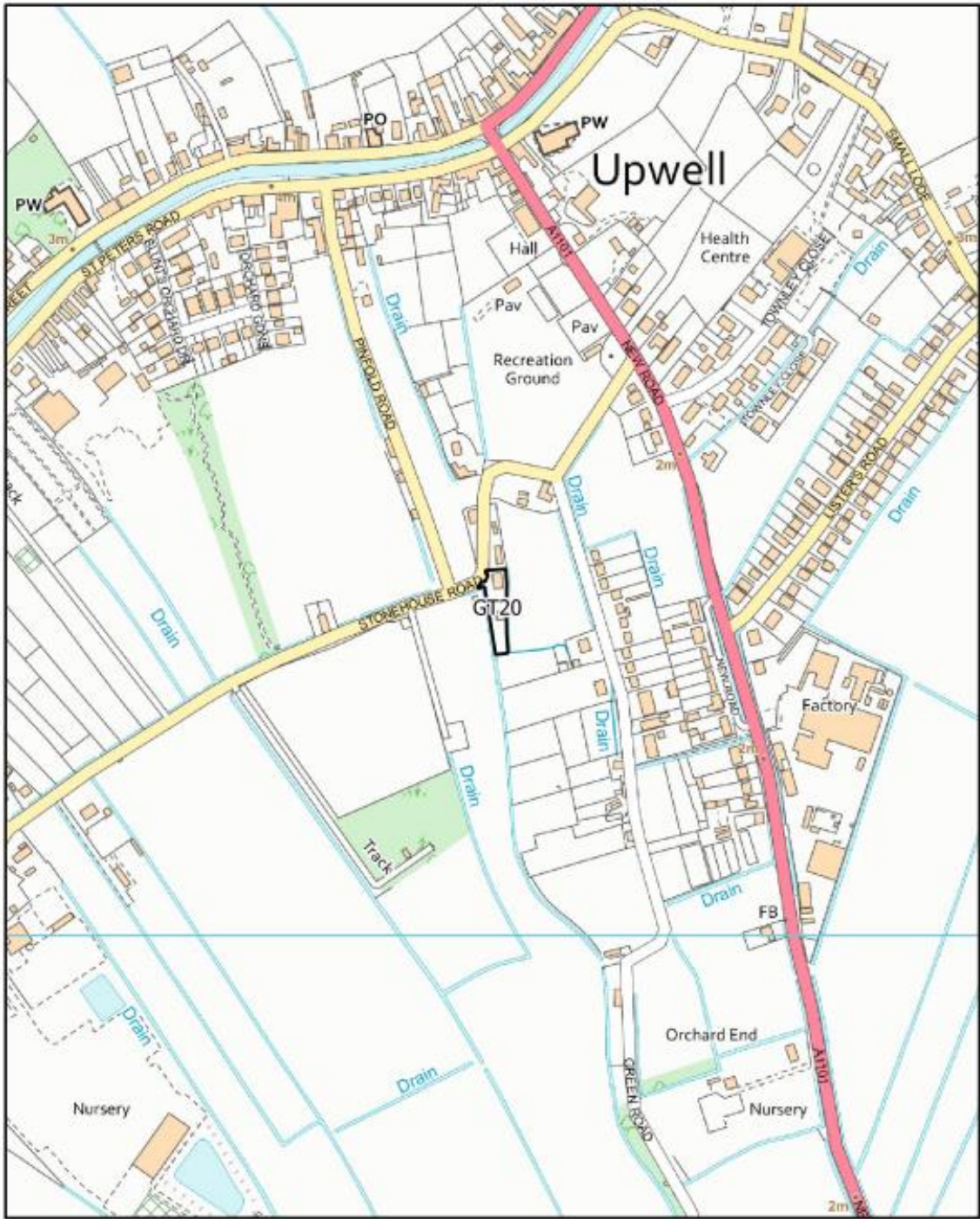
Conclusion

The site has some identified constraints. These include the risk from flooding, highways and its impact on local character and landscape. To investigate these constraints further, the Council commissioned a Strategic Flood Risk Assessment which looked at the sites risk in terms of depth and proximity to established flood defences. This highlights that the site is considered ‘a low risk to life’ in terms of potential flooding volume and depth.

The highway constraints are limited to the capacity of existing infrastructure. Being rural roads, these are minor, but development here is existent and further growth identified is small in scale and unlikely to lead to any severe impacts to the road network.

In terms of Landscape and townscape the impact is minimal due to this being an existing and established site.

To conclude, the site is considered ‘suitable’ for development with some mitigation measures.



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GT20



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GT21 Land at Four Acres, Upwell

Site Name/Settlement	Four Acres, March Riverside, Upwell	Site Reference	GT21
Site Capacity	Some remaining capacity	Site Area (Ha)	01.49
Proposed Number of additional pitches/plots	5 with Broad Location identified	Ownership	Private

Is the site suitable?	The site is potentially suitable
Suitability Comments?	The site has some identified constraints. Due to their being an identified need arising from this site, further work is being undertaken to see if these constraints can be adequately addressed through mitigation.
Planning Status	Authorised

Constraint	Comment
Access to Site	Site has a current access on to an existing highway. Applicant needs to demonstrate that acceptable visibility can be provided.
Accessibility to Local Services and Facilities	No core services within 800m/10 minutes walking distance.
Utilities Capacity	No concerns raised
Utilities Infrastructure	has access to a water supply network and has its own septic tank or package treatment plant due to the remote location.
Contamination and Ground Stability	No known issues. The site is unlikely to be contaminated.
Flood Risk	<p>The site is within Flood Zone 2 and/or 3. The screening of sites through the SRFA shows the hazard associated with the undefended Tidal 200-year event with an allowance for climate change, i.e. an indication of the risk to sites if defences were to breach during an extreme event.</p> <p>As this is an existing authorised site where a direct need has arisen through the GTAA 2023, the Council believes that a planning balance needs to be made between meeting this direct need and identifying appropriate mitigation measures to reduce the impact of flood risk to current and future occupiers of the site.</p>
Nationally and Locally Significant Landscapes	Development of the site would have a neutral impact but importantly not have a detrimental impact, on sensitive landscapes or their setting
Townscape	Development likely to have some impact on townscape, but can be mitigated through siting and design
Biodiversity and Geodiversity	Development of the site would not have a detrimental impact on any designated, protected species or habitat.

Constraint	Comment
Historic Environment	Development of the site would have a neutral impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets.
Open Space / Green Infrastructure	No known issues. The site is not located on an identified open space
Transport and Roads	Direct access to the existing road network. However, any impacts to the network will need mitigating to make sure the site can contribute towards a free flowing and safe road network.
Coastal Change	The site is not adjacent to a Coastal Flood Hazard Zone
Compatibility with Neighbouring/ Adjoining Uses	Near residential dwellings. Development of the site could have issues of compatibility with neighbouring/adjoin uses; however, these could be reasonably mitigated.

Conclusion

The site has some identified constraints. These include the risk from flooding, highways and its impact on local character and landscape. To investigate these constraints further, the Council commissioned a Strategic Flood Risk Assessment which looked at the sites risk in terms of depth and proximity to established flood defences. Further work is needed to address the existing flooding constraints on the site. If these issues can be adequately addressed by mitigation then the site could be used to accommodate the direct future need.

The highway constraints are limited to the capacity of existing infrastructure. Being rural roads, these are minor, but development here is existent and further growth identified is small in scale and unlikely to lead to any severe impacts to the road network.

In terms of Landscape and townscape the impact is minimal due to this being an existing and established site.

To conclude, the site is considered 'likely suitable' for development with some mitigation measures.



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GT21



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28/07/23

GT28 Many Acres (Smithy's Field), Small Lode, Upwell, Norfolk

Site Name/Settlement	Many Acres (Smithy's Field), Small Lode, Upwell, Norfolk	Site Reference	GT28
Site Capacity	Some remaining capacity	Site Area (Ha)	0.36
Proposed Number of additional pitches/plots	2	Ownership	Private

Is the site suitable?	The site is potentially suitable
Suitability Comments?	The site has some identified constraints. Due to their being an identified need arising from this site, further work is being undertaken to see if these constraints can be adequately addressed through mitigation.
Planning Status	Authorised

Constraint	Comment
Access to Site	Site has a current access on to an existing highway
Accessibility to Local Services and Facilities	Site is within walkable distance to one to three core services within 1200m.
Utilities Capacity	No concerns raised
Utilities Infrastructure	has access to a water supply network and has its own septic tank or package treatment plant due to the remote location.
Contamination and Ground Stability	No known issues. The site is unlikely to be contaminated.
Flood Risk	The site is within Flood Zone 1 (low risk)
Nationally and Locally Significant Landscapes	Development of the site would have a neutral impact but importantly not have a detrimental impact, on sensitive landscapes or their setting
Townscape	Development of the site would have a neutral impact, but importantly not have a detrimental impact, on townscapes.
Biodiversity and Geodiversity	Development of the site would not have a detrimental impact on any designated, protected species or habitat.
Historic Environment	Development of the site would have a neutral impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets.
Open Space / Green Infrastructure	No known issues. The site is not located on an identified open space
Transport and Roads	Direct access to the existing road network. However, any impacts to the network will need mitigating to make sure the site can contribute towards a free flowing and safe road network.
Coastal Change	The site is not adjacent to a Coastal Flood Hazard Zone

Constraint	Comment
Compatibility with Neighbouring/ Adjoining Uses	No Neighbouring or adjoining land use constraints identified.

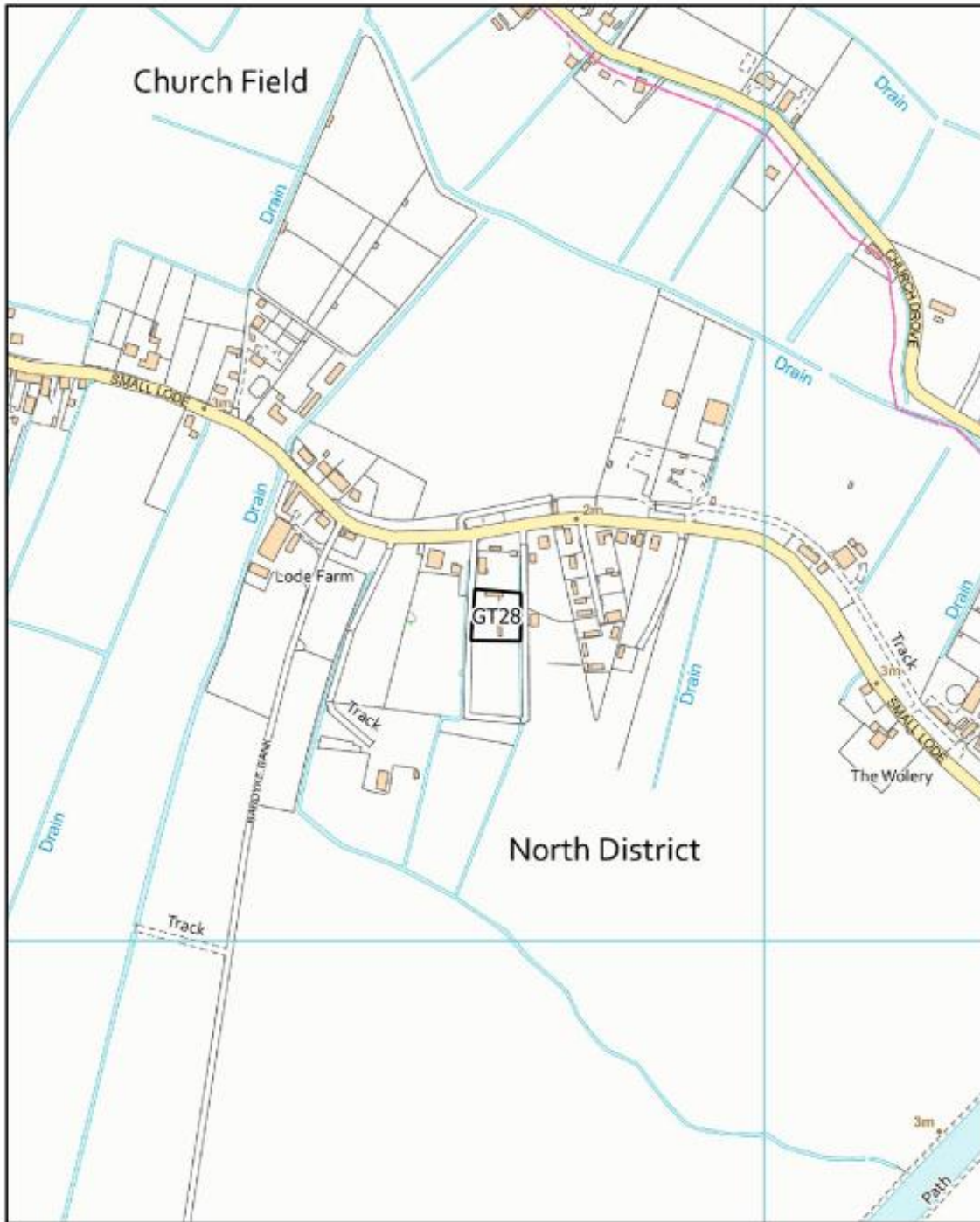
Conclusion

The site has some identified constraints. These include the risk from flooding, highways and its impact on local character and landscape. To investigate these constraints further, the Council commissioned a Strategic Flood Risk Assessment which looked at the sites risk in terms of depth and proximity to established flood defences. This highlights that the site is considered 'a low risk to life' in terms of potential flooding volume and depth.

The highway constraints are limited to the capacity of existing infrastructure. Being rural roads, these are minor, but development here is existent and further growth identified is small in scale and unlikely to lead to any severe impacts to the road network.

In terms of Landscape and townscape the impact is minimal due to this being an existing and established site.

To conclude, the site is considered 'potentially suitable' for development with some mitigation measures.



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GT28



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GT34 Land at Creakesville, South Creake

Site Name/Settlement	Creakesville, The Common, South Creake, Fakenham	Site Reference	GT34
Site Capacity	Some remaining capacity	Site Area (Ha)	0.41
Proposed Number of additional pitches/plots	1	Ownership	Private

Is the site suitable?	The site is suitable
Suitability Comments?	The site has very few identified constraints.
Planning Status	Authorised

Constraint	Comment
Access to Site	Site has a current access on to an existing highway
Accessibility to Local Services and Facilities	No core services within 800m/10 minutes walking distance.
Utilities Capacity	No concerns raised
Utilities Infrastructure	has access to a water supply network and has its own septic tank or package treatment plant due to the remote location.
Contamination and Ground Stability	No known issues. The site is unlikely to be contaminated.
Flood Risk	The site is within Flood Zone 1 (low risk)
Nationally and Locally Significant Landscapes	Development of the site would have a neutral impact but importantly not have a detrimental impact, on sensitive landscapes or their setting
Townscape	Development likely to have some impact on townscape, but can be mitigated through siting and design
Biodiversity and Geodiversity	Development of the site would not have a detrimental impact on any designated, protected species or habitat.
Historic Environment	Development of the site would have a neutral impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets.
Open Space / Green Infrastructure	No known issues. The site is not located on an identified open space
Transport and Roads	Not abundantly clear how site is/will be accessed, assuming this will be via restricted byway, this should be widened to 4.8m and surfaced for 10m from the B1355 to enable accessing vehicles to pass. Cutting of adjacent hedges will be required to achieve acceptable visibility. No facilities for off-carriageway walking / cycling.
Coastal Change	The site is not adjacent to a Coastal Flood Hazard Zone
Compatibility with	Near residential dwellings. Development of the site could have issues of compatibility with

Constraint	Comment
Neighbouring/ Adjoining Uses	neighbouring/adjoin uses; however, these could be reasonably mitigated.

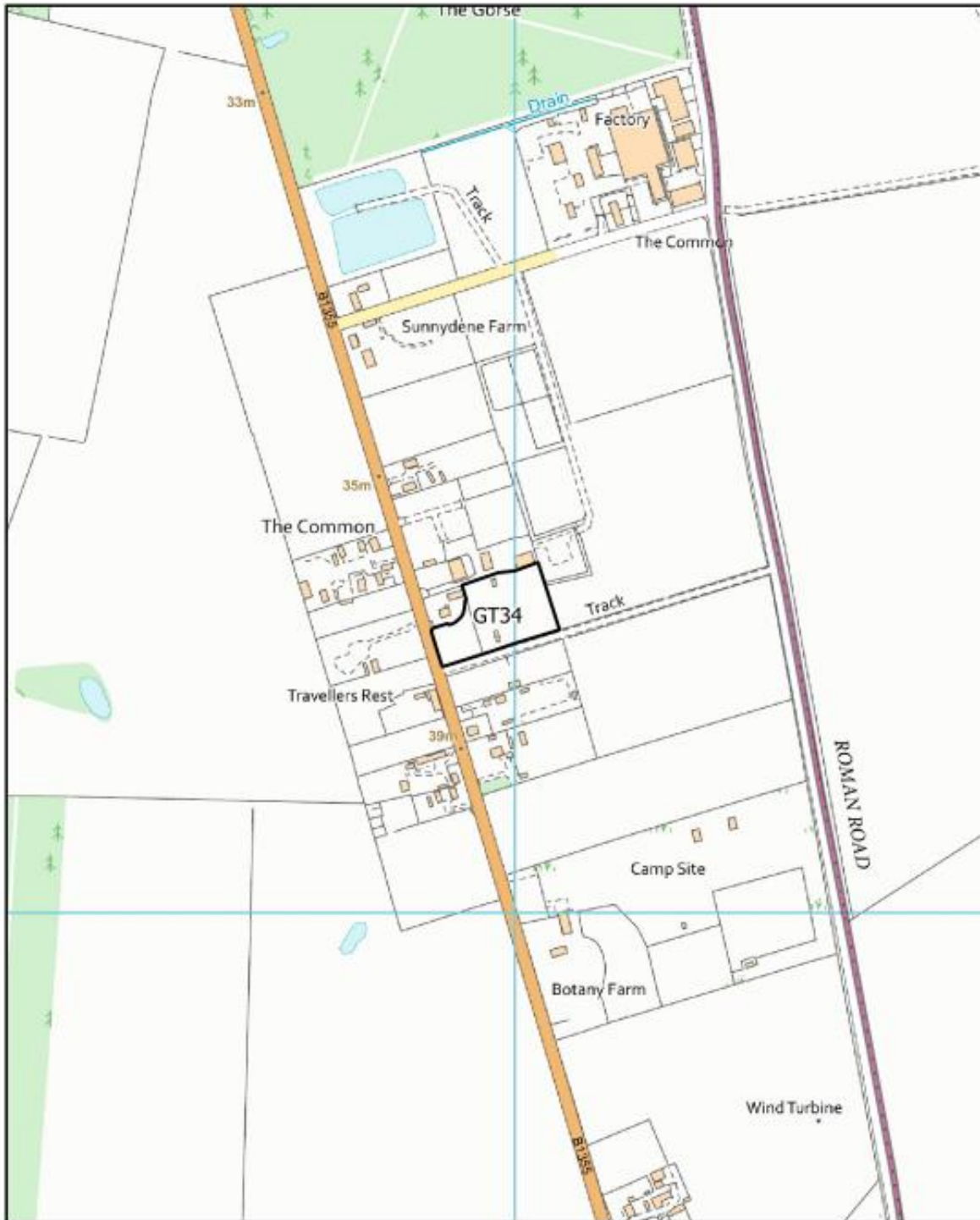
Conclusion

The site has some identified constraints. These include the risk from flooding, highways and its impact on local character and landscape. To investigate these constraints further, the Council commissioned a Strategic Flood Risk Assessment which looked at the sites risk in terms of depth and proximity to established flood defences. This highlights that the site is considered ‘a low risk to life’ in terms of potential flooding volume and depth.

The highway constraints are limited to the capacity of existing infrastructure. Being rural roads, these are minor, but development here is existent and further growth identified is small in scale and unlikely to lead to any severe impacts to the road network.

In terms of Landscape and townscape the impact is minimal due to this being an existing and established site.

To conclude, the site is considered ‘likely suitable’ for development with some mitigation measures.



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GT34



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GT35 Land at Green Acres, Upwell

Site Name/Settlement	Green Acres, 184 Small Lode, Upwell	Site Reference	GT35
Site Capacity	Some remaining capacity	Site Area (Ha)	0.39
Proposed Number of additional pitches/plots	2	Ownership	Private

Is the site suitable?	The site is potentially suitable
Suitability Comments?	The site very few identified constraints that could be overcome through mitigation.
Planning Status	Authorised

Constraint	Comment
Access to Site	Site has a current access on to an existing highway
Accessibility to Local Services and Facilities	Site is within walkable distance to one to three core services within 1200m.
Utilities Capacity	No concerns raised
Utilities Infrastructure	has access to a water supply network and has its own septic tank or package treatment plant due to the remote location.
Contamination and Ground Stability	No known issues. The site is unlikely to be contaminated.
Flood Risk	The site is within Flood Zone 1 (low risk)
Nationally and Locally Significant Landscapes	Development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact, on sensitive landscapes or their setting
Townscape	Development of the site would have a neutral impact, but importantly not have a detrimental impact, on townscapes.
Biodiversity and Geodiversity	Development of the site would not have a detrimental impact on any designated, protected species or habitat.
Historic Environment	Development of the site would have a neutral impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets.
Open Space / Green Infrastructure	No known issues. The site is not located on an identified open space
Transport and Roads	Direct access to the existing road network. However, any impacts to the network will need mitigating to make sure the site can contribute towards a free flowing and safe road network.
Coastal Change	The site is not adjacent to a Coastal Flood Hazard Zone
Compatibility with Neighbouring/ Adjoining Uses	No Neighbouring or adjoining land use constraints identified.

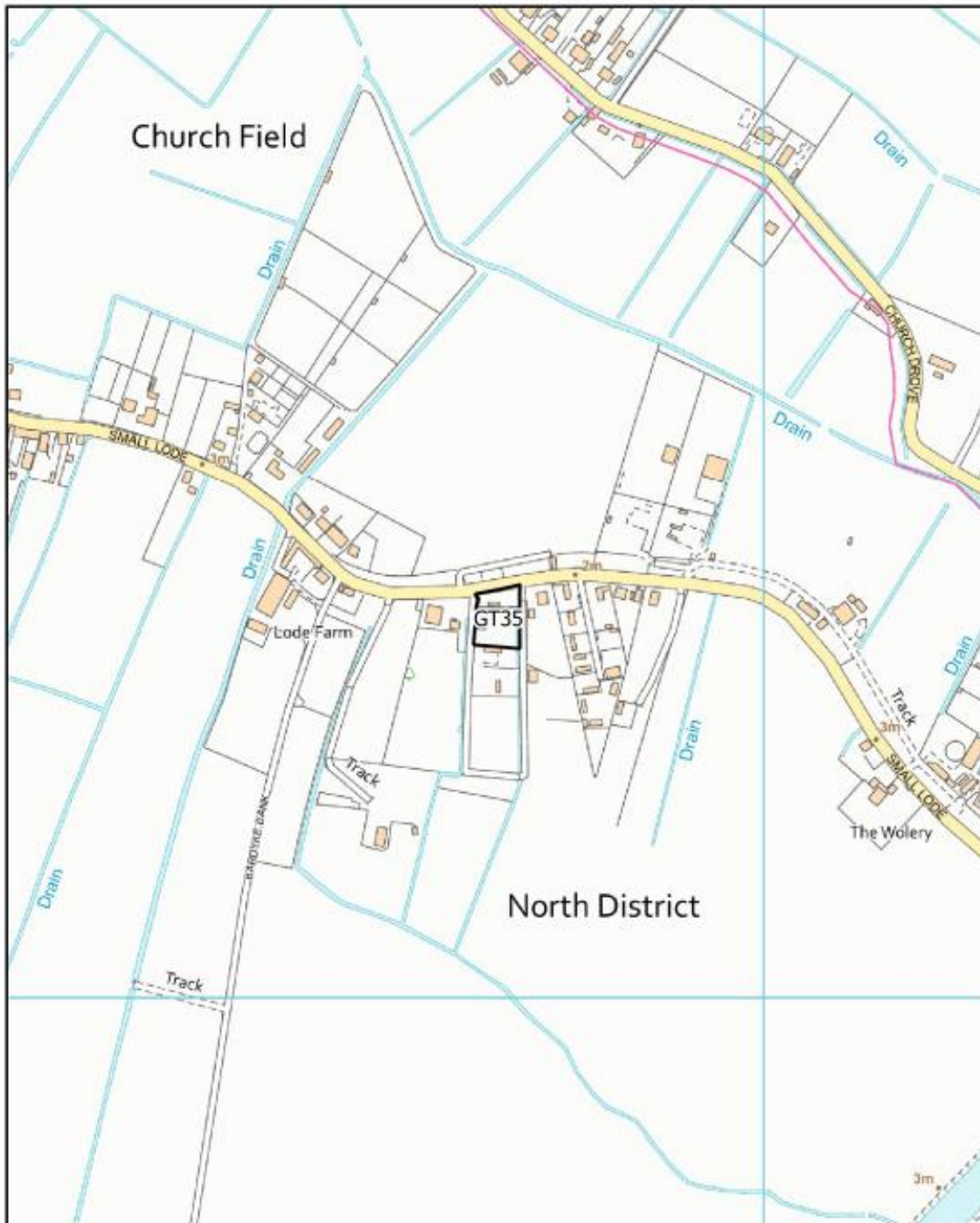
Conclusion

The site has some identified constraints. These include the risk from flooding, highways and its impact on local character and landscape. To investigate these constraints further, the Council commissioned a Strategic Flood Risk Assessment which looked at the sites risk in terms of depth and proximity to established flood defences. This highlights that the site is considered 'a low risk to life' in terms of potential flooding volume and depth.

The highway constraints are limited to the capacity of existing infrastructure. Being rural roads, these are minor, but development here is existent and further growth identified is small in scale and unlikely to lead to any severe impacts to the road network.

In terms of Landscape and townscape the impact is minimal due to this being an existing and established site.

To conclude, the site is considered 'potentially suitable' for development with some mitigation measures.



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GT35



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GT39 Land at Oak Tree Lodge, The Common, South Creake

Site Name/Settlement	Oak Tree Caravan, South Creake	Site Reference	GT39
Site Capacity	Some remaining capacity	Site Area (Ha)	
Proposed Number of additional pitches/plots	3	Ownership	Private

Is the site suitable?	The site is suitable
Suitability Comments?	The site some identified constraints that could be overcome through mitigation.
Planning Status	Authorised

Constraint	Comment
Access to Site	Site has a current access on to an existing highway
Accessibility to Local Services and Facilities	No core services within 800m/10 minutes walking distance.
Utilities Capacity	No concerns raised
Utilities Infrastructure	has access to a water supply network and has its own septic tank or package treatment plant due to the remote location.
Contamination and Ground Stability	No known issues. The site is unlikely to be contaminated.
Flood Risk	The site is within Flood Zone 1 (low risk)
Nationally and Locally Significant Landscapes	Development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact, on sensitive landscapes or their setting
Townscape	Development of the site would have a neutral impact, but importantly not have a detrimental impact, on townscapes
Biodiversity and Geodiversity	Development of the site would not have a detrimental impact on any designated, protected species or habitat.
Historic Environment	Development of the site would have a neutral impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets.
Open Space / Green Infrastructure	No known issues. The site is not located on an identified open space
Transport and Roads	Direct access to the existing road network. However, any impacts to the network will need mitigating to make sure the site can contribute towards a free flowing and safe road network.
Coastal Change	The site is not adjacent to a Coastal Flood Hazard Zone
Compatibility with Neighbouring/ Adjoining Uses	No Neighbouring or adjoining land use constraints identified.

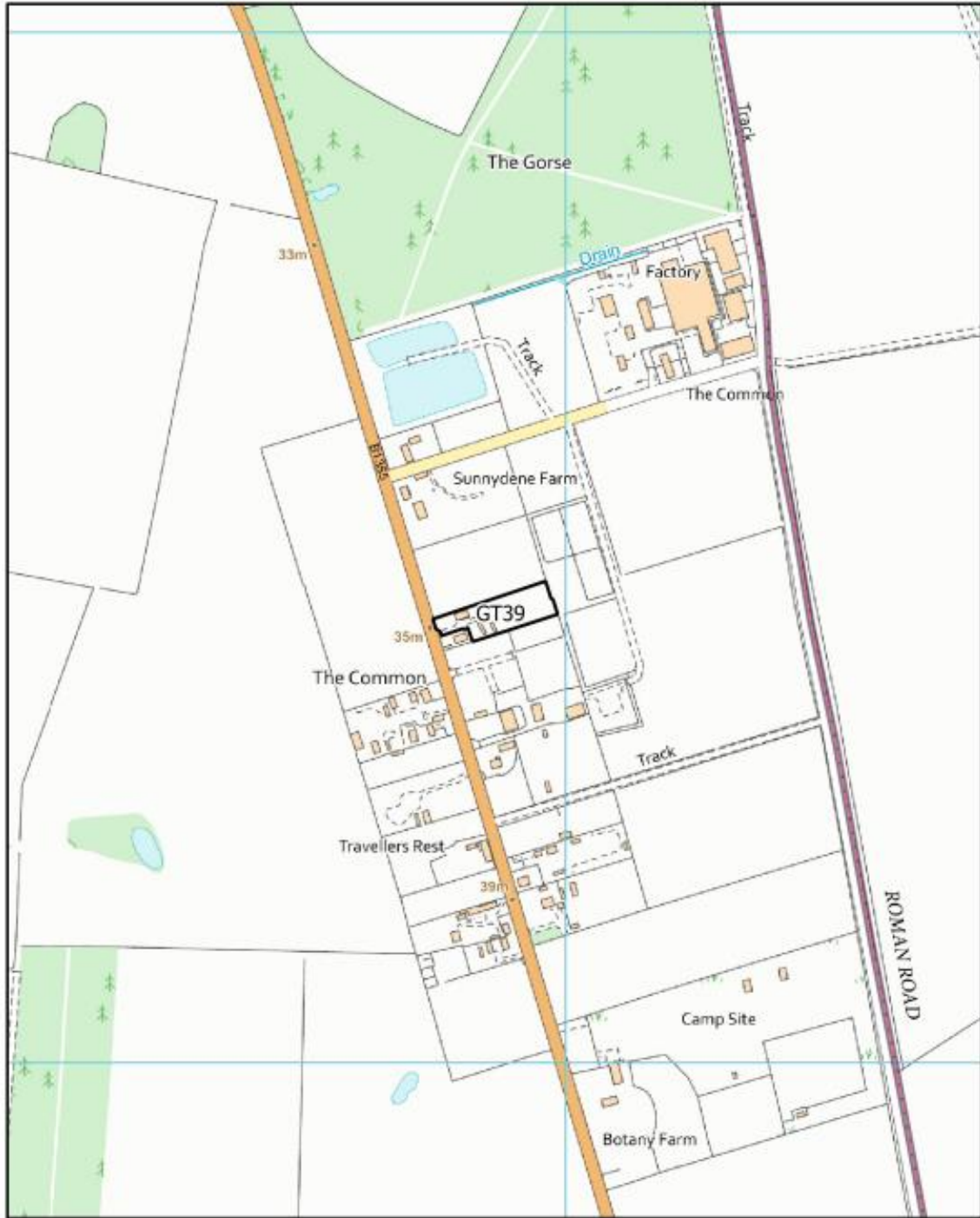
Conclusion

The site has some identified constraints. These include the risk from flooding, highways and its impact on local character and landscape. To investigate these constraints further, the Council commissioned a Strategic Flood Risk Assessment which looked at the sites risk in terms of depth and proximity to established flood defences. This highlights that the site is considered 'a low risk to life' in terms of potential flooding volume and depth.

The highway constraints are limited to the capacity of existing infrastructure. Being rural roads, these are minor, but development here is existent and further growth identified is small in scale and unlikely to lead to any severe impacts to the road network.

In terms of Landscape and townscape the impact is minimal due to this being an existing and established site.

To conclude, the site is considered 'suitable' for development with some mitigation measures.



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GT39



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GT42 Land at Red Barn, Cowles Drove, Hockwold cum Wilton

Site Name/Settlement	Red Barn, Cowles Drove, Hockwold cum Wilton	Site Reference	GT42
Site Capacity	Some remaining capacity	Site Area (Ha)	0.43
Proposed Number of additional pitches/plots	3	Ownership	Private

Is the site suitable?	The site is potentially suitable
Suitability Comments?	The site some identified constraints that could be overcome through mitigation.
Planning Status	Authorised

Constraint	Comment
Access to Site	Site has a current access on to an existing highway
Accessibility to Local Services and Facilities	No core services within 800m/10 minutes walking distance.
Utilities Capacity	No concerns raised
Utilities Infrastructure	has access to a water supply network and has its own septic tank or package treatment plant due to the remote location.
Contamination and Ground Stability	No known issues. The site is unlikely to be contaminated.
Flood Risk	Flood Zone 1 (low risk)
Nationally and Locally Significant Landscapes	Development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact, on sensitive landscapes or their setting
Townscape	Development of the site would have a neutral impact, but importantly not have a detrimental impact, on townscapes
Biodiversity and Geodiversity	The site is located within the SPA buffer
Historic Environment	Development of the site would have a neutral impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets.
Open Space / Green Infrastructure	No known issues. The site is not located on an identified open space
Transport and Roads	Direct access to the existing road network. However, any impacts to the network will need mitigating to make sure the site can contribute towards a free flowing and safe road network.
Coastal Change	The site is not adjacent to a Coastal Flood Hazard Zone
Compatibility with Neighbouring/ Adjoining Uses	No Neighbouring or adjoining land use constraints identified.

Conclusion

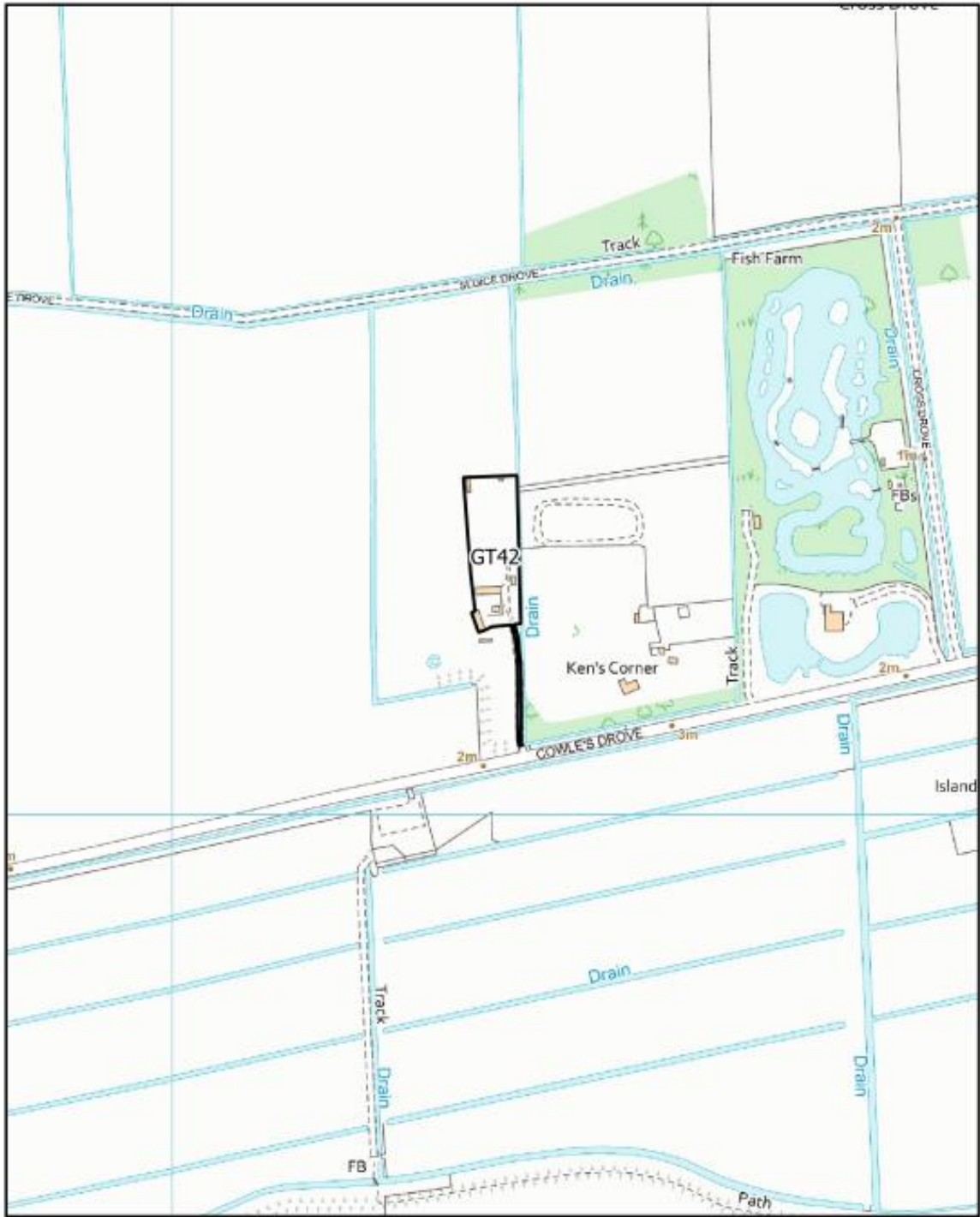
The site has some identified constraints. These include the risk from flooding, highways and its impact on local character and landscape. To investigate these constraints further, the Council commissioned a Strategic Flood Risk Assessment which looked at the sites risk in terms of depth and proximity to established flood defences. This highlights that the site is considered 'a low risk to life' in terms of potential flooding volume and depth.

In terms of Landscape and townscape the impact is minimal due to this being an existing and established site.

Biodiversity impacts are likely as the site is situated within the buffer zone for the **SPA** Mitigation measures may be required to reduce any identified impact.

The highway constraints are limited to the capacity of existing infrastructure. Being rural roads, these are minor, but development here is existent and further growth identified is small in scale and unlikely to lead to any severe impacts to the road network.

To conclude, the site is considered 'potentially suitable' for development.



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GT42



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GT54 Land at the Pines, Whittington

Site Name/Settlement	The Pines, Methwold Road, Whittington	Site Reference	GT54
Site Capacity	Some remaining capacity	Site Area (Ha)	0.19
Proposed Number of additional pitches/plots	1	Ownership	Private

Is the site suitable?	The site is potentially suitable
Suitability Comments?	The site some identified constraints that could be overcome through mitigation.
Planning Status	Authorised

Constraint	Comment
Access to Site	Site has a current access on to an existing highway
Accessibility to Local Services and Facilities	No core services within 800m/10 minutes walking distance.
Utilities Capacity	No concerns raised
Utilities Infrastructure	has access to a water supply network and has its own septic tank or package treatment plant due to the remote location.
Contamination and Ground Stability	No known issues. The site is unlikely to be contaminated.
Flood Risk	The site is within Flood Zone 1 (low risk)
Nationally and Locally Significant Landscapes	Development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact, on sensitive landscapes or their setting
Townscape	Development of the site would have a neutral impact, but importantly not have a detrimental impact, on townscapes
Biodiversity and Geodiversity	Development of the site would not have a detrimental impact on any designated, protected species or habitat.
Historic Environment	Development of the site would have a neutral impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets.
Open Space / Green Infrastructure	No known issues. The site is not located on an identified open space
Transport and Roads	Highway is constrained by its current size, but additional pitches could be supported through appropriate mitigation if and where required.
Coastal Change	The site is not adjacent to a Coastal Flood Hazard Zone
Compatibility with Neighbouring/ Adjoining Uses	No Neighbouring or adjoining land use constraints identified.

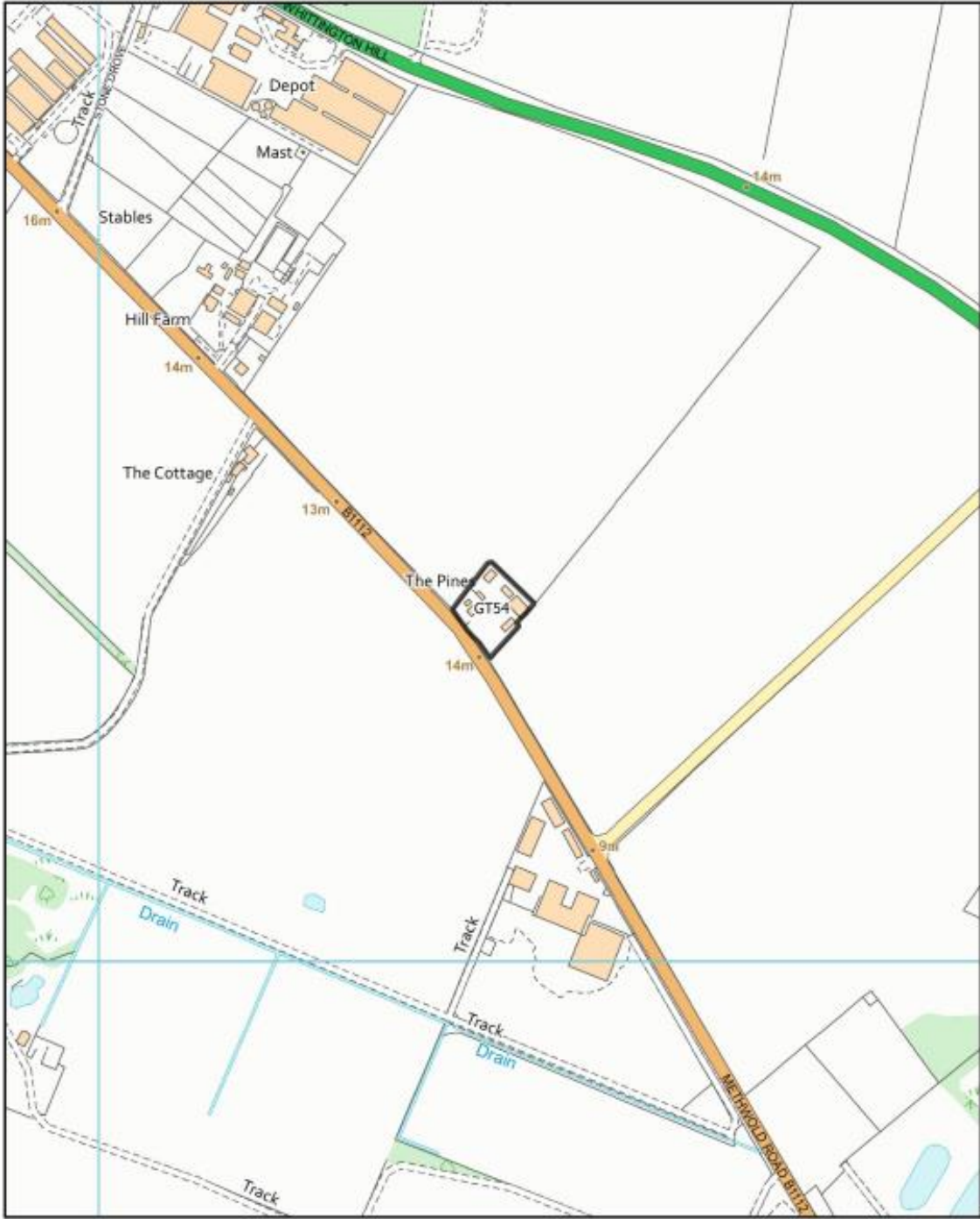
Conclusion

The site has some identified constraints. These include the risk from flooding, highways and its impact on local character and landscape. To investigate these constraints further, the Council commissioned a Strategic Flood Risk Assessment which looked at the sites risk in terms of depth and proximity to established flood defences. This highlights that the site is considered 'a low risk to life' in terms of potential flooding volume and depth.

The highway constraints are limited to the capacity of existing infrastructure. Being rural roads, these are minor, but development here is existent and further growth identified is small in scale and unlikely to lead to any severe impacts to the road network.

In terms of Landscape and townscape the impact is minimal due to this being an existing and established site.

To conclude, the site is considered 'potentially suitable' for development with some mitigation.



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GT54



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28/07/23

GT55 Land at Victoria Barns, Basin Road, Outwell

Site Name/Settlement	Victoria Barn, Land East of Basin Farm, Basin Road, Outwell	Site Reference	GT55
Site Capacity	Some remaining capacity	Site Area (Ha)	0.13
Proposed Number of additional pitches/plots	1	Ownership	Private

Is the site suitable?	The site is potentially suitable
Suitability Comments?	The site has very few identified constraints that could be overcome through mitigation.
Planning Status	Authorised

Constraint	Comment
Access to Site	Site has a current access on to an existing highway
Accessibility to Local Services and Facilities	Site is within walkable distance to one to three core services within 1200m.
Utilities Capacity	No concerns raised
Utilities Infrastructure	has access to a water supply network and has its own septic tank or package treatment plant due to the remote location.
Contamination and Ground Stability	No known issues. The site is unlikely to be contaminated.
Flood Risk	The site is within Flood Zone 1 (low risk)
Nationally and Locally Significant Landscapes	Development of the site would have a neutral impact but importantly not have a detrimental impact, on sensitive landscapes or their setting
Townscape	Development of the site would have a neutral impact, but importantly not have a detrimental impact, on townscapes
Biodiversity and Geodiversity	Development of the site would not have a detrimental impact on any designated, protected species or habitat.
Historic Environment	Development of the site would have a neutral impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets.
Open Space / Green Infrastructure	No known issues. The site is not located on an identified open space
Transport and Roads	Highway is constrained by its current size, but additional pitches could be supported through appropriate mitigation if and where required.
Coastal Change	The site is not adjacent to a Coastal Flood Hazard Zone
Compatibility with Neighbouring/ Adjoining Uses	No Neighbouring or adjoining land use constraints identified.

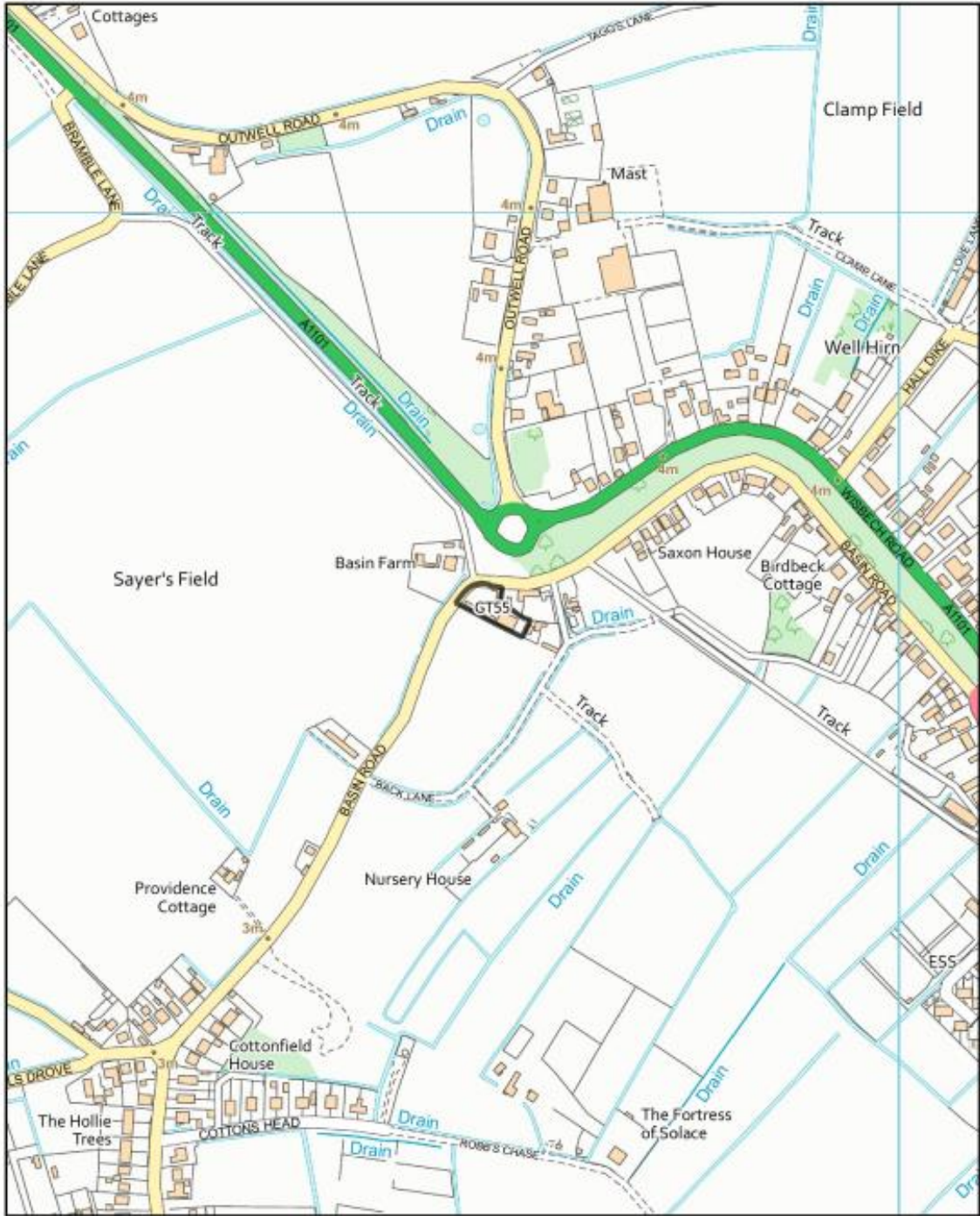
Conclusion

The site has some identified constraints. These include the risk from flooding, highways and its impact on local character and landscape. To investigate these constraints further, the Council commissioned a Strategic Flood Risk Assessment which looked at the sites risk in terms of depth and proximity to established flood defences. This highlights that the site is considered 'a low risk to life' in terms of potential flooding volume and depth.

The highway constraints are limited to the capacity of existing infrastructure. Being rural roads, these are minor, but development here is existent and further growth identified is small in scale and unlikely to lead to any severe impacts to the road network.

In terms of Landscape and townscape the impact is minimal due to this being an existing and established site.

To conclude, the site is considered 'potentially suitable' for development with some mitigation measures.



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GT55



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28/07/23

GT56 Wheatley Bank, Walsoken (South of Worzals parallel to A47)

Site Name/Settlement	Wheatley Bank, Walsoken (South of Worzals parallel to A47)	Site Reference	GT56
Site Capacity	Some remaining capacity	Site Area (Ha)	0.13
Proposed Number of additional pitches/plots	9	Ownership	Private

Is the site suitable?	The site is potentially suitable
Suitability Comments?	
Planning Status	Authorised

Constraint	Comment
Access to Site	Site has a current access on to an existing highway
Accessibility to Local Services and Facilities	No core services within 800m/10 minutes walking distance.
Utilities Capacity	No concerns raised
Utilities Infrastructure	has access to a water supply network and has its own septic tank or package treatment plant due to the remote location.
Contamination and Ground Stability	No known issues. The site is unlikely to be contaminated.
Flood Risk	<p>The site is within Flood Zone 2 and/or 3. The screening of sites through the SRFA shows the hazard associated with the undefended Tidal 200-year event with an allowance for climate change, i.e. an indication of the risk to sites if defences were to breach during an extreme event.</p> <p>As this is an existing authorised site where a direct need has arisen through the GTAA 2023, the Council believes that a planning balance needs to be made between meeting this direct need and identifying appropriate mitigation measures to reduce the impact of flood risk to current and future occupiers of the site.</p>
Nationally and Locally Significant Landscapes	Development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact, on sensitive landscapes or their setting
Townscape	Development of the site would have a neutral impact, but importantly not have a detrimental impact, on townscapes
Biodiversity and Geodiversity	Development of the site would not have a detrimental impact on any designated, protected species or habitat.
Historic Environment	Development of the site would have a neutral impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets.

Constraint	Comment
Open Space / Green Infrastructure	No known issues. The site is not located on an identified open space
Transport and Roads	No off-carriageway walking/cycling available but low traffic volumes likely & wide verges available.
Coastal Change	The site is not adjacent to a Coastal Flood Hazard Zone
Compatibility with Neighbouring/ Adjoining Uses	No Neighbouring or adjoining land use constraints identified.

Conclusion

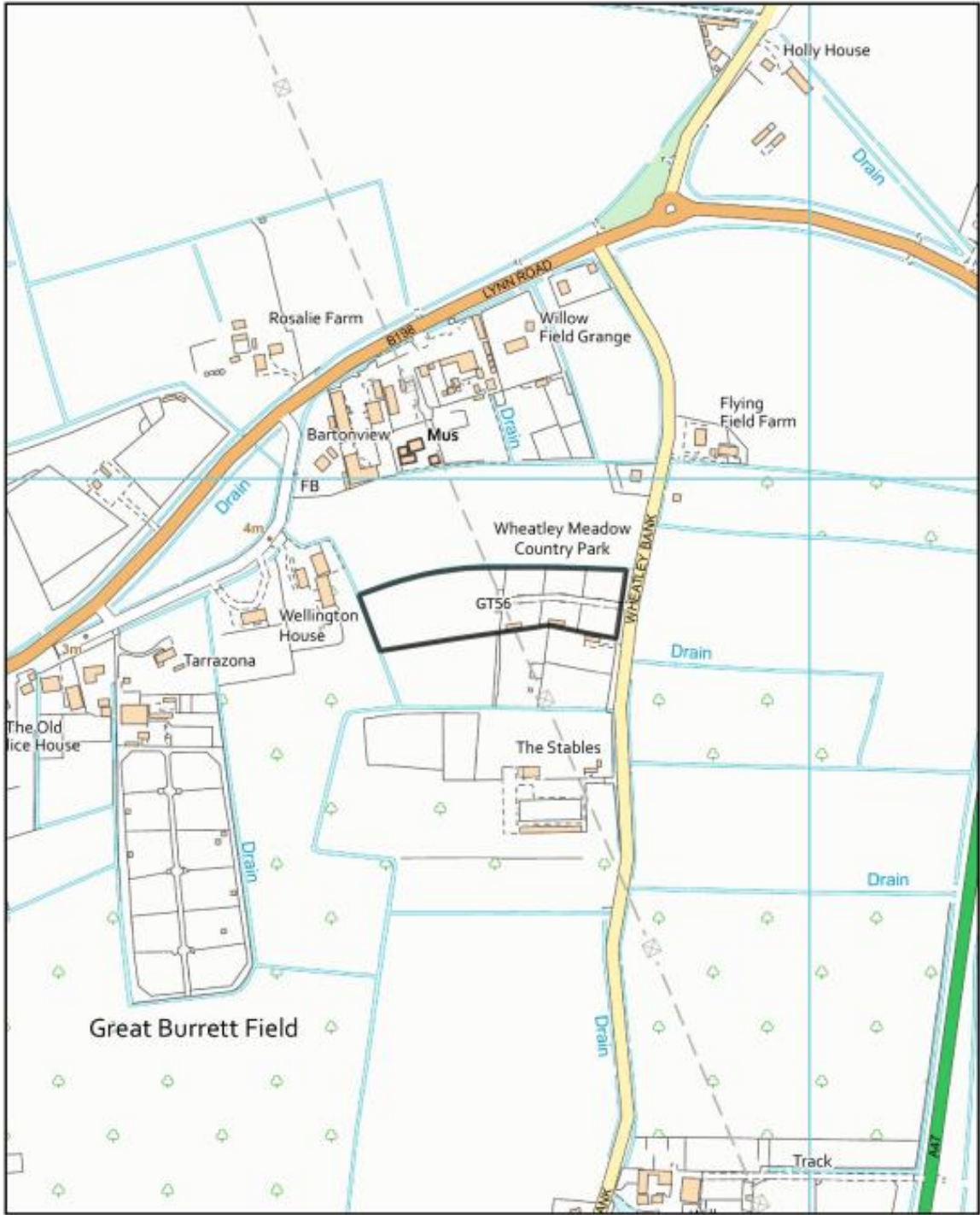
The site has some identified constraints. These include the risk from flooding, highways and its impact on local character and landscape. To investigate these constraints further, the Council commissioned a Strategic Flood Risk Assessment which looked at the sites risk in terms of depth and proximity to established flood defences. Further work is needed to address the existing flooding constraints on the site. If these issues can be adequately addressed by mitigation then the site could be used to accommodate the direct future need.

The highway constraints are limited to the capacity of existing infrastructure. Being rural roads, these are minor, but development here is existent and further growth identified is small in scale and unlikely to lead to any severe impacts to the road network.

In terms of Landscape and townscape the impact is minimal due to this being an existing and established site.

The site owners have submitted a planning application for further expansion of the site.

To conclude, the site is considered 'potentially suitable' for development with mitigation measures.



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GT56



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28/07/23

GT59 Land at Spriggs Hollow, Wiggenhall St Mary Magdalen

Site Name/Settlement	Spriggs Hollow	Site Reference	GT59
Site Capacity	Some remaining capacity	Site Area (Ha)	0.48
Proposed Number of additional pitches/plots	5	Ownership	Private

Is the site suitable?	The site is potentially suitable
Suitability Comments?	The site has some constraints identified that could be overcome through mitigation measures
Planning Status	1 Unauthorised

Constraint	Comment
Access to Site	Site has a current access on to an existing highway
Accessibility to Local Services and Facilities	No core services within 800m/10 minutes walking distance.
Utilities Capacity	No concerns raised
Utilities Infrastructure	has access to a water supply network and has its own septic tank or package treatment plant due to the remote location.
Contamination and Ground Stability	No known issues. The site is unlikely to be contaminated.
Flood Risk	The site is located within Flood Zone 1 (low risk)
Nationally and Locally Significant Landscapes	Development of the site would have a neutral impact but importantly not have a detrimental impact, on sensitive landscapes or their setting
Townscape	Development of the site would have a neutral impact, but importantly not have a detrimental impact, on townscapes
Biodiversity and Geodiversity	Development of the site would not have a detrimental impact on any designated, protected species or habitat.
Historic Environment	Development of the site would have a neutral impact, but importantly not have a detrimental impact on any designated or non designated heritage assets.
Open Space / Green Infrastructure	No known issues. The site is not located on an identified open space
Transport and Roads	Subject to applicant demonstrating acceptable visibility can be provided
Coastal Change	The site is not adjacent to a Coastal Flood Hazard Zone
Compatibility with Neighbouring/ Adjoining Uses	No Neighbouring or adjoining land use constraints identified.

Conclusion

The site has some identified constraints. These include, highways and its impact on local character and landscape.

The highway constraints are limited to the capacity of existing infrastructure. Being rural roads, these are minor, but development here is existent and further growth identified is small in scale and unlikely to lead to any severe impacts to the road network.

In terms of Landscape and townscape the impact is minimal due to this being an existing and established site.

To conclude, the site is considered 'potentially suitable' for development.



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GT59



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28/07/23

GT66 Land at Brandon Road, Methwold

Site Name/Settlement	Land at Brandon Road, Methwold	Site Reference	GT66
Site Capacity	Some remaining capacity	Site Area (Ha)	0.47
Proposed Number of additional pitches/plots	1	Ownership	Private

Is the site suitable?	The site is suitable
Suitability Comments?	The site has some identified constraints that could be overcome through mitigation.
Planning Status	Authorised

Constraint	Comment
Access to Site	Site has a current access on to an existing highway
Accessibility to Local Services and Facilities	No core services within 800m/10 minutes walking distance.
Utilities Capacity	No concerns raised
Utilities Infrastructure	has access to a water supply network and has its own septic tank or package treatment plant due to the remote location.
Contamination and Ground Stability	No known issues. The site is unlikely to be contaminated.
Flood Risk	The site is within Flood Zone 1 (low risk)
Nationally and Locally Significant Landscapes	Development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact, on sensitive landscapes or their setting
Townscape	Development of the site would have a neutral impact, but importantly not have a detrimental impact, on townscapes
Biodiversity and Geodiversity	Development of the site would not have a detrimental impact on any designated, protected species or habitat.
Historic Environment	Development of the site would have a neutral impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets.
Open Space / Green Infrastructure	No known issues. The site is not located on an identified open space
Transport and Roads	Site remote and located on fast B-road with no off-carriageway walking/cycling. Highway is constrained by its current size, but additional pitches could be supported through appropriate mitigation if and where required.
Coastal Change	The site is not adjacent to a Coastal Flood Hazard Zone
Compatibility with Neighbouring/ Adjoining Uses	No Neighbouring or adjoining land use constraints identified.

Conclusion

The site has some identified constraints. These include highways and its impact on local character and landscape.

The highway constraints are limited to the capacity of existing infrastructure. Being rural roads, these are minor, but development here is existent and further growth identified is small in scale and unlikely to lead to any severe impacts to the road network.

In terms of Landscape and townscape the impact is minimal due to this being an existing and established site.

To conclude, the site is considered 'potentially suitable' for development with some mitigation measures.

New Site at: GTRA(B) Land at Station Road, West Dereham

Site Name/Settlement	Land West of Station Road, West Dereham	Site Reference	GTRA(B)
Site Capacity	10	Site Area (Ha)	1.45
Proposed Number of additional pitches/plots	10	Ownership	Private

Is the site suitable?	The site is potentially suitable
Suitability Comments?	The site has some identified constraints that could be overcome through mitigation.
Planning Status	Potential New Site – Planning application pending 23/01606/F

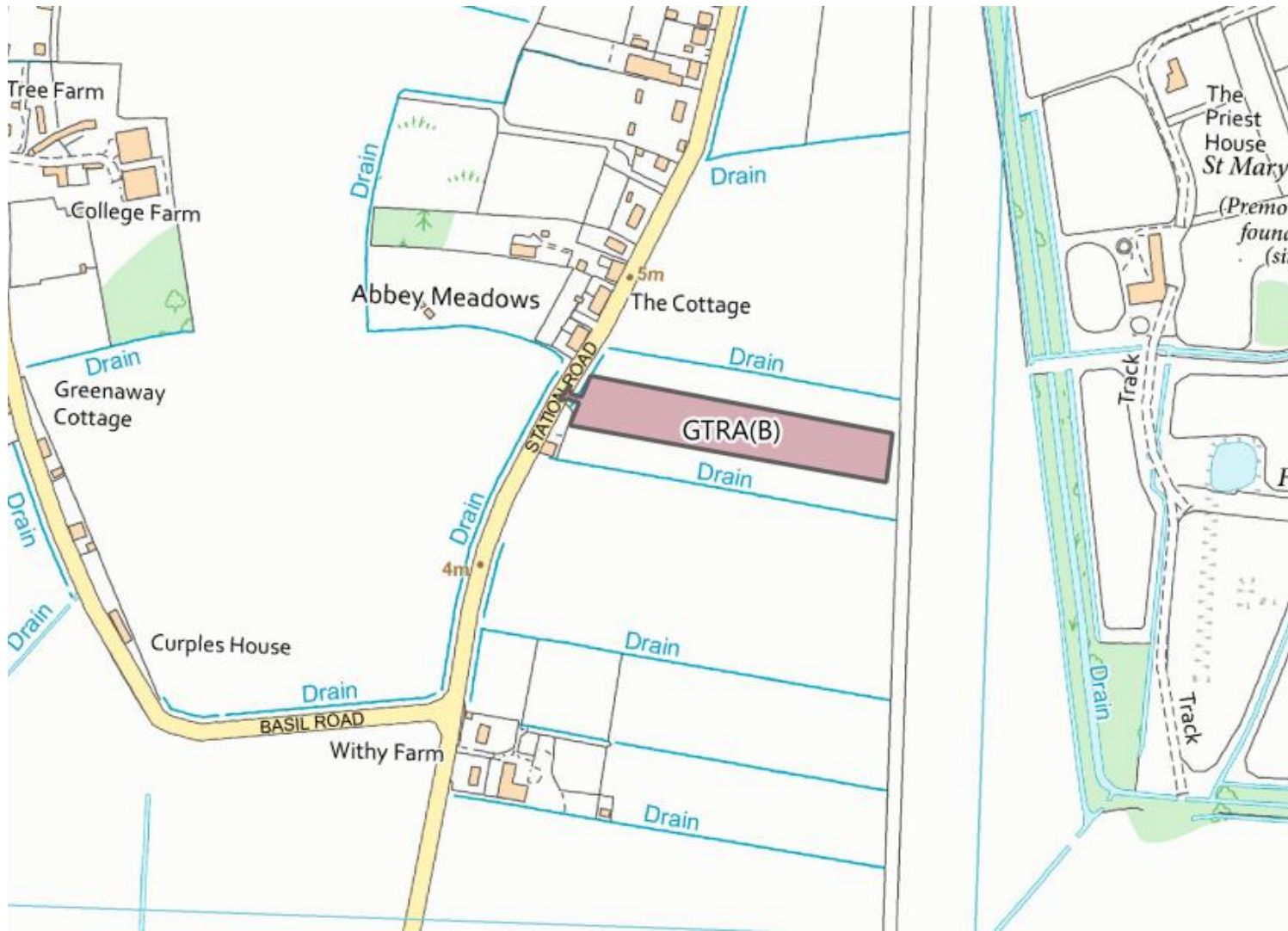
Constraint	Comment
Access to Site	The site could achieve a suitable access once vegetation is cleared.
Accessibility to Local Services and Facilities	No core services within 800m/10 minutes walking distance.
Utilities Capacity Utilities Infrastructure	No information has been supplied with respect to foul drainage (septic tank is ticked on the application form) or waste and recycling storage and collection. No details have been provided or shown on the site plans. I support the comments and stance of the Waste and Recycling Manager. Each pitch/plot should have storage for relevant wheeled bins and food caddies and the site requires a presentation point at the kerbside. Given the public comments, supported by photographic evidence, with respect to the water saturation levels of the land, we would be particularly concerned about the safe and effective use and operation of a septic tank. Under general building rules, updated in January 2020, discharge from septic tanks cannot be dispersed to surface water areas such as the drains/ ditches systems must treat the water and discharge to drainage fields. It appears this would not be possible in this location. No information in the form of percolation tests has been supplied to evidence that the infiltration drainage is possible. Until such evidence is available, we would be obliged to issue a holding objection.
Contamination and Ground Stability	No known issues. The site is unlikely to be contaminated.
Flood Risk	The site is located within Flood Zone 1 (low risk). Some identified drainage issues to the rear of the site.
Nationally and Locally Significant Landscapes	Development of the site would have a neutral impact but importantly not have a detrimental impact, on sensitive landscapes or their setting
Townscape	Development likely to have some impact on townscape with limited development on that side of Station Road. However, these issues can be mitigated through siting and design.
Biodiversity and Geodiversity	The site appears to be dominated by arable land. There are water bodies within 250m of the site boundary but the habitat on site is

Constraint	Comment
	<p>typically hostile to the species, given this and that the site is surrounded by a network of ditches within the wider landscape I would not consider it likely that species are present.</p> <p>There is a ditch which the proposed access crosses but aerial imagery show this to be filled in and no longer present. A 9m buffer has been shown on the plan around the two watercourses bounding the east and west of the site respectively. It is unlikely that the development would impact riparian mammals based on this design. The proposed block plan design includes proposals for meadow grass to be planted within this 9m buffer. I advise that suitable species rich grass mix is used to optimise the value of this area for biodiversity. It is possible that badgers would use the site for foraging and that bats may forage/commute across the site. The proposed development must therefore feature wildlife sensitive lighting to minimise light spill into the surrounding countryside.</p> <p>The proposal will result in a net increase in overnight accommodation and will be required to pay the GIRAMS tariff or submit a bespoke mitigation approach to combine recreational impacts on protected site</p>
Historic Environment	Development of the site would have a neutral impact, but importantly not have a detrimental impact on any designated or non designated heritage assets.
Open Space / Green Infrastructure	No known issues. The site is not located on an identified a public open space.
Transport and Roads	Station road is narrow in parts but it does have intervisable passing provisions which enable formal passing on the road. It is also evident that the point of access, once vegetation has been cut, would accord with adopted guidance. The proposed development site is however remote from schooling; town centre shopping; health provision and has restricted employment opportunities with limited scope for improving access by foot and public transport. The distance from service centre provision precludes any realistic opportunity of encouraging modal shift away from the private car towards public transport
Coastal Change	The site is not adjacent to a Coastal Flood Hazard Zone
Compatibility with Neighbouring/ Adjoining Uses	Near residential dwellings. Development of the site could have issues of compatibility with neighbouring/adjoin uses; however, these could be reasonably mitigated through the design of the site and/ or limiting the size of the site.

Conclusion

The site has some identified constraints such as its potential impact on local character, landscape, drainage and biodiversity. However, it is likely that these issues could be suitably mitigated through the citing and design of the site.

To conclude, the site is considered 'potentially suitable' for development with some mitigation measures.



New Site at: GTRA(C) Land to the West of Wheatley Bank and South of Wheatley Meadow Country Park, Walsoken

Site Name/Settlement	Land To the West of Wheatley Bank And South of Wheatley Meadow Country Park Travellers Site Wheatley Bank	Site Reference	GTRA(C)
Site Capacity	1	Site Area (Ha)	0.16
Proposed Number of additional pitches/plots	1	Ownership	Private

Is the site suitable?	The site is Potentially suitable
Suitability Comments?	The site has some constraints identified, but it is likely that these could be overcome via mitigation measures
Planning Status	Potential New Site – Planning application pending.

Constraint	Comment
Access to Site	Site has a current access on to an existing highway
Accessibility to Local Services and Facilities	No core services within 800m/10 minutes walking distance.
Utilities Capacity	No concerns raised
Utilities Infrastructure	Has access to a water supply network and has its own septic tank or package treatment plant due to the remote location.
Contamination and Ground Stability	No known issues. The site is unlikely to be contaminated.
Flood Risk	<p>The site is within Flood Zone 2 and/or 3. The screening of sites through the SRFA shows the hazard associated with the undefended Tidal 200-year event with an allowance for climate change, i.e. an indication of the risk to sites if defences were to breach during an extreme event.</p> <p>As this is an existing authorised site where a direct need has arisen through the GTAA 2023, the Council believes that a planning balance needs to be made between meeting this direct need and identifying appropriate mitigation measures to reduce the impact of flood risk to current and future occupiers of the site.</p>
Nationally and Locally Significant Landscapes	Development of the site would have a neutral impact but importantly not have a detrimental impact, on sensitive landscapes or their setting
Townscape	Development likely to have some impact on townscape, but can be mitigated through siting and design.

Constraint	Comment
Biodiversity and Geodiversity	Development of the site would not have a detrimental impact on any designated, protected species or habitat.
Historic Environment	Development of the site would have a neutral impact, but importantly not have a detrimental impact on any designated or non designated heritage assets.
Open Space / Green Infrastructure	No known issues. The site is not located on an identified open space
Transport and Roads	Highway is constrained by its current size, but additional pitches could be supported through appropriate mitigation if and where required.
Coastal Change	The site is not adjacent to a Coastal Flood Hazard Zone
Compatibility with Neighbouring/ Adjoining Uses	Near residential dwellings. Development of the site could have issues of compatibility with neighbouring/adjoin uses; however, these could be reasonably mitigate

Conclusion

The site has some identified constraints. These include the risk from flooding, highways and its impact on local character and landscape. To investigate these constraints further, the Council commissioned a Strategic Flood Risk Assessment which looked at the sites risk in terms of depth and proximity to established flood defences. Further work is needed to address the existing flooding constraints on the site. If these issues can be adequately addressed by mitigation then the site could be used to accommodate the direct future need.

Being rural roads, these are minor, but development here is existent and further growth identified is small in scale and unlikely to lead to any severe impacts to the road network.

To conclude, the site is considered 'Potentially suitable' for development.



Pitches Authorised at:

GT09 The Stables, Walpole St Andrew

Site Name/Settlement	The Stables, Gooses Lane, Walpole St Andrew	Site Reference	GT09
Site Capacity	Some remaining capacity.	Site Area (Ha)	0.26
Proposed Number of additional pitches/plots	1	Ownership	Private

Is the site suitable?	The site is potentially suitable (Exception)
Suitability Comments?	The site has some identified constraints. Due to their being an identified need arising from this site, further work is being undertaken to see if these constraints can be adequately addressed through mitigation.
Planning Status	Authorised

Constraint	Comment
Access to Site	Site has a current access on to an existing highway. Applicant needs to demonstrate that acceptable visibility can be provided.
Accessibility to Local Services and Facilities	Site is within walkable distance to one to three core services within 1200m.
Utilities Capacity	No concerns raised
Utilities Infrastructure	Has access to a water supply network and has its own septic tank or package treatment plant due to the remote location.
Contamination and Ground Stability	No known issues. The site is unlikely to be contaminated.
Flood Risk	<p>The site is within Flood Zone 2 and/or 3. The screening of sites through the SRFA shows the hazard associated with the undefended Tidal 200-year event with an allowance for climate change, i.e. an indication of the risk to sites if defences were to breach during an extreme event.</p> <p>As this is an existing authorised site where a direct need has arisen through the GTAA 2023, the Council believes that a planning balance needs to be made between meeting this direct need and identifying appropriate mitigation measures to reduce the impact of flood risk to current and future occupiers of the site.</p>
Nationally and Locally Significant Landscapes	Development of the site would have a neutral impact but importantly not have a detrimental impact, on sensitive landscapes or their setting
Townscape	Development of the site would have a neutral impact, but importantly not have a detrimental impact, on townscapes
Biodiversity and Geodiversity	Development of the site would not have a detrimental impact on any designated, protected species or habitat.

Constraint	Comment
Historic Environment	Development of the site would have a neutral impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets.
Open Space / Green Infrastructure	No known issues. The site is not located on an identified open space
Transport and Roads	Highway is constrained by its current size, but additional pitches could be supported through appropriate mitigation if and where required.
Coastal Change	The site is not adjacent to a Coastal Flood Hazard Zone
Compatibility with Neighbouring/ Adjoining Uses	No Neighbouring or adjoining land use constraints identified.

Conclusion

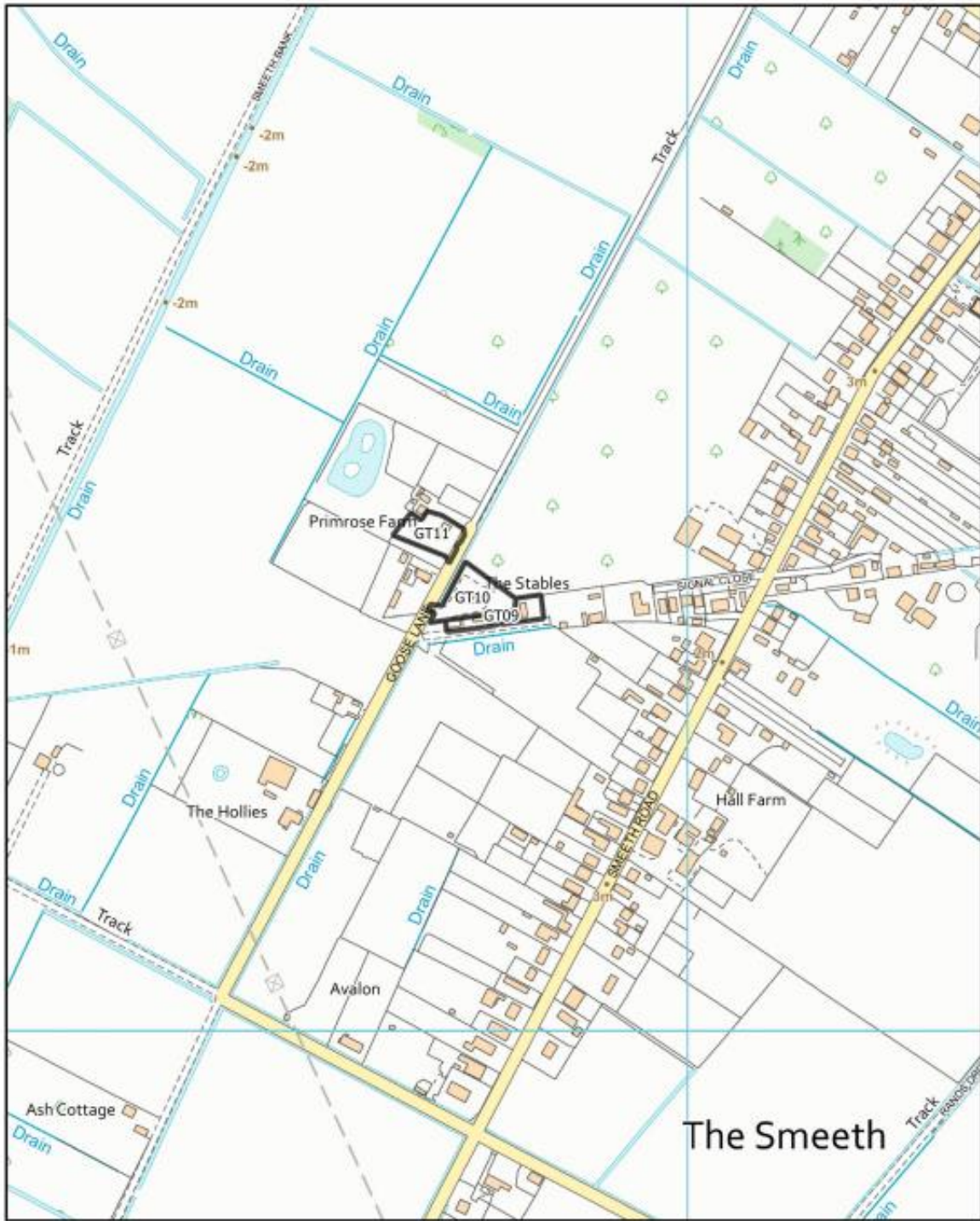
The site has some identified constraints. These include the risk from flooding, highways and its impact on local character and landscape. To investigate these constraints further, the Council commissioned a Strategic Flood Risk Assessment which looked at the sites risk in terms of depth and proximity to established flood defences. Further work is needed to address the existing flooding constraints on the site. If these issues can be adequately addressed by mitigation then the site could be used to accommodate the direct future need.

The highway constraints are limited to the capacity of existing infrastructure. Being rural roads, these are minor, but development here is existent and further growth identified is small in scale and unlikely to lead to any severe impacts to the road network.

There remains no available capacity to accommodate an additional 3 pitches on this site. It is unlikely that an extension of the site can be secured.

In terms of Landscape and townscape the impact is minimal due to this being an existing and established site.

To conclude, the site is considered 'potentially suitable' for development due to flooding constraints.



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GT09, GT10 & GT11



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28/07/23

GT43 Homefield, Common Rd South

Site Name/Settlement	Homefield, Common Rd South	Site Reference	GT43
Site Capacity	Some remaining capacity	Site Area (Ha)	1.8
Proposed Number of additional pitches/plots	1	Ownership	Private

Is the site suitable?	The site is potentially suitable
Suitability Comments?	The site some identified constraints that could be overcome through mitigation.
Planning Status	1 Unauthorised

Constraint	Comment
Access to Site	Site has a current access on to an existing highway
Accessibility to Local Services and Facilities	Site is within walkable distance to one to three core services within 1200m.
Utilities Capacity	No concerns raised
Utilities Infrastructure	has access to a water supply network and has its own septic tank or package treatment plant due to the remote location.
Contamination and Ground Stability	No known issues. The site is unlikely to be contaminated.
Flood Risk	<p>The site is within Flood Zone 2 and/or 3. The screening of sites through the SRFA shows the hazard associated with the undefended Tidal 200-year event with an allowance for climate change, i.e. an indication of the risk to sites if defences were to breach during an extreme event.</p> <p>As this is an existing authorised site where a direct need has arisen through the GTAA 2023, the Council believes that a planning balance needs to be made between meeting this direct need and identifying appropriate mitigation measures to reduce the impact of flood risk to current and future occupiers of the site.</p>
Nationally and Locally Significant Landscapes	Development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact, on sensitive landscapes or their setting
Townscape	Development likely to have some impact on townscape, but can be mitigated through siting and design
Biodiversity and Geodiversity	Development of the site would not have a detrimental impact on any designated, protected species or habitat.
Historic Environment	Development of the site would have a neutral impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets.
Open Space / Green	No known issues. The site is not located on an identified open space

Constraint	Comment
Infrastructure	
Transport and Roads	Highway is constrained by its current size, but additional pitches could be supported through appropriate mitigation if and where required.
Coastal Change	The site is not adjacent to a Coastal Flood Hazard Zone
Compatibility with Neighbouring/ Adjoining Uses	Near residential dwellings. Development of the site could have issues of compatibility with neighbouring/adjoin uses; however, these could be reasonably mitigated.

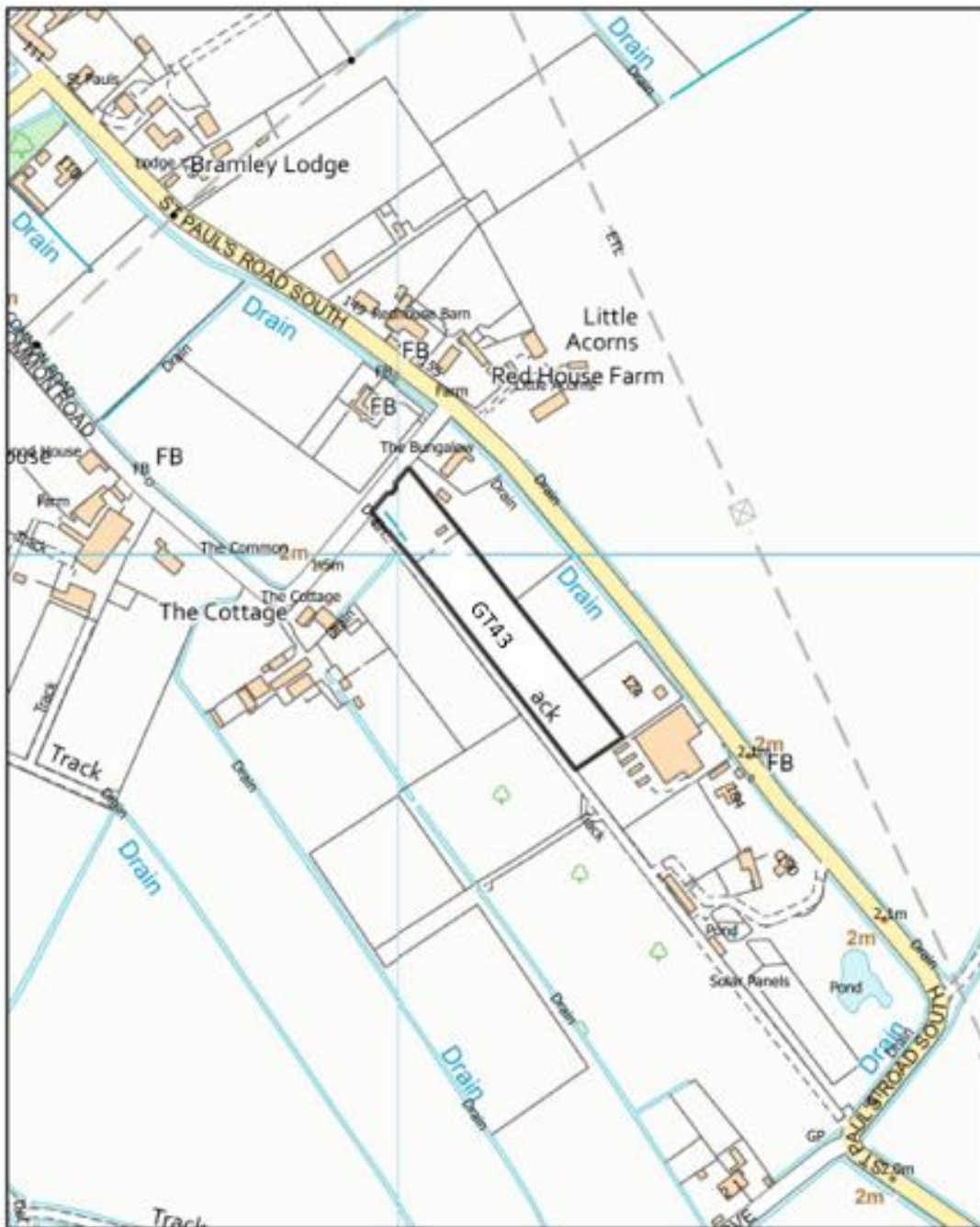
Conclusion

The site has some identified constraints. These include the risk from flooding, highways and its impact on local character and landscape. To investigate these constraints further, the Council commissioned a Strategic Flood Risk Assessment which looked at the sites risk in terms of depth and proximity to established flood defences. Further work is needed to address the existing flooding constraints on the site. If these issues can be adequately addressed by mitigation then the site could be used to accommodate the direct future need.

The highway constraints are limited to the capacity of existing infrastructure. Being rural roads, these are minor, but development here is existent and further growth identified is small in scale and unlikely to lead to any severe impacts to the road network.

In terms of Landscape and townscape the impact is minimal due to this being an existing and established site.

To conclude, the site is considered 'potentially suitable' for development with some mitigation measures.



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GT43



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04/08/23

GT59 Spriggs Hollow

Site Name/Settlement	Spriggs Hollow	Site Reference	GT59
Site Capacity	Some remaining capacity	Site Area (Ha)	0.48
Proposed Number of additional pitches/plots	5	Ownership	Private

Is the site suitable?	The site is potentially suitable
Suitability Comments?	The site has some constraints identified that could be overcome through mitigation measures
Planning Status	1 Unauthorised

Constraint	Comment
Access to Site	Site has a current access on to an existing highway
Accessibility to Local Services and Facilities	No core services within 800m/10 minutes walking distance.
Utilities Capacity	No concerns raised
Utilities Infrastructure	has access to a water supply network and has its own septic tank or package treatment plant due to the remote location.
Contamination and Ground Stability	No known issues. The site is unlikely to be contaminated.
Flood Risk	The site is located within Flood Zone 1 (low risk)
Nationally and Locally Significant Landscapes	Development of the site would not have either a neutral or positive impact, but importantly not have a detrimental impact, on sensitive landscapes or their setting
Townscape	Development of the site would have a neutral impact, but importantly not have a detrimental impact, on townscapes
Biodiversity and Geodiversity	Development of the site would not have a detrimental impact on any designated, protected species or habitat.
Historic Environment	Development of the site would have a neutral impact, but importantly not have a detrimental impact on any designated or non designated heritage assets.
Open Space / Green Infrastructure	No known issues. The site is not located on an identified open space
Transport and Roads	Subject to applicant demonstrating acceptable visibility can be provided
Coastal Change	The site is not adjacent to a Coastal Flood Hazard Zone
Compatibility with Neighbouring/ Adjoining Uses	No Neighbouring or adjoining land use constraints identified.

Conclusion

The site has some identified constraints. These include, highways and its impact on local character and landscape.

The highway constraints are limited to the capacity of existing infrastructure. Being rural roads, these are minor, but development here is existent and further growth identified is small in scale and unlikely to lead to any severe impacts to the road network.

In terms of Landscape and townscape the impact is minimal due to this being an existing and established site.

To conclude, the site is considered 'potentially suitable' for development.



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GT59



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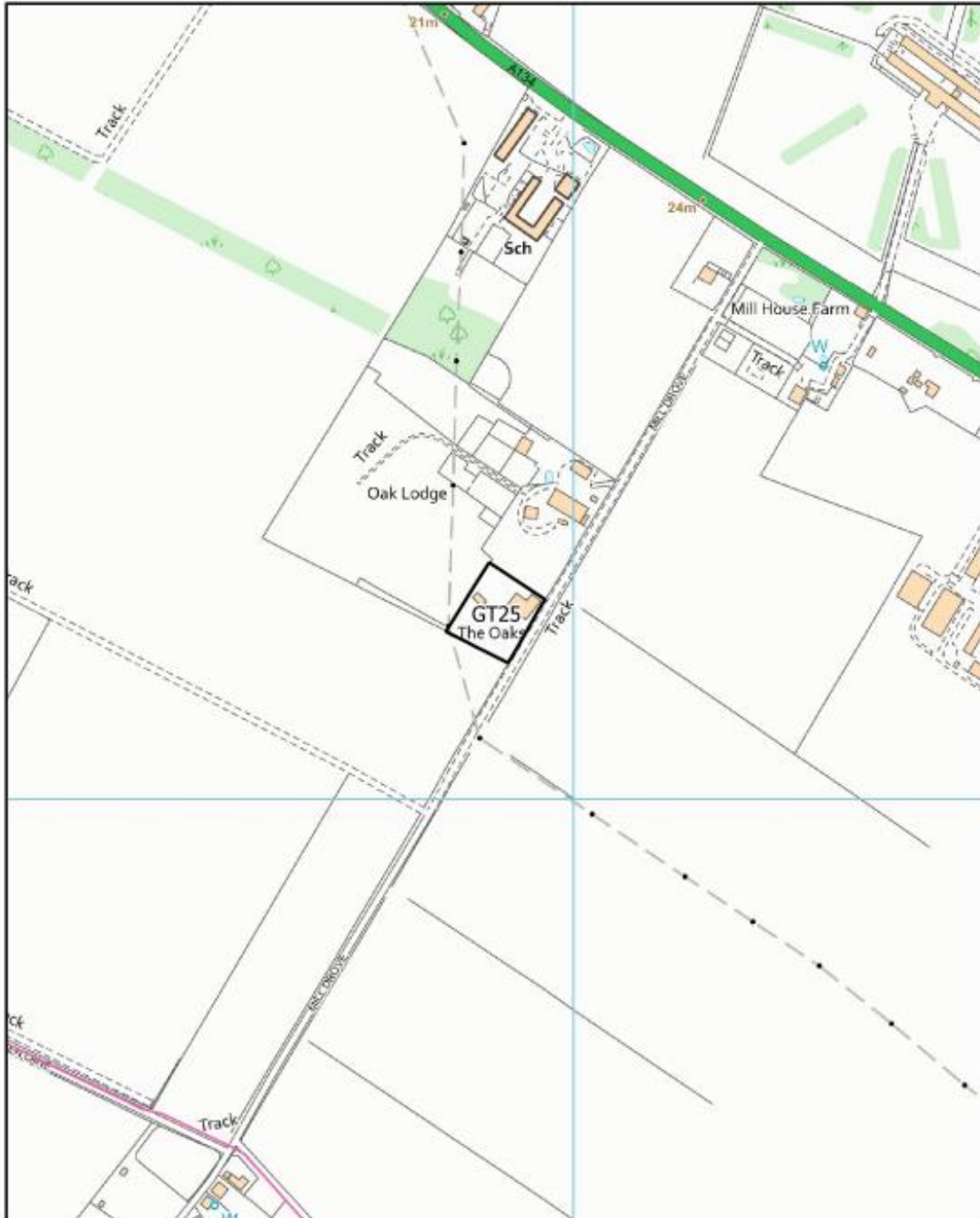
Land for Travelling Showpeople GT25 Land at the Oaks, Northwold

Site Name/Settlement	The Oaks, Mill Drove, Northwold	Site Reference	GT25
Site Capacity	Some remaining capacity	Site Area (Ha)	0.32
Proposed Number of additional pitches/plots	1	Ownership	Private

Is the site suitable?	The site is suitable
Suitability Comments?	The site has some identified constraints that could be overcome through mitigation.
Planning Status	Authorised

Constraint	Comment
Access to Site	Site has a current access on to an existing highway. Applicant needs to demonstrate that acceptable visibility can be provided.
Accessibility to Local Services and Facilities	No core services within 800m/10 minutes walking distance.
Utilities Capacity	No concerns raised
Utilities Infrastructure	has access to a water supply network and has its own septic tank or package treatment plant due to the remote location.
Contamination and Ground Stability	No known issues. The site is unlikely to be contaminated.
Flood Risk	The site is within Flood Zone 1 (low risk)
Nationally and Locally Significant Landscapes	Development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact, on sensitive landscapes or their setting
Townscape	Development of the site would have a neutral impact, but importantly not have a detrimental impact, on townscapes
Biodiversity and Geodiversity	Development of the site would not have a detrimental impact on any designated, protected species or habitat.
Historic Environment	Development of the site would have a neutral impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets.
Open Space / Green Infrastructure	No known issues. The site is not located on an identified open space
Transport and Roads	Increased slowing stopping & turning movements at a corridor of movement represent a concern. Highway is constrained by its current size, but additional pitches could be supported through appropriate mitigation if and where required.
Coastal Change	The site is not adjacent to a Coastal Flood Hazard Zone
Compatibility with	No Neighbouring or adjoining land use constraints identified.

Constraint	Comment
Neighbouring/ Adjoining Uses	
Conclusion	
<p>The site has some identified constraints. These include the risk from flooding, highways and its impact on local character and landscape. To investigate these constraints further, the Council commissioned a Strategic Flood Risk Assessment which looked at the sites risk in terms of depth and proximity to established flood defences. This highlights that the site is considered ‘a low risk to life’ in terms of potential flooding volume and depth.</p>	
<p>The highway constraints are limited to the capacity of existing infrastructure. Being rural roads, these are minor, but development here is existent and further growth identified is small in scale and unlikely to lead to any severe impacts to the road network.</p>	
<p>In terms of Landscape and townscape the impact is minimal due to this being an existing and established site.</p>	
<p>To conclude, the site is considered ‘suitable’ for development with some mitigation measures.</p>	



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GT25



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08/12/2023

GT62 Land at Redgate Farm, Magdalen Road, Tilney St Lawrence

Site Name/Settlement	Redgate Farm, Magdalen Road, Tilney St Lawrence Travelling Showpeople	Site Reference	GT62
Site Capacity	Some remaining capacity	Site Area (Ha)	0.24
Proposed Number of additional pitches/plots	2	Ownership	Private

Is the site suitable?	The site is potentially suitable
Suitability Comments?	The site has some identified constraints. Due to their being an identified need arising from this site, further work is being undertaken to see if these constraints can be adequately addressed through mitigation.
Planning Status	Authorised

Constraint	Comment
Access to Site	Site has a current access on to an existing highway
Accessibility to Local Services and Facilities	No core services within 800m/10 minutes walking distance.
Utilities Capacity	No concerns raised
Utilities Infrastructure	has access to a water supply network and has its own septic tank or package treatment plant due to the remote location.
Contamination and Ground Stability	No known issues. The site is unlikely to be contaminated.
Flood Risk	<p>The site is within Flood Zone 2 and/or 3. The screening of sites through the SRFA shows the hazard associated with the undefended Tidal 200-year event with an allowance for climate change, i.e. an indication of the risk to sites if defences were to breach during an extreme event.</p> <p>As this is an existing authorised site where a direct need has arisen through the GTAA 2023, the Council believes that a planning balance needs to be made between meeting this direct need and identifying appropriate mitigation measures to reduce the impact of flood risk to current and future occupiers of the site.</p>
Nationally and Locally Significant Landscapes	Development of the site would have a neutral impact but importantly not have a detrimental impact, on sensitive landscapes or their setting
Townscape	Development of the site would have a neutral impact, but importantly not have a detrimental impact, on townscapes
Biodiversity and Geodiversity	Development of the site would not have a detrimental impact on any designated, protected species or habitat.

Constraint	Comment
Historic Environment	Development of the site would have a neutral impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets.
Open Space / Green Infrastructure	No known issues. The site is not located on an identified open space
Transport and Roads	Highway is constrained by its current size, but additional pitches could be supported through appropriate mitigation if and where required.
Coastal Change	The site is not adjacent to a Coastal Flood Hazard Zone
Compatibility with Neighbouring/ Adjoining Uses	No Neighbouring or adjoining land use constraints identified.

Conclusion

The site has some identified constraints. These include the risk from flooding, highways and its impact on local character and landscape. To investigate these constraints further, the Council commissioned a Strategic Flood Risk Assessment which looked at the sites risk in terms of depth and proximity to established flood defences. Further work is needed to address the existing flooding constraints on the site. If these issues can be adequately addressed by mitigation then the site could be used to accommodate the direct future need.

The highway constraints are limited to the capacity of existing infrastructure. Being rural roads, these are minor, but development here is existent and further growth identified is small in scale and unlikely to lead to any severe impacts to the road network.

In terms of Landscape and townscape the impact is minimal due to this being an existing and established site.

To conclude, the site is considered 'potentially suitable' for development with some mitigation measures.



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GT62



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28/07/23

GT67 Llamedos – Syderstone

Site Name/Settlement	Llamedos - Syderstone Travelling Showpeople	Site Reference	GT67
Site Capacity	Some remaining capacity	Site Area (Ha)	0.65
Proposed Number of additional pitches/plots	1	Ownership	Private

Is the site suitable?	The site is potentially suitable
Suitability Comments?	The site has some identified constraints that could be overcome through mitigation.
Planning Status	Authorised

Constraint	Comment
Access to Site	Site has a current access on to an existing highway
Accessibility to Local Services and Facilities	No core services within 800m/10 minutes walking distance.
Utilities Capacity	No concerns raised
Utilities Infrastructure	has access to a water supply network and has its own septic tank or package treatment plant due to the remote location.
Contamination and Ground Stability	No known issues. The site is unlikely to be contaminated.
Flood Risk	The site is located within Flood Zone 1 (low risk)
Nationally and Locally Significant Landscapes	Development of the site would have a neutral impact but importantly not have a detrimental impact, on sensitive landscapes or their setting
Townscape	Development of the site would have a neutral impact, but importantly not have a detrimental impact, on townscapes
Biodiversity and Geodiversity	Development of the site would not have a detrimental impact on any designated, protected species or habitat.
Historic Environment	Development of the site would have a neutral impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets.
Open Space / Green Infrastructure	No known issues. The site is not located on an identified open space
Transport and Roads	Highway is constrained by its current size, but additional pitches could be supported through appropriate mitigation if and where required.
Coastal Change	The site is not adjacent to a Coastal Flood Hazard Zone
Compatibility with Neighbouring/ Adjoining Uses	Near residential dwellings. Development of the site could have issues of compatibility with neighbouring/adjoin uses; however, these could be reasonably mitigate

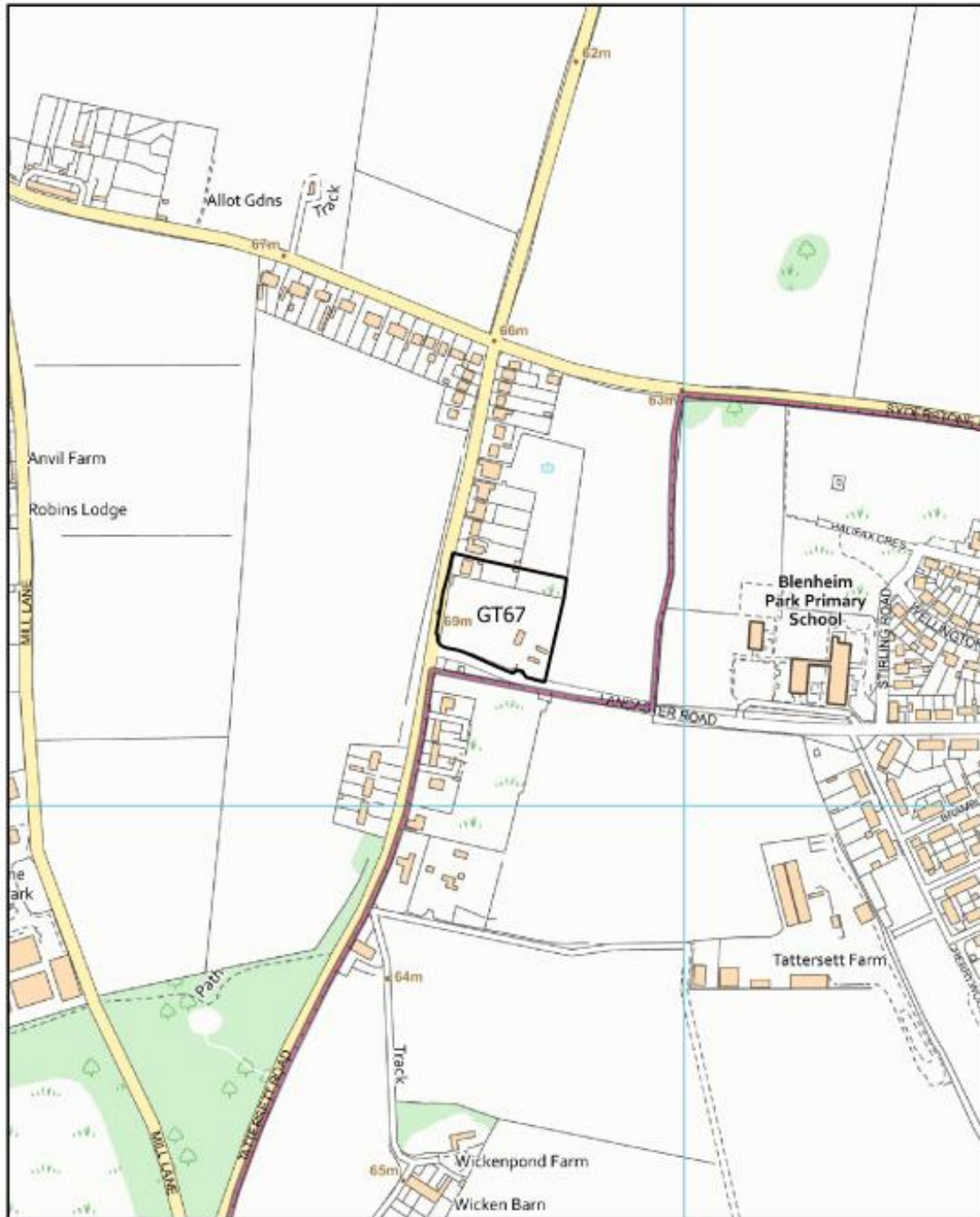
Conclusion

The site has some identified constraints. These include highways and its impact on local character and landscape.

The highway constraints are limited to the capacity of existing infrastructure. Being rural roads, these are minor, but development here is existent and further growth identified is small in scale and unlikely to lead to any severe impacts to the road network.

In terms of Landscape and townscape the impact is minimal due to this being an existing and established site.

To conclude, the site is considered 'potentially suitable' for development with some mitigation measures.



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GT67



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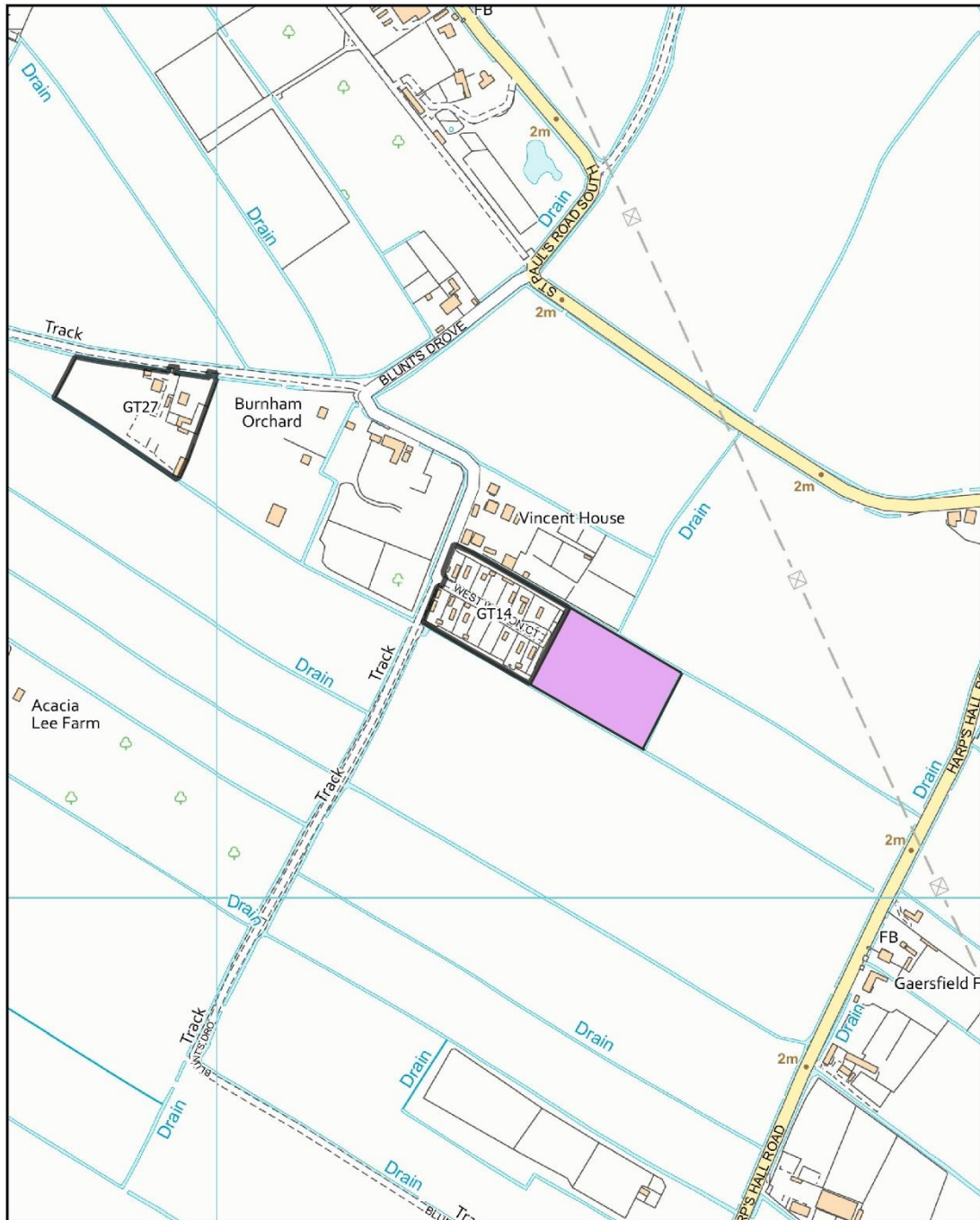
11/12/2023

Potential Broad Locations for Growth

These are locations where land is available for some future development, but there remains some uncertainty over the suitability/deliverability in the medium term. Further work is ongoing to resolve these issues.

- Potential extension to GT14 (purple highlighted area)
- Potential extension to GT17 (purple highlighted area)
- Potential extension to GT18 (purple highlighted area)
- Potential extension to GT21 (purple highlighted area)
- Land at GT37 (purple highlighted area)
- Land at GT38 (purple highlighted area)
- Land at Wisbech Fringe (purple highlighted area)

Proposed extension to GT14 (purple highlighted area)



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GT14 & GT27

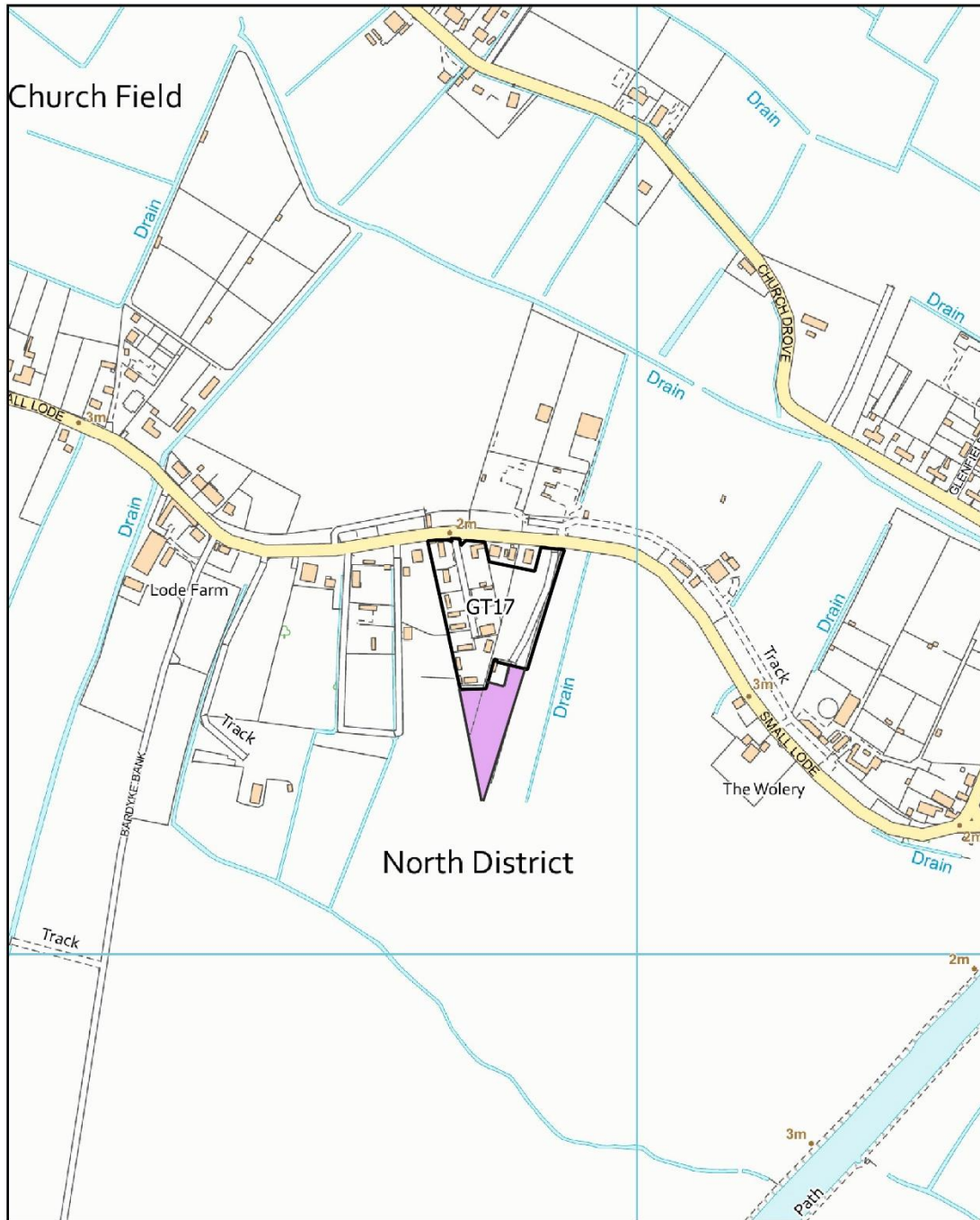


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Proposed extension to GT17 (purple highlighted area)



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GT17

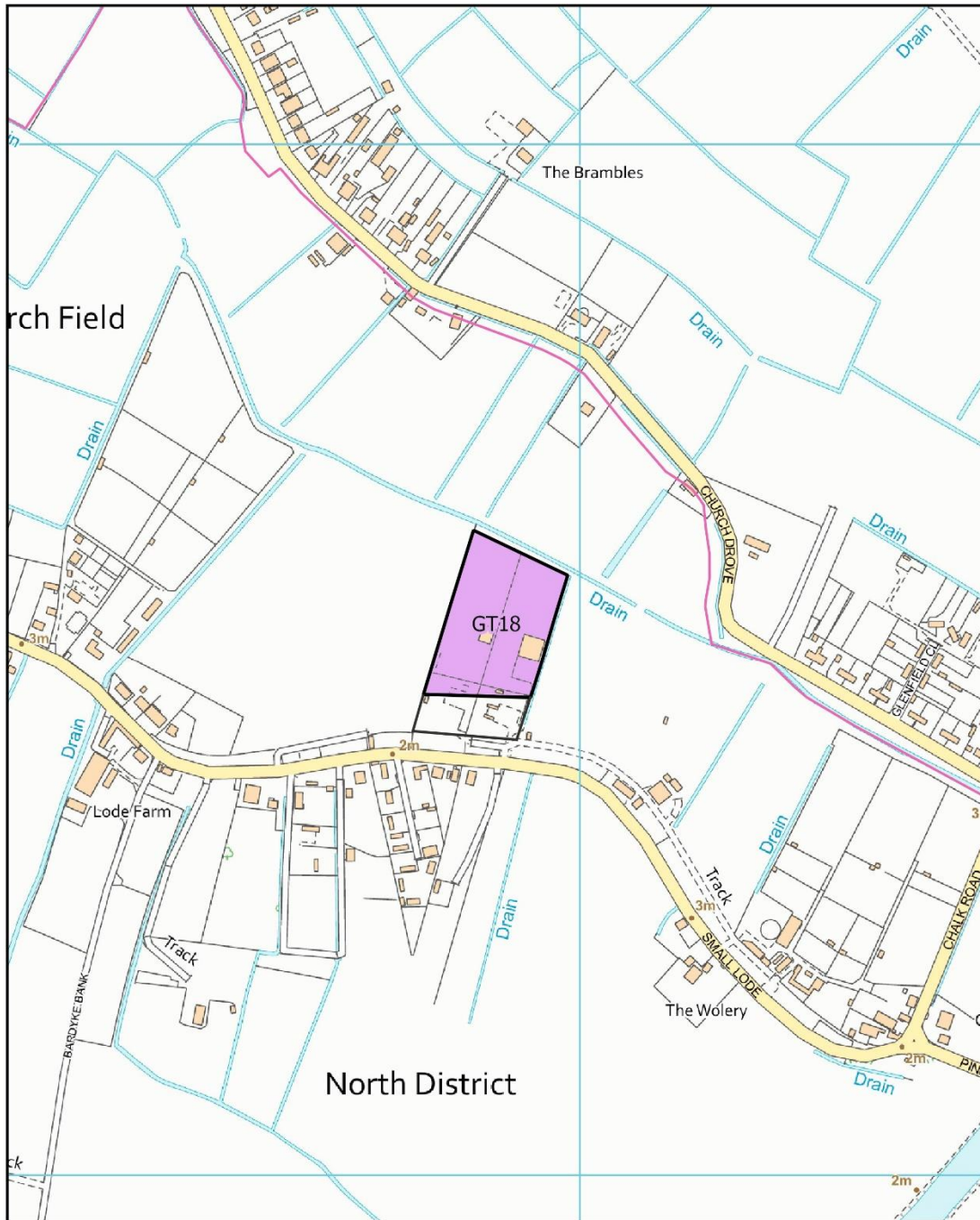


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11/12/2023

Proposed extension to GT18, Small Lode, Upwell (purple highlighted area)



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Tel. 01553 616200

GT18

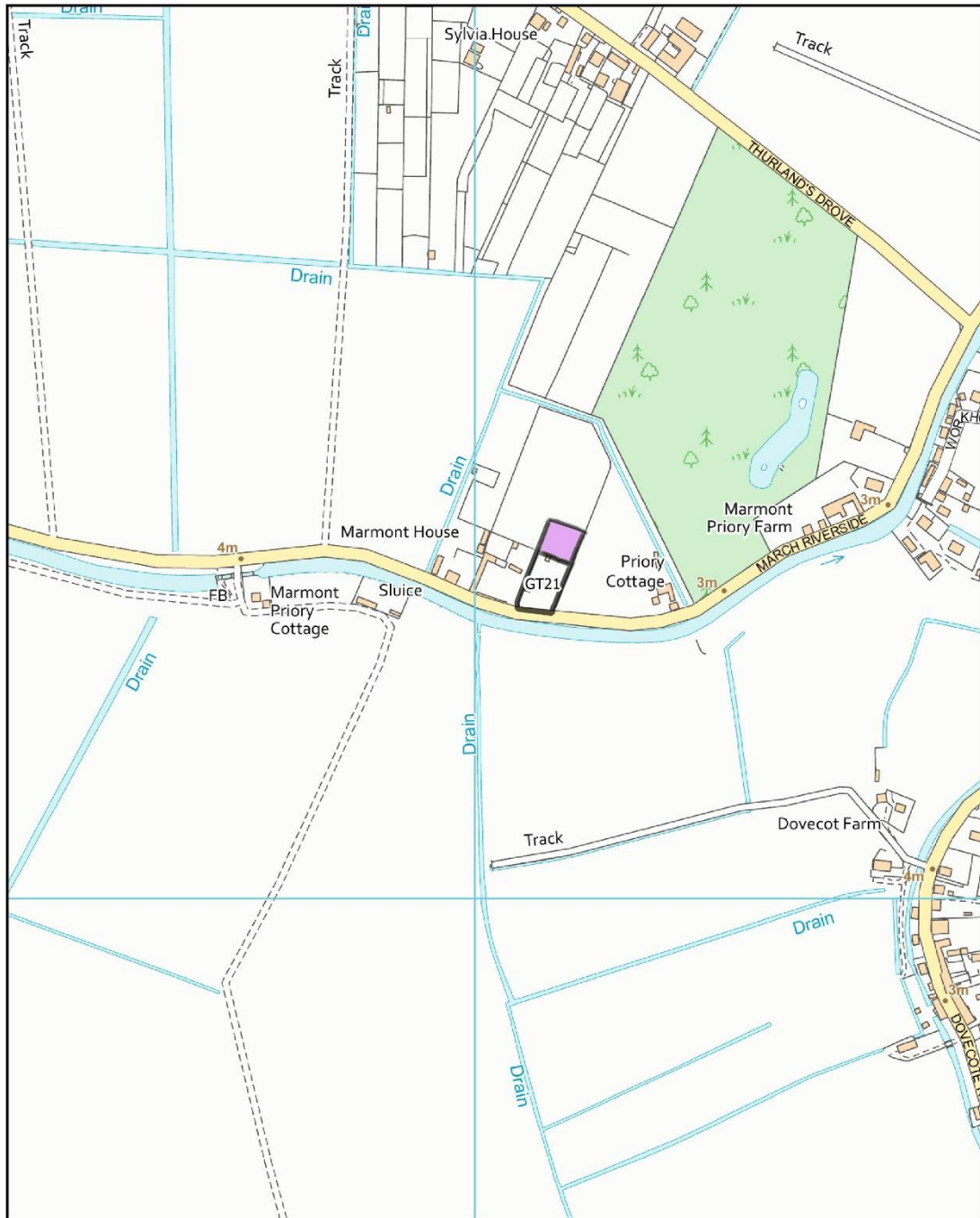


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Ordnance Survey AC0000819234

08/12/2023

Proposed extension to GT21 (purple highlighted area)



Borough Council of
**King's Lynn &
West Norfolk**
Tel. 01553 616200

GT21

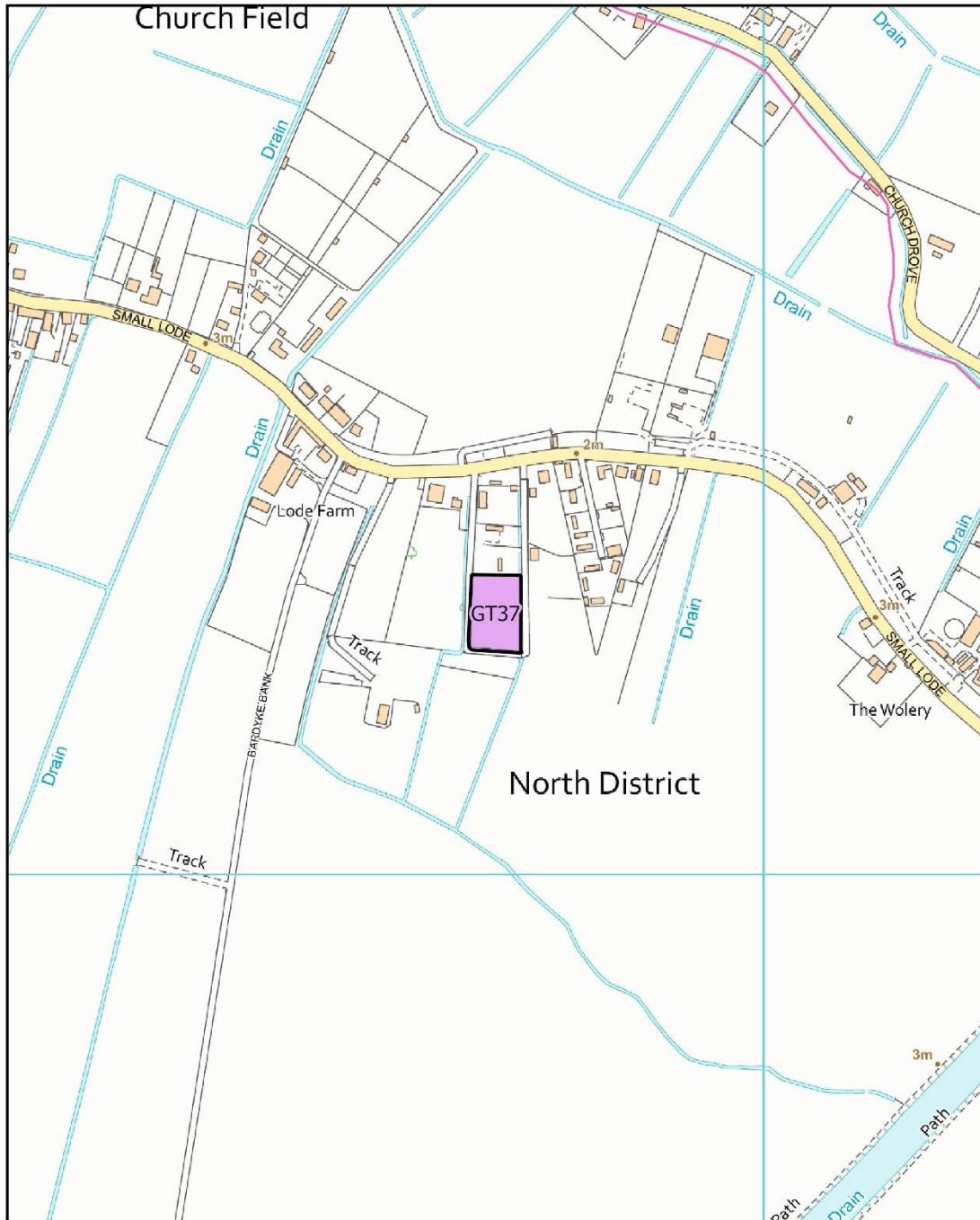


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28/07/23

Land at GT37, Small Lode, Upwell (purple highlighted area)



Borough Council of
**King's Lynn &
West Norfolk**
Tel. 01553 616200

GT37

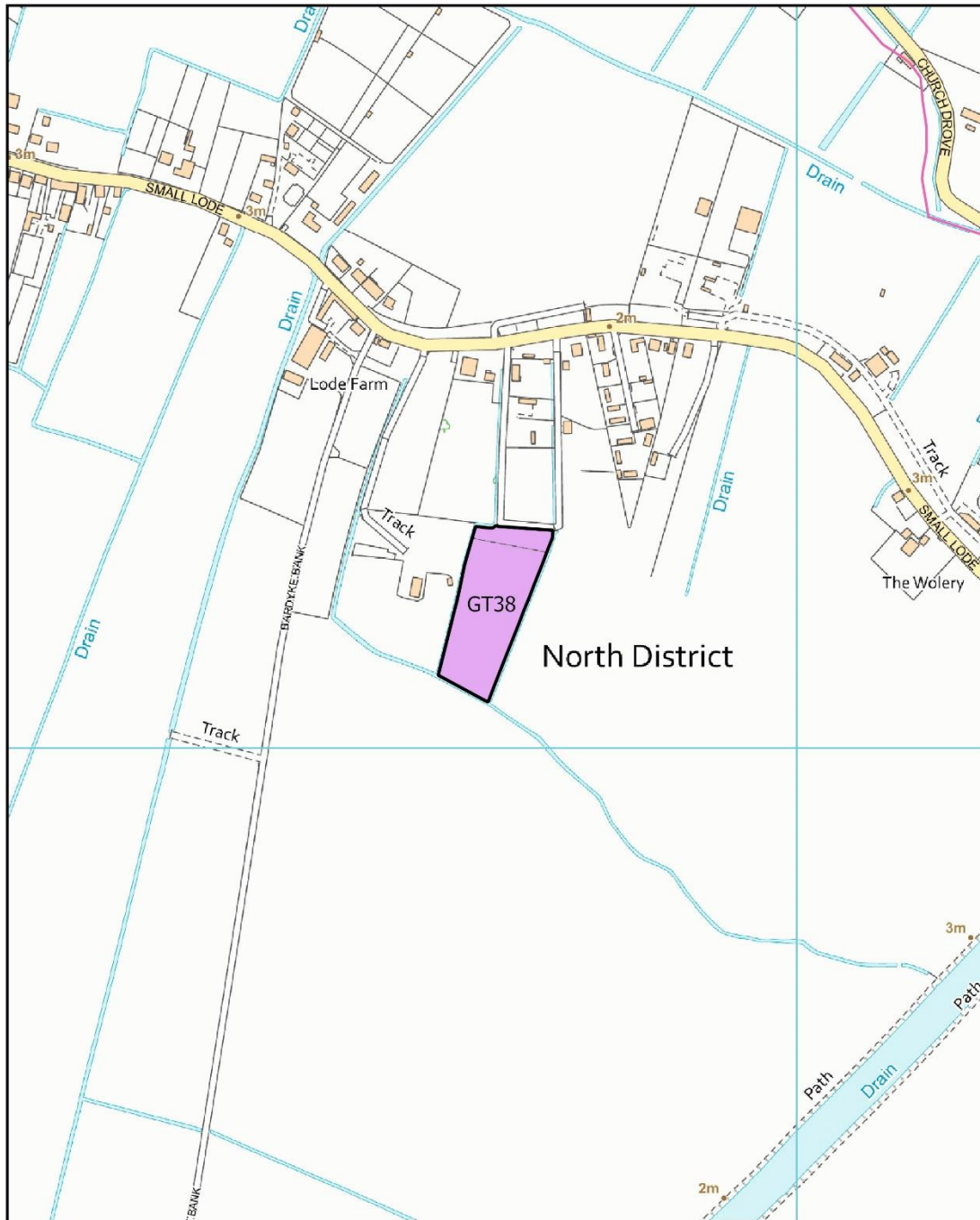


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08/12/2023

Land at GT38, Small Lode, Upwell (purple highlighted area)



Borough Council of
**King's Lynn &
West Norfolk**
Tel. 01553 616200

GT38

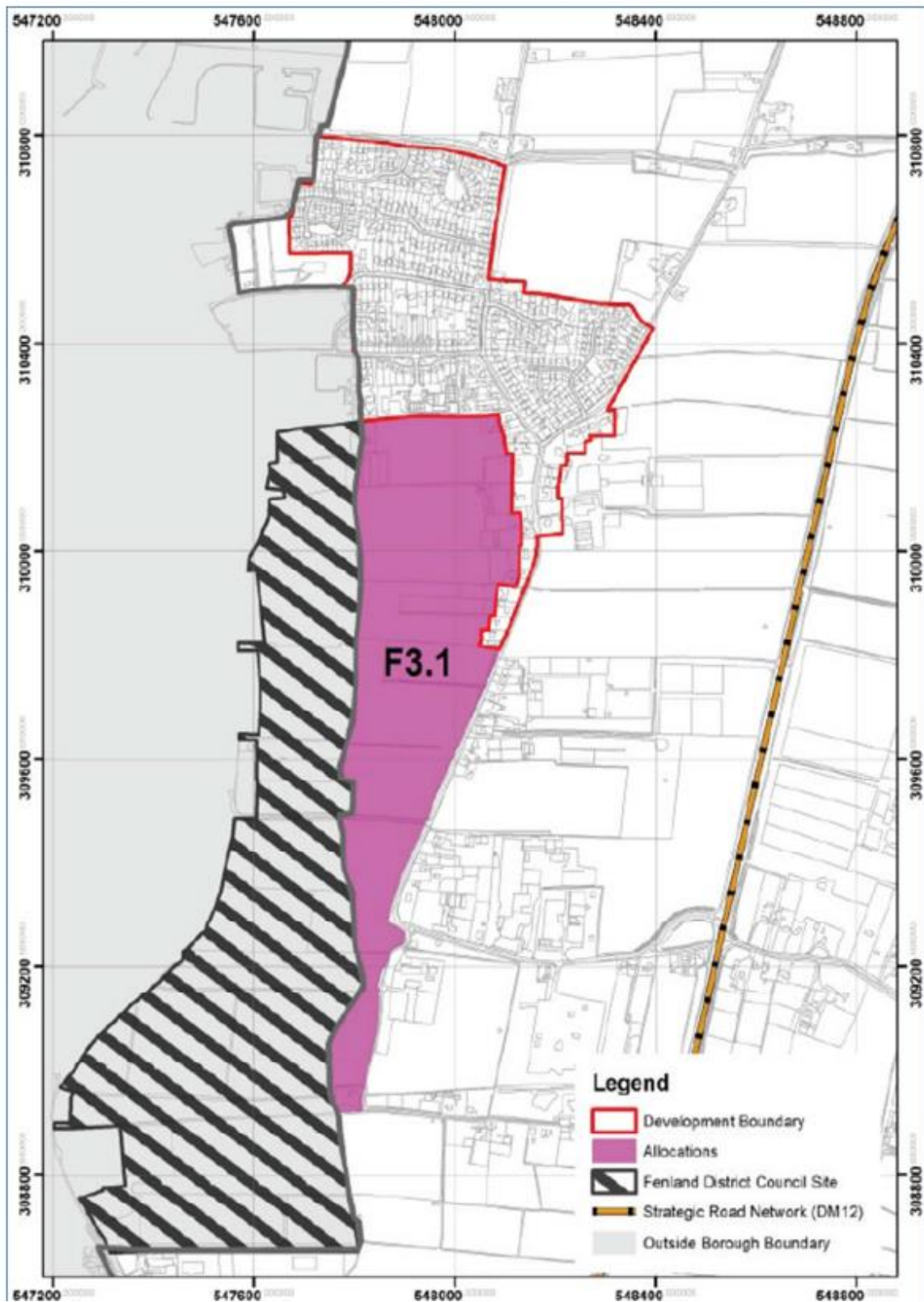


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08/12/2023

Land at Wisbech Fringe (purple highlighted area)



10. How to Respond to this Consultation?

- 10.1 This consultation document was approved by the Borough Council Cabinet on 15 January 2024 ([Agenda for Cabinet on Monday, 15th January, 2024, 6.00 pm \(west-norfolk.gov.uk\)](#)), allowing it to be published for full 6-weeks public consultation. This is also supported by the following supporting evidence base documents, which will similarly be subject to public consultation:
- Gypsy and Traveller Site Assessments (January 2024)
 - Gypsy and Traveller Level 2 Strategic Flood Risk Assessment (SFRA) for potential site allocations (January 2024)
 - Sustainability Appraisal update (Gypsy and Traveller Preferred Site Allocations), January 2024
- 10.2 This consultation will inform the Inspectors in understanding issues affecting the allocation of sites for Gypsies, Travellers and Travelling Showpeople through the Local Plan and setting agendas for examination hearings sessions, anticipated to take place in July 2024. Full details of the consultation are set out in the [Local Plan examination web page](#).
- 10.3 In preparing your response, please note the following:
- Representations can only relate to this consultation document or the three supporting evidence base documents above. Representations on other aspects of the Local Plan will be discounted.
 - The Inspectors are conducting the Local Plan Examination with reference to legal requirements and the tests of soundness; that the Plan is positively prepared, justified, effective and consistent with national policy ([NPPF, paragraph 35](#)).
 - Your submissions will be used by the Inspectors to inform and set agendas for the Gypsy, Traveller and Travelling Showpeople Examination Hearing sessions (anticipated July 2024).
 - Representations will be published on this web page, although all personal information (except for names and organisation name, where appropriate) will not be published.
 - Your personal data will be managed in accordance with our commitments under data protection legislation and our [data protection policy](#).
 - **Comments within representations will normally be published in full unless these contain statements or other materials that are derogatory, discriminatory or inappropriate in content. In such instances representations may be disregarded.**
- 10.4 The consultation will run for 6 weeks, starting on Friday, 26 January. To be considered, representations must be received, at the latest, by **11:59pm on Friday, 8 March 2024**.
- 10.5 Representations can be submitted by:

Emailing the council at lpr@west-norfolk.gov.uk

Posting your response to the council at:

FAO: Local Plan evidence base consultation
Planning Policy Team
Borough Council of Kings Lynn and West Norfolk
Kings Court
Chapel Street
Kings Lynn
Norfolk PE30 1EX

- 10.6 Finally, please note that the consultation ends at **11.59pm on Friday, 8 March 2024**. Please note that only comments received by this time can be taken into account. Any comments made after the consultation period may not be considered. Please do not hesitate to contact the Planning Policy team (planning.policy@west-norfolk.gov.uk) if you have any further queries.



Stage 2 - Full Equality Impact Assessment Form

1. What is the service area(s) and who is the lead officer?

- List the Executive Director and Service Manager, plus the person completing this assessment if different. Geoff Hall, Stuart Ashworth and Luke Brown

The proposed sites and policy form part of the wider policy requirements (under the National Planning Policy Framework) for the ongoing examination of the emerging Local Plan for Kings Lynn and West Norfolk. Once adopted, the Local Plan (including the policy for the provision for Gypsies and Travellers) will replace existing policy for the provision for Gypsies and Travellers currently identified in the Core Strategy.

The proposed policy seeks to support the Local Plan's progression through its examination and enable the Council to successful meet its wider policy and legal obligations.



2. What change are you proposing?

The Council has a legal duty under the Housing Act 2004 and through the National Planning Policy Framework (NPPF) to accommodate the housing needs of the borough, including those for Gypsies and Travellers and Travelling Showpeople.

Paragraph 62 of the NPPF states that '*Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, **travellers**, people who rent their homes and people wishing to commission or build their own homes*'.

Having a lack of supply of permanent accommodation can adversely affect the travelling community. Providing enough suitable accommodation improves the ability to meet other primary needs, especially education and health. Accommodation also enables Gypsy and Travellers to continue to live a nomadic life, in line with their culture and traditions. It also enables greater access to employment opportunities for families to remaining together.

The provision of suitable permanent accommodation also reduces the risk of unauthorised encampments across the borough.

The Council is seeking to provide enough land to meet the accommodaton needs for the Gypsy and Traveller community over the period to 2039. This will be through a combination of sites and locations to site future provision and planning policies to manage new development proposals as they come forward.

This will be a key decision by elected members moving forward in 2024.



3. How will this change help the council achieve its Corporate Strategy priorities (and therefore your Directorate/service objectives)?

The consultation document aims to enhance the 'Support our communities' objective within the Corporate Strategy 2023. This will support the health and wellbeing of our communities, help prevent homelessness, assist people with access to benefits advice and ensure there is equal access to opportunities.

We will:

- Increase the number of good quality new homes and associated infrastructure built through direct provision by working with registered social landlords and private sector developers. The Policy will provide space for additional Gypsy and Traveller pitches and plots and accommodation. This will increase the supply of accommodation for the community where it is required.
- encourage private sector housing development that supports local need, delivers on local infrastructure and meets environmental and biodiversity requirements, The policy will support and encourage the development of both private family pitches/sites and social sites to best meet the identified need of the Gypsy and Traveller community in West Norfolk.



4. What is your evidence of need for change?

To understand the level of need required for the Gypsy and Traveller community, the Council produced a Gypsy and Traveller Accommodation Assessment in May 2023. This document identified that there is a need for:

Gypsy and Traveller Accommodation Requirements to 2039

Year Period	Dates	Need (number of pitches)
0-5	2023-2027	71
6-10	2028-2032	10
11-15	2033-2037	11
16-17	2038-2039	5
0-17		97

**the accommodation need has been reduced from the original GTAA to reflect recent planning decisions.*

Gypsy Traveller and Travelling Showpeople Accommodation Requirements to 2039

Year Period	Dates	Need (number of plots)
0-5	2023-2027	4
6-10	2028-2032	0
11-15	2033-2037	1
16-17	2038-2039	0
0-17		5

Currently, the Council cannot meet these needs under its existing policy framework and is therefore not compliant with the provisions of National Planning Policy and other legislation such as the Housing Act 2004.

It is critical that the Council addresses this issue through the ongoing Local Plan examination so that the Local Plan can be found 'sound' and the Council meets its legal obligations under national planning policy and other legislation.

The proposed consultation document seeks to demonstrate how the Council seeks to meet these accommodation needs for the Gypsy and Traveller community over the plan period.



5. How will this change deliver improved value for money and/or release efficiency savings?

Providing a policy framework for accommodating the needs for Gypsies and Travellers will enable pitches to come forward in a planned and sustainable way to meet the identified accommodation needs of the Gypsy and Traveller Community. Planned development reduces the likelihood of unauthorised encampments, which in turn reduces planning enforcement cases and planning appeals on such sites. This will save the Council time in determining planning applications, reduce time spent on planning enforcement and lead to less planning appeals in the future.

6. What geographical area does this proposal cover?

The proposed sites and policy affect all of the Borough, although the individual sites identified will affect some communities more than others. The proposed sites for accommodating Gypsies and Travellers are located in:

- Tilney St Lawrence
- Walpole St Andrew
- Upwell
- South Creake
- Hockwold cum Wilton
- Whittington
- Outwell
- Walsoken
- Wiggenhall St Mary Magdalen
- Methwold
- Wisbech Fringe
- Walton Highway
- Syderstone



7. What is the impact of your proposal?

The document proposes to allocate a number of sites across the borough to accommodate the needs for the Gypsy and Traveller community. The majority of this need will be accommodated on existing sites, where appropriate, to address direct needs arising from specific sites.

37 pitches can be accommodated through intensification of existing sites at:

- GT05 19 - 121 Magdalen Road, Tilney St Lawrence
- GT11 Homefields, (Western Side, Goose Lane), Walpole St Andrew
- GT17 Land at The Lodge, Small Lode, Upwell
- GT18 Land at 2 Primrose Farm, Small Lode, Upwell
- GT20 Land at Botany Bay, Upwell
- GT21 Land at Four Acres, Upwell
- GT28 Many Acres (Smithy's Field), Small Lode, Upwell, Norfolk
- GT34 Land at Creaksville, South Creak
- GT35 Land at Green Acres, Upwell
- GT39 Land at Oak Tree Lodge, The Common, South Creak
- GT42 Land at Red Barn, Cowles Drove, Hockwold cum Wilton
- GT54 Land at the Pines, Whittington
- GT55 Land at Victoria Barns, Basin Road, Outwell
- GT56 Wheatley Bank, Walsoken (South of Worzals parallel to A47)
- GT59 Land at Spriggs Hollow, Wiggshall St Mary Magdalen
- GT66 Land at Brandon Road, Methwold

4 pitches through the authorisation of pitches on existing sites at:

- GT09 The Stables, Walpole St Andrew
- GT33 Land Next to Clydesdale, Biggs Road, Walsoken
- GT43 Homefield, Common Rd South, Walton Highway
- GT59 Spriggs Hollow, Wiggshall St Mary Magdalen

11 pitches at two new sites at:

- Station Road, West Dereham
- Land to the West of Country Park Travellers Site Wheatley Bank, Walsoken

With any remaining need likely to be accommodated at one or more of the following broad locations:

Land to the rear of West Walton Court, Blunts Drove, Walton Highway (Public Site), Land to the rear of The Lodge, Small Lode, Upwell, Land to the rear of 2 Primrose Farm, Small Lode, Upwell, Land to the rear of Four Acres, Upwell, Land to the rear of Green Acres, Small Lode, Upwell, Land to the rear of Green Acres, Small Lode, Upwell, Land at Wisbech Fringe Strategic Allocation.



Those existing sites have access to basic services such as water, electricity and sewage. There are also dayrooms and toilet blocks available on these sites. Any new sites would need to accommodate such infrastructure provision within their development. Their more remote locations mean access to wider education and health services are more limited. The Council will seek to improve access to such services through this Policy. On site facilities and accommodation will also be conditioned through the planning process to make sure they're suitable in terms of accessibility and up to building standards.

The general accommodation needs for the Borough are in response to overcrowding on existing sites and teenagers living with family will need their own pitches in the future. New accommodation provision will enable those younger people or those who are living in overcrowded conditions to have their own pitch/plot. It also enables family member to remain with their wider family on existing sites.

The intensification of existing sites and/ or new sites will provide a positive impact in terms of meeting accommodation needs for Gypsy and Travellers, but could lead to some negative impact on existing communities in terms of an impact on existing infrastructure and the environment. Where such constraints are identified, the Council will seek to minimise any negative impacts through the selection of the most suitable locations which will have the least impact on existing communities.

The proposed policy also reduces conflict in terms of enabling the expansion of existing sites thereby reducing the likelihood of planning enforcement or legal cases in the future. The risk is greater if the accommodation needs of the Gypsy and Traveller Community are not met. Therefore, steps to mitigate potential negative impacts are critical.

It promotes equality in terms of enabling the community to have access to accommodation in line with other forms of accommodations needs as identified in the Local Plan.



8. What data have you used to support your assessment of the impact of your proposal?

The primary objective of this GTAA is to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in King's Lynn & West Norfolk Borough Council (the Council) area.

As well as updating previous GTAAs, the assessment provides a robust and credible evidence base which can be used to aid the implementation of Local Plan Policies and, where appropriate, identify the provision of new Gypsy and Traveller pitches and Travelling Showpeople plots for the plan period 2023 to 2039. This will enable the Council to meet the 15-year requirements set out in Planning Policy for Traveller Sites (PPTS). The outcomes of this study supersede the outcomes of any previous GTAAs for King's Lynn & West Norfolk Borough Council.

The GTAA has sought to understand the accommodation needs of the Gypsy, Traveller and Travelling Showpeople population in the Council area through a combination of desk-based research, stakeholder interviews, and engagement with members of the Travelling Community living on all known sites, yards, and encampments.

A total of 141 interviews or proxy interviews were completed with Gypsies and Travellers living on sites and on the roadside in King's Lynn & West Norfolk, and a total of 15 interviews were completed with Travelling Showpeople. No interviews were completed with households living in bricks and mortar.

A total of 5 stakeholder interviews were also completed. These included Norfolk County Council, Breckland DC, Fenland DC, South Holland BC and North Norfolk DC.

The fieldwork for the study, including the interviews, was completed between January 2023 and May 2023, and the baseline date for the study is May 2023.

This data and information is publically accessible in the GTAA which is published on the Council's website.

This data was then used to help inform the assessment of sites, The finalised list of proposed sites are those where a direct accommodation need is present and/ or where there is room for expansion.



9. What consultation has been undertaken/will need to be undertaken with stakeholders/ groups directly or indirectly impacted by the proposals and how do you intend to use this information to inform the decision?

Stage 1 of the process was to prepare the Consultation Document which included discussions and consultation with relevant internal and external statutory consultees, neighbouring authorities on existing issues.

Stage 2 of the process is to seek the views and opinions of the wider public. All responses from this public consultation will be reviewed and these will help inform the final consultation document which will be subject to a decision at Full Council in March 2024. A separate Consultation Statement will detail all responses received and how the Council has sought to address any concerns or issues raised.

10. Are there any implications for other service areas?

The proposed sites and policy consultation will have implications for Housing Standards Service in terms of providing comments to consultations and planning applications for Gypsy and Traveller provision.

Communications Service in terms of supporting the planning service through communicating and promoting public consultations.

Planning service in relation to their time and resource in determining future planning applications.



11. What impact (either positive or negative) will this change have on different groups of the population?

The Council are required to meet all accommodation needs for the borough through the Local Plan. This does include other groups and communities such as accommodation for older people, affordable housing and specialist housing for people with disabilities. The Local Plan is already proposing policies for these areas and are currently subject to Government examination.

The proposed sites and policy for Gypsy and Travellers will have a positive affect on the Gypsy and Traveller community. It seeks to address their current unmet accommodation needs and enable planning proposals for such accommodation to be determined through more up-to-date policy. It enables the Local Plan to adequately address the accommodation needs for this area along with other accommodations policies as mentioned previously.

The document also seeks to address their individual accommodation needs – specifically where a localised need has been identified on existing sites. This need is largely a result of existing family members or teenagers seeking their own pitches/plots, but currently have no where to go.

The location of sites is broadly in those locations where the Gypsy and Traveller community wish to stay.

The policy will likely have some negative impact on those existing communities where there are proposals to intensify or identify new sites and locations for Gypsy and Traveller accommodation. These impacts are likely to include impacts to existing infrastructure – especially where existing communities are small in size, impacts to the character of these area in terms of their built form and impacts to the environment, where new sites or extensions to existing sites are proposed on greenfield land.

The Council is confident however that any negative impacts can be mitigated through the siting and design of these sites/developments and also through the proposed criteria based policy for assessing planning applications for Gypsy and Traveller accommodation.



12. Other Staff Involved in Assessment (including Corporate Equality Group Representatives), and comments from Equality Work Group Reps

- Stuart Ashwork – Assistant Director for Planning
- Michael Burton – Principal Planning Policy Officer
- Members of the Corporate Equality Working Group, who have been consulted with and contributed to the full impact assessment as presented. The group is mindful that this relates to a proposal to commence a consultation process prior to final proposals going forward to Full Council in April 2024. The group would wish to be involved in further discussions to produce a final full impact assessment which takes into consideration any issues identified as a result of the consultation process, before the report is received by Full Council.



Full EIA Action Plan

Risk/adverse impact identified (Q11)	Action to be taken to mitigate	By who <i>Include a lead officer for implementing the actions</i>	By when <i>Deadlines/timescales for implementing the actions</i>	Monitoring mechanism <i>What indicators will you use to track the impact of the change when implemented? How will you review its implementation? How do you intend to monitor service take-up?</i>
Impact to existing communities for the proposed sites and locations	A public consultation period is planned so that the wider public and other can review the policy and provide feedback to the Council.	Planning Policy	26 th January until 8 th March 2024	The policy will form part of the monitoring framework for the Local Plan.

231

Assessment Completed By: Luke Brown – Planning Policy.



Job Title:

Date:

232

Gypsies, Travellers and Travelling Showpeople Sites and Policy Consultation (January 2024)

Borough Council of
King's Lynn &
West Norfolk



Frequently Asked Questions (FAQs)

Q: Is it necessary for the Council to allocate land to meet accommodation needs of Gypsies and Travellers?

A: Yes. This is both a legal requirement and a national planning policy requirement.

Legal requirements:

- 2004 Housing Act – places a duty on local authorities to provide sufficient accommodation for Gypsies and Travellers
- 2010 Equalities Act – protects the characteristics of Gypsies and Travellers as an ethnic group, and local authorities are required to actively seek to eliminate unlawful discrimination. Gypsies and Travellers have particular needs due to their nomadic culture.

National planning policy requirements:

- The National Planning Policy Framework (NPPF) requires local authorities to provide land to meet housing and accommodation needs for all people, including for Gypsies, Travellers and Travelling Showpeople (GTTS).
- The NPPF is supported by the 2015 Planning Policy for Traveller Sites (PPTS), which sets out what local authorities are required to do to meet the legal requirements in planning for the accommodation needs of GTTS.

Q: Why is the Borough Council now putting forward proposals to allocate land, to accommodate Gypsies, Travellers and Travelling Showpeople?

A: The council was required to undertake a specific Gypsy and Traveller Accommodation Assessment (GTAA), which was published in June 2023. This report identified a future need for an additional 102 Gypsy and Traveller pitches over the remaining Local Plan period (2023-2039). Of this, a need for 76 pitches must be provided within the first 5 years of this period (2023-2028). The GTAA also identified a need for 5 additional plots for Travelling Showpeople within the first 5 years.

Since publication of the GTAA the need for Gypsies and Travellers has reduced by 5 pitches, to 71 pitches within the first five years, as a result of appeal decisions which have been allowed.

The Planning Inspectors carrying out the examination into the council's Local Plan have directed that the allocation of sufficient land to accommodate Gypsies, Travellers and Travelling Showpeople is a necessity for the Local Plan to pass

examination, as indicated in the Planning Inspectors' 20 June 2023 letter to the Council.

Q: What happens if the Council decides not to (or is unable to) follow the requirements regarding Local Plan policies for Gypsies, Travellers and Travelling Showpeople?

A: The Inspectors wrote to the Borough Council on 20 June 2023, setting out the Council's obligations regarding planning for Gypsies and Travellers. The Inspectors' letter is clear and unequivocal, that the Local Plan must allocate land to meet the accommodation needs for Gypsies, Travellers and Travelling Showpeople identified in the latest (2023) Gypsy and Traveller Accommodation Assessment (GTAA).

Failure to do so, to the satisfaction of the Planning Inspectors, would be highly likely to lead to the Local Plan being found "unsound", thereby failing at examination. Failure at examination would lead to the failure/ loss of the Local Plan in its entirety.

Q: Where is this accommodation need coming from?

A: Kings Lynn and West Norfolk has a long-established Gypsy and Traveller community. There are over 70 existing sites across the Borough of which nearly all are privately owned. Just like the needs of other communities, the accommodation needs on some of these sites has increased. This is mostly coming from teenage children or other relatives who are, or will be, seeking their own pitch on existing family sites. This is why the Council are proposing to provide most of the current and future accommodation needs on or through extensions to existing established sites.

There is no need arising because of general inward migration.

Q: What happens if the Local Plan cannot progress further, due to the requirement to allocate land for Gypsies, Travellers and Travelling Showpeople?

A: As stated, without allocating sufficient land to meet the identified need, then it is highly likely that the Local Plan will be found "unsound"; i.e. fail at examination.

In this situation there would then be little/ no up-to-date policy framework for directing development and delivering infrastructure requirements. This would **not** prevent unwanted development. Instead, the lack of an up-to-date Local Plan would likely lead to "planning by appeal", whereby the Borough Council could not demonstrate 5-year development land supplies. In this case it is likely that unwanted/ undesirable developments would be approved (including Gypsy and Traveller sites) by Planning Inspectors (on behalf of the Secretary of State), often in locations that the Council would wish to see protected.

Q: What is the process for the Gypsies, Travellers and Travelling Showpeople work and the wider Local Plan examination, going forward?

A: The council is carrying out a public consultation exercise regarding Gypsies, Travellers and Travelling Showpeople potential site allocations options, which

will take place for 6-weeks from the 26 January to the 6 March 2024. It is emphasised that this consultation is about potential options. Following the consultation, final recommendations for site allocations will be presented to a meeting of Full Council (likely end of April 2024), to be approved for submission to the Planning Inspectors. Therefore, proposed site allocations for Gypsies, Travellers and Travelling Showpeople can only be taken forward with the specific approval of Full Council. Assuming this is approved for submission to the Inspectors by Full Council, then a timetable going forward, is then likely to be as follows:

- Winter 2023 – Confirmation by Planning Inspectors that Local Plan examination hearings can be reconvened;
- Spring/Summer 2024 – reconvened Local Plan examination hearings, including a session specifically on the Gypsy and Traveller and Travelling Showpeople policy. ;
- Autumn 2024 – Consultation on Proposed Main Modifications to the Local Plan;
- Late 2024 – Publication of Inspectors' Report;
- Early 2025 – Local Plan adoption.

Q: How were the accommodation needs of Gypsies, Travellers and Travelling Showpeople assessed?

A: The methodology for assessing needs for Gypsies, Travellers and Travelling Showpeople accommodation is set out in the 2023 Gypsy and Traveller Accommodation Assessment (GTAA). This was assessed through a series of questionnaires and engagement between the appointed consultant (ORS) and travelling communities. Most need has arisen from the creation of new households/ family units coming of age, from established communities. The study was carried out in accordance with current best practice guidance.

Q: Where is the accommodation need for Gypsies, Travellers and Travelling Showpeople located in West Norfolk?

A: Accommodation needs are mostly localised, as these arise from existing communities. 72% of the need for Gypsies and Travellers is identified in three parishes – Outwell, Upwell and Walsoken. For Travelling Showpeople, the outstanding need has arisen from existing sites at Methwold and Northwold.

It is emphasised that the overwhelming need for Gypsies and Travellers is situated in the area of the Fens around Wisbech. This is reflected in the proposed site allocations.

Q: Are the sites, locations and policies within the consultation document subject to, or likely to, change?

A: Yes. These policies and potential site allocations are only draft/ indicative at this stage. All feedback from the forthcoming consultation (January – March 2024) will be reviewed and used to update documents where appropriate before the Council makes its final decisions.

Q: Are the pitch and plot numbers subject to change?

A: Yes. The Gypsy and Traveller Accommodation Assessment (GTAA) sets out the defined need, as at summer 2023. This has already reduced due to recent appeal decisions (i.e. reduction by 5 Gypsy and Traveller pitches), and could change further if there are further approvals, either through planning applications, or appeal decisions allowed.

These pitch/ plot numbers are therefore only indicative at this stage and may be subject to further change following the consultation.

Q: Why does the consultation document propose more than the minimum requirement/ identified need proposed?

A: As the Council has not yet made a final decision on the locations of site allocations or detailed policy wordings, all reasonable options are subject to consultation. This enables flexibility and would allow for the Council to still meet its obligations if any of the potential site allocations were to be discounted through the consultation.

Q: Who will be consulted?

A: In accordance with the Statement of Community Involvement, all statutory consultees and interested parties will be consulted, subject to the requirements of the 2018 Data Protection Act.

Q: How and when can I respond to the consultation?

A: The consultation will commence on Friday, 26 January 2024, running for 6 weeks (closing date, Friday, 8 March 2024). Details will be set out on the Local Plan examination web page:

- https://www.west-norfolk.gov.uk/info/20079/planning_policy_and_local_plan/951/local_plan_review_2016-2036_examination).

To assist the consultation, there will be a representation form. This should be used, to ensure we can capture the information required to allow us to process your response. Please note that representations must be received within the 6-weeks period to be considered.

REPORT TO CABINET

Open		Would any decisions proposed:			
Any especially affected Wards	Discretionary	Be entirely within Cabinet's powers to decide		YES	
		Need to be recommendations to Council		NO	
		Is it a Key Decision		YES	
Lead Member: Cllr Alistair Beales E-mail: cllr.alistair.beales@west-norfolk.gov.uk			Other Cabinet Members consulted: Cabinet		
			Other Members consulted: E&C Panel		
Lead Officer: Jemma Curtis E-mail: jemma.curtis@west-norfolk.gov.uk Direct Dial: 01553 616716 Lead Officer: Nicola Cooper E-mail: Nicola.cooper@west-norfolk.gov.uk			Other Officers consulted: Executive Director (place), Assistant Director Housing, Regeneration & Place.		
Financial Implications Yes	Policy/ Personnel Implications No	Statutory Implications NO	Equal Impact Assessment YES If YES: Pre-screening/ Full Assessment	Risk Management Implications No	Environmental Considerations Yes
If not for publication, the paragraph(s) of Schedule 12A of the 1972 Local Government Act considered to justify that is (are) paragraph(s)					

Date of meeting: 15 January 2024

WEST NORFOLK INVESTMENT PLAN (UK SHARED PROSPERITY FUND) AND RURAL ENGLAND PROSPERITY FUNDING: PROGRAMME UPDATE AND 2024/25 PRIORITIES

<p>Summary</p> <p>At its meeting on 7 February 2023, Cabinet approved the programme of investment for UK Shared Prosperity Funding (UKSPF) for 2022/23 and 2023/24 and for Rural England Prosperity Funding (REPF) for 2023/24 and 2024/25. This report sets out the proposed spending priorities for UKSPF in 2024/25 to facilitate both continued programme delivery and the introduction of new projects.</p> <p>Additionally, the report provides a review of REPF programme delivery including a forward look to 2024/25 and procedures in place to ensure full investment spend by 31 March 2025.</p> <p>For both funding programmes it is essential to agree the best approach for expediting any 'in year' programme adjustments that may become necessary to ensure achievement of full spend in 2024/25 by the government deadline of 31 March 2025.</p> <p>Recommendation</p> <p>Cabinet is recommended to:</p> <ol style="list-style-type: none"> 1. Approve the projects for allocation of UKSPF funding of £1,062,709 for 2024/25 against the agreed interventions contained in the West Norfolk Investment Plan (WNIP) as set out in section 3 and 4. 2. Approve the REPF funding of £225,000 for Active Travel projects in 2024/25 as set out in Table 6
--

3. Delegate authority to the Assistant Director for Regeneration, Housing & Place in consultation with the Portfolio Holder for Business to approve in year budget reallocations of UKSPF funding for 24/25 to ensure fulfilment of spend. (Section 7).

Reason for Decision

To ensure timely delivery of two complementary government grant funding streams in line with government guidance, West Norfolk Investment Plan, the Rural Addendum and Corporate Business Plan objectives. The UKSPF will support residents and business to; build pride in place, high quality skills training, supporting pay, employment, productivity growth and increasing life chances. REPF will support investment in micro and small enterprises in rural areas and in the development and promotion of the rural visitor economy, enhancing active travel provision in rural areas, investing in capacity building and infrastructure support for local rural groups and supporting volunteering and social action groups in rural communities.

1. Background

- 1.1 UK Shared Prosperity Funding (UKSPF) investment supports the government's commitment to levelling up all parts of the UK and is administered via the Department for Levelling Up Housing and Communities (DLUHC). On 6 December 2022, Government approved a capital and revenue allocation of UK Shared Prosperity Funding for King's Lynn and West Norfolk of £1.836m for three years 2022-2025. This funding was awarded against the priorities identified within the West Norfolk Investment Plan (WNIP), as approved by Cabinet in July 2022 (see section 2). This plan provides a framework for local investment of UKSPF to support local strategies and existing partnerships, and draws on the experience of previous programmes and investment delivery.
- 1.2 Rural England Prosperity Funding (REPF) is a two year top up to UKSPF to address the particular challenges that rural areas face from 2023-2025. This is a DEFRA fund and is administered by DLUHC. A Rural Addendum, which sets out the additional rural specific priorities for West Norfolk, over and above that established as part of the West Norfolk Investment Plan, secured an allocation of £1,496,455 from the Rural England Prosperity Fund on 6 April 2023, in addition to the UKSPF award. REPF provides capital funding only, must be invested into eligible rural areas as defined via [DEFRA's Magic Map](#), and must be spent on lasting assets such as buildings or equipment.
- 1.3 The Borough Council is the 'Lead Local Authority' (LLA) for the management, delivery and administration of UKSPF and REPF investment across King's Lynn and West Norfolk. The funds can be used to complement both each other and alternative government funding streams including Towns Fund, Levelling Up Fund and other national employment and skills funding support. The funding cannot be used for statutory provision and REPF cannot be invested into projects that have been in receipt of other DEFRA funding.
- 1.4 Since the government's approval of the UKSPF WNIP in December 2022, the Regeneration & Economic Development team have been progressing delivery of UKSPF & REPF in accordance with the programme approved by Cabinet in February 2023. In determining the priorities for 2024/25, the team have evaluated the successful delivery to date, any lessons learnt, engaged with

stakeholders through the SPF Partnership Group and considered the priorities identified in the new Corporate Strategy,

2. West Norfolk Prosperity Funding: Local Investment Priorities and Interventions

2.1 The West Norfolk Investment Plan (WNIP), which guides local investment of Prosperity Funding, sets out local priorities across four key themes:

Table 1: West Norfolk Investment Plan: Priorities for Investment

<p>Leading as a Centre of Excellence for the Visitor Economy</p> <ul style="list-style-type: none"> • With a culture-led approach to leverage culture & heritage assets • Positioning King’s Lynn & West Norfolk as Cultural Destination • Driving innovation & productivity in Tourism & Hospitality 	<p>Embedding approaches that are Active, Clean & Green</p> <p>With benefits for residents and local businesses:</p> <ul style="list-style-type: none"> • Protecting/enhancing natural environment • Domestic efficiency/sustainability • Transport to get to and from work • Business transformation and re-training
<p>Strengthening local enterprise and innovation systems</p> <p>Sector wide, but with specific focus on sector/workforce/value chain strengths:</p> <ul style="list-style-type: none"> • Food (agriculture, food processing & manufacturing, food service & retail) • Manufacturing • Health 	<p>Supporting people to access opportunities.</p> <ul style="list-style-type: none"> • Creating better quality, higher skilled jobs across sectors • Supporting people into employment and volunteering opportunities • Improving skills that employers need

2.2 UKSPF includes three investment priority areas:

- Communities & Place,
- Local Businesses,
- People & Skills.

The first two priority areas form part of the UKSPF programme across all three years, whilst People & Skills comes into play in 2024/25 only. A ‘menu’ of interventions sits underneath each of these priority areas and the most appropriate interventions (denoted by E numbers) were locally selected as part of the West Norfolk Investment Plan to align with the identified local priorities (Table 2). Local investment across the 2022-2025 programme is guided by these intervention areas and is measured by associated UKSPF outputs and outcomes; metrics that are measured locally to demonstrate investment impact.

Table 2: West Norfolk UKSPF Priorities and Intervention Areas.

<p>UKSPF Investment Priority: COMMUNITIES & PLACE</p>
<p>E1: Improvements to town centres & high streets including better accessibility</p>

- E6: Local arts, cultural, heritage & creative activities
- E9: Impactful volunteering and/or social action projects
- E13: Community measures to reduce the cost of living
- E14: Relevant feasibility studies

UKSPF Investment Priority: LOCAL BUSINESS

- E17: Development & promotion of visitor economy
- E19: Investment in research & development at the local level
- E23: Strengthening local entrepreneurial ecosystems
- E29: Supporting decarbonisation
- E30: Business support measures to drive employment growth

UKSPF Investment Priority: PEOPLE & SKILLS

- E33: Employment support for economically inactive people
- E34: Courses including basic, life & career skills
- E37: Tailored support for the employed to access courses
- E38: Local areas to fund local skills needs

- 2.3 REPF includes two investment priority areas: Rural Communities and Rural Businesses. As with UKSPF, a selection of interventions sits underneath both priority areas and, as part of the consultation and evidence analysis in setting out the challenges and opportunities facing the rural areas in West Norfolk in the rural addendum, the following REPF interventions were locally selected based their alignment with local priorities. Rural investment is also measured by associated outputs and outcomes.

Table 3: West Norfolk REPF Priorities and Intervention Areas.

REPF Investment Priority: RURAL COMMUNITIES

E7: Active Travel Enhancements in the local rural area e.g. creation of new footpaths and cycleways/ upgrading of existing footpaths and cycleways, particularly in areas of health need.

E11: Community grants for capacity building & infrastructure support for local civil society and community groups e.g. net zero infrastructure, catering kitchens in community hubs, resilience infrastructure to protect against natural hazards.

E9: Community Grants for impactful volunteering & social action projects to develop social and human capital in local places e.g. purchase of equipment, premises improvements to enable groups to operate.

REPF Investment Priority: RURAL BUSINESSES

REPF: Small scale investment in micro and small enterprises in rural areas e.g. net zero infrastructure, diversification of farm businesses, creation/ expansion of rural leisure and tourism, investment in food processing equipment, resilience infrastructure to protect businesses against natural hazards.

E17: The development and promotion of the visitor economy e.g. development of local visitor trails and infrastructure such as information boards and visitor centres, development of local tourist attractions and visitor experiences based on the local offer.

3. UKSPF Programme 2024-25

- 3.1 UKSPF provides the flexibility for places to invest across a range of activities which represent the right solutions to the locality. The WNIP identified the interventions, outputs and outcomes that we aim to deliver to best meet the priorities identified in Table 2 for the period 2022-25. At the stage of developing the WNIP there was no requirement to identify specific projects to be delivered under the interventions. In February 2023 cabinet approved a programme of proposed UKSPF investment for 2022 – March 2024. It is now necessary for Cabinet to review a final programme of investment for the period from April 2024 to March 2025.
- 3.2 The projects proposed for UKPSF investment in 2024/25 are set out in Table 4 with an indicative funding allocation against each project, subject to procurement processes where applicable. The projects identified for 2024/25 are those that are considered deliverable in terms of spending and capacity to achieve UKSPF outputs and outcomes and align with existing projects and priorities already underway. The 2024/25 UKSPF allocation includes a minimum capital threshold of 20%.
- 3.3 The projects identified have been evaluated against our priorities set out in section 2. Table 4 shows allocation of UKSPF funding for projects within each of the investment priority areas of Communities & Place, Local Business, and People & Skills.
- 3.4 Investment in the UKSPF People & Skills priority and associated interventions commences in 2024/25. This is reflective of the WNIP funding profile (2.2). Two project allocations within this investment priority area for 2024/25 have already been approved by Cabinet on 31 October 2023 for the Boost project and Year 2 of the West Norfolk Training Grants project. Table 4 sets out project recommendations for the remaining budget allocation under People & Skills.
- 3.5 Part of the 2024/25 programme represents a continuation of 2022-24 projects with the addition of new projects which are currently under development. Projects/programmes which received UKSPF funding in 2023/4 have been required to submit quarterly monitoring and evaluation returns with their claims to ensure delivery against the agreed outputs and outcomes is being achieved. Appendix 1 details the outputs and outcomes achieved to date from projects that have received funding in 23/24 and support is proposed into 24/25.
- 3.6 Project calls and project establishment will be expediated within the last quarter of the 2023/24 financial year to facilitate efficient final year delivery. The indicative funding allocations against each project are subject to some level of movement as project plans develop and delegated authority is sought based on in principle allocations and the priority project areas identified.

Table 4: Summary of UKSPF Projects for 2024-25

	COMMUNITIES & PLACE APRIL 24 – MARCH 25	Delivery method	REVENUE	CAPITAL	TOTAL
E1	Rail to River Art Trail A Town's Fund project to improve the quality of the public realm between the railway station and the river. UKSPF investment provides additionality specifically within the Purfleet Street area.	Direct delivery		£2,000	£2,000
E1	Love Your Town A grant scheme for projects which encourage activity in the three town centres, help generate footfall and a create wider sense of pride.	Partnership with Norfolk County Council	£9,000		£9,000
E1	The Place Pop Up Shop and Business Hub (Improvements to town centres & high streets) Low cost pop-up space in King's Lynn for developing businesses to test markets and receive business support, the provision of hot desk and meeting facilities, cultural activities and a one stop shop for multi-agency provision. Addition of part time support role, match funded by KL BID, included in 2024/25.	Third Party - King's Lynn Business Improvement District	£6,264		£31,500
E6	Riverfront Cultural Programme Funding allocation towards Riverfront Cultural Programme Phase 2: Establishment of a Placemaking strategy and development of a programme of priority projects	Direct Delivery	£16,000		£16,000
E6	Guildhall Activity Programme Grant contribution to continue the role of the learning & engagement officer and fund a programme of cultural, performances and art-based experiences and opportunities	Direct Delivery	£30,000		£30,000
E9	Maximising King's Lynn's Heritage Seed funding to support development of wider programme with partner organisations to recruit, provide training, support and coordinate volunteers of heritage assets, alongside programme of interventions to restore and rejuvenate the historic town centre.	Direct Delivery	£30,000	£50,000	£80,000
E13	West Norfolk Cycle Scheme Continuation of pilot scheme to create low cost and safe access to bicycles hosted at Lynnsport. Supported by a programme of community cycling development events.	Partnership with Alive West Norfolk	£10,000	£10,000	£20,000

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E13	NEW: Go Green (Communities) Providing professional support and advice to VCSE organisations on improving the green credentials of community buildings with the aim of reducing running costs, supporting decarbonisation and future proofing communal spaces. Grant award attached.	Partnership tbc	£44,025.52	£45,974.48	£90,000
All	NEW: Communities & Place Project Call: open call planned for February 2024 inviting organisations to submit project proposals that aligning with priorities of West Norfolk Investment Plan. See section 4. See section 4.	Project call	£92,102.72	£8,841.68	£100,944.40
			£237,392.24	£116,816.16	£354,208.40
LOCAL BUSINESS APRIL 24 – MARCH 25		Delivery method	REVENUE	CAPITAL	TOTAL
E19	Go Digital Consultancy support for businesses to help them to make better use of digital tools and grant opportunity to contribute towards implementation of the resulting digital plan. NCC match funding: 23/24 £25,000, 24/25 £18,000.	Partnership with Norfolk County Council	£18,500		£18,500
E23	The Place Pop Up Shop and Business Hub Low cost pop-up space in King's Lynn for developing businesses to test markets and receive business support, the provision of hot desk and meeting facilities, cultural activities and a one stop shop for multi-agency provision.	Third Party - King's Lynn Business Improvement District	£31,500		£31,500
E30	New Anglia Growth Hub One stop shop for business support and advice. Continued access to this service for local businesses to help them realise their highest potential and maximise opportunities.	Third party - New Anglia Local Enterprise Partnership	£145,311.51		£145,311.51
E17	NEW: Visitor Economy Improvements Funding to support implementation of priorities identified from the Tourism Informal Working Group Action Plan	Direct Delivery		£70,852.60	£70,852.60
E29	NEW: Go Green (Businesses) Providing professional support and advice to SME's, sole traders and micro businesses on improving the green credentials of enterprise spaces with the aim of reducing running costs, supporting decarbonisation and safeguarding sustainability.	Partnership tbc	£42,124.41	£45,974.48	£88,098.89

Grant award attached.

£237,435.92 £116,827.08 £354,263.00

**PEOPLE & SKILLS
APRIL 24 – MARCH 25**

Delivery method REVENUE CAPITAL TOTAL

E37	West Norfolk Training Grants Yr2 Opportunities for businesses to apply for grants up to a maximum of £3000 to fund up to 75% of training costs for employees. <i>Allocation approved at 31 October 2023 cabinet meeting.</i>	Partnership with New Anglia Local Enterprise Partnership	£22,994	£0	£22,994
E33	Boost Project Project offering grants for training to help young people in West Norfolk to access skills training to realise their potential and providing a support framework to increase the skills within the local workforce. <i>Allocation approved at 31 October 2023 cabinet meeting.</i>	Partnership with Norfolk County Council	£147,049	£0	£147,049
E38	NEW: People & Skills Project Call: Open call planned for February 2024 inviting organisations to submit project proposals that align with priorities of West Norfolk Investment Plan. See section 4.	Project call	£144,194.52	£0	£144,194.52
E38	NEW: Innovation Support for Businesses RIBA 2-3 and business case planning for the development of innovation facilities at Nar Ouse Enterprise Zone	Direct Delivery	£40,000	£0	£40,000
			£354,237.52	£0	£354,237.52

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4. Proposed Project Call for 2024/25 projects

- 4.1 Subject to Cabinet agreement of the proposed programme of investment (Table 4), a project call will be undertaken across the Communities & Place, and People & Skills investment priorities to identify high quality and deliverable projects which will meet the objectives of the West Norfolk Investment Plan in 2024/25. Proposals for projects of up to £50,000 will be considered to enable impactful investment in the final year of the programme.
- 4.2 Projects will be invited to submit proposals via an Expression of Interest stage. These will be sifted by programme officers to ensure that they fit the priorities for the West Norfolk Investment Plan and the UKSPF Prospectus and discussed with the West Norfolk SPF Programme Board before being invited to submit more detailed proposals. Final selection of projects will be agreed by the Programme Board and the Portfolio Holder for Business and projects will be awarded UKSPF support based on strategic fit, deliverability and forecasted local impact.
- 4.3 The following table provides a summary of the framework which will guide project interest. Eligible recipients of UKSPF grant support include local authorities, public sector organisations, higher and further education institutions, private sector companies, voluntary organisations and registered charities.

Table 5: Project Call 2024/25, Communities & Place and People & Skills

COMMUNITIES & PLACE: Investment to benefit residents across the borough	PEOPLE & SKILLS: Supporting growth in skills and increasing local opportunities
Specifically, projects that...	
Contribute to West Norfolk leading as a centre of excellence for the visitor economy and that embed approaches that are active, clean and green.	Improve training and progression routes across sectors, help people overcome barriers to training, create volunteering opportunities, and support high quality job creation.
This could be through...	
<ul style="list-style-type: none"> • Improvements to town centres and high streets • Local Arts, cultural, heritage and creative activities • Volunteering schemes • Social action projects • Community projects to reduce the cost of living. • Protecting / enhancing the natural environment 	<ul style="list-style-type: none"> • Training provision • Employment support schemes • Supporting quality employment provision • Community sector skills / training • Filling local skills gaps / meeting employer needs • Supporting volunteering schemes • In work training
Projects would need to:	
<ul style="list-style-type: none"> • Be located within the King’s Lynn and West Norfolk borough boundary • Provide a clear project plan • Meet local need and the investment priorities of the West Norfolk Investment Plan 	

- Deliver outputs / outcomes defined by UK Shared Prosperity Funding
- Demonstrate value for public money and financial need
- Be complete by 31 March 2025

5. REPF Programme 2024-25 (Update)

- 5.1 REPF is a capital allocation to support rural communities and businesses. Following Cabinet approval in February 2023 the programme of investment of REPF across rural West Norfolk was agreed for the period 2023/24 and 2024/25.
- 5.2 REPF can be invested into eligible rural areas only as defined by DEFRA and which can be determined through application of the [Magic Map](#). The investment of REPF in 2023/24 represents 25% of the programme budget with the remaining 75% allocated for investment in 2024/25.
- 5.3 Table 6 shows investment to date and planned work for the final year of the programme. The Community and Business Capital Grant schemes have been established within Year 1 of the programme and delivery of these will continue across to the final year.
- 5.4 To ensure full programme risk mitigation the grant schemes detailed in Table 6 are subject to regular review meetings to monitor demand and adjust delivery techniques. Within 2024/25 this process will continue and is supported by the West Norfolk SPF Programme Board. Within the final year of the programme, if demand slows intervention rates of grant programmes will be reviewed and adjusted to ensure that local delivery is maximised

Table 6: Summary of REPF Investment 2023-25

RURAL COMMUNITIES: April 2023 – March 2025		Delivery method	2023/24	2024/25	TOTAL
E7	Active travel enhancements in the local area				
	2023/24 (approved via Officer Delegated Decision 28 November 2023)	Partnership with Norfolk County Council plus direct delivery	£75,000		
	<ul style="list-style-type: none"> Norfolk Coastal Path Interpretation Project Rural Cycle path waymarker audit 				
	2024/25 for approval				
	<ul style="list-style-type: none"> Priority footpath improvements, initial allocations include the B1145 from hospital roundabout to Mintlyn crematorium and West Acre boardwalk, subject to NCC delivery schedules. Community cycle storage grants. Cycle paths waymarker improvements (following outcome of audit in 23/24). 			£225,000	
					<u>£300,000</u>
E9 / E11	West Norfolk Rural Community Capital Grants				
	2023/24 West Norfolk Rural Community Capital Grant Scheme (approved via Cabinet report Feb 23)	Administered by Norfolk Community Foundation	£57,166		
	<ul style="list-style-type: none"> Supports impactful volunteering by the purchase of equipment or improvements to premises. 75% intervention rate, Grants up to £10,000. Total budget £75,000: £57,166 committed, balance transferred to 2024/25 scheme. 				
	2024/25 West Norfolk Rural Community Capital Grant Scheme (approved via Cabinet report Feb 23)				
	<ul style="list-style-type: none"> Investment in capacity building and infrastructure for civil society and community groups 75% intervention rate, Grants from £10,000 - £50,000 *Total includes carry forward from 2023/24 budget 			£242,834*	
					<u>£300,000</u>
	Subtotal Rural Communities		<u>£132,166</u>	<u>£467,834</u>	<u>£600,000</u>

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RURAL BUSINESSES: April 2023 – March 2025		Delivery method	2023/24	2024/25	TOTAL
E17	West Norfolk Rural Business Capital Grants				
2 Year Scheme: West Norfolk Rural Business Capital Grants (approved via Cabinet report Feb 23)		Administered by Norfolk Growth Hub			
<ul style="list-style-type: none"> 50% intervention rate, Grants from £10,000 - £100,000 					
<ul style="list-style-type: none"> Investing in micro and small rural enterprises 			£124,114	£372,341	<u>£496,455</u>
<ul style="list-style-type: none"> Developing and promoting the rural visitor economy 			£100,000	£300,000	<u>£400,000</u>
Subtotal Rural Businesses			<u>£224,114</u>	<u>£672,341</u>	<u>£896,455</u>
Total REPF Programme			£356,280	£1,140,177	£1,496,455

6. 2024/25 Programme Delivery Arrangements

6.1 UKSPF

6.1.1 Delivery partners for each UKSPF project are identified in Table 4. These partnerships have been established within the first two years of programme delivery and will continue to deliver the common goal underpinned by the [UKSPF Prospectus](#).

6.1.2 The Go Green project and the Communities & Place and People & Skills Project Call will provide opportunities for further partnership work with other organisations and businesses to enable the wider delivery of prosperity funding investment across the borough. Project development and funding awards will be subject to procurement rules and legal agreements, the structure for which has been established within the programme already through the direct involvement of the Borough Council's Legal Department.

6.2 REPF

6.2.1 The active travel enhancements priorities for 2024/25 have been developed with Norfolk County Council as the highways authority and dedicated team for active travel, trails and public rights of way. Priority projects have been identified that specifically benefit West Norfolk from the emerging Norfolk wide [Local Cycling & Walking Infrastructure](#) Plan (LCWIP) which are deliverable within the funding timeframe. Delivery of these improvement works are dependent upon NCC Highway's programme of works and regular meetings are held with Norfolk County Council to monitor this process and mitigate any risks. This will continue for 2024/25. Additionally, local schemes to deliver grant awards to towns and parishes to improve cycle storage facilities across rural communities will be directly delivered by the borough council with Norfolk County Council support.

6.2.2 The delivery of the West Norfolk Rural Community & Business Capital Grant Schemes will continue to be delivered as in 2023/24 in partnership with Norfolk Community Foundation (community grants) and New Anglia Local Enterprise Partnership (business grants). The process of establishing interest in grant awards for 2024/25 has been ongoing alongside year 1 delivery with both partners. Agreements and funding in place to support this third party delivery was summarised within the February 2023 cabinet report for the period 2023/24 – 2024/25.

7 Financial Implications

7.1 There is currently no indicated opportunity to defer any UKSPF or REPF programme investment beyond the funding deadline of 31 March 2025 and the Department for Levelling Up Housing and Communities have advised that any underspends in the final year of the programme (2024/25) will need to be repaid. Post March 2025, future Shared Prosperity Funding is proposed to be administered by Norfolk County Council under the Devolution deal for Norfolk.

7.2 Recommendation 3 of this report will enable budget decision processes to be delegated to the Assistant Director for Regeneration, Housing and Place to mitigate programme delivery risks that may arise within the final year and ensure timely decisions to maintain delivery within the funding timeframe. The indicative funding allocations against each intervention area in Tables 4 and 6 are subject to some level of movement as project plans develop and approval

is sought to facilitate programme adjustments to maintain spending targets and achieve fulfilment of local investment intentions. This recommendation incorporates all adjustments which can be undertaken within the approved budget, in alignment with the investment priorities set out in section 2, and in adherence with the programme framework as set out in Tables 4 and 6.

- 7.3 The process of programme adjustments will be reviewed by the West Norfolk Prosperity Funding Programme Board which comprises of senior officers and meets bi-monthly. Incorporating this delegated process will minimise administrative delays which could impact on the ability to spend in full by 31 March 25 and result in clawback of funding.

8. Monitoring & Governance Updates

- 8.1 As details in the February 2023 cabinet report, a governance arrangement to oversee the UKSPF delivery is currently in operation:



- 8.2 The proposals for UKSPF and REPF investment for 2024/25 were set out as part of a comprehensive annual Shared Prosperity Funding Programme update to the [West Norfolk SPF Partnership Group on 13 November 2023](#). This group includes a diverse range of local and regional stakeholders, institutions, employer bodies and organisations, as prescribed by government in the UK SPF Prospectus. The group was broadly supportive of the investments undertaken to date with appreciation provided for successful partnership working and stakeholder engagement, the breadth of projects included within the programme, the support invested to continue successful local schemes and opportunities opened for community grants. Discussions regarding proposals for 2024/25 were also supported, with reference given to continuation of the Boost project and for the need for an early project call to provide an opportunity for projects seeking match funding to add value to the local programme. Enhanced partnership working with the VCSE sector was highlighted as an opportunity to increase community opportunities, and ensuring a programme which creates circular support, including support for quality employment provision to underpin the success of skills provision and training schemes was agreed as fundamental to local economic growth. The importance of widespread promotion of grant schemes and project calls was noted and will be carefully managed into 2024/25.

- 8.3 Project monitoring processes have been established to provide clear qualitative and quantitative analysis of outcomes and outputs achieved by the local delivery of the UKSPF & REPF investment, compared with the indicated targets set out in the WNIP and REPF addendum. These are requested and reported quarterly as per DLUHC monitoring requirements. Projects will continue to be monitored through this established cycle within 2023/24. This will allow regular review of project progress against planned outcomes, outputs, and spending profiles as agreed within grant offer letters and Service Level Agreements.

9. Risk

Risk	Risk Implications and Mitigation	Level of Risk
SPF allocation not fully committed by 31 March 2025	<p>Risk Delivery of agreed priorities in by 31 March 2025 not achieved.</p> <p>Consequences Unspent funding subject to clawback</p> <p>Mitigation Recommendation 3: facilitate sound risk mitigation to ensure that allocations can be adjusted within the parameters of agreed investment.</p>	Low
Project Call not fully committed to	<p>Risk The Council has committed to spend the full funding allocation in accordance with the spending profile set out by government.</p> <p>Consequences/Mitigation Insufficient project establishment and support to implement and deliver the WNIP in 2024/25 leads to inability to spend the allocation and the funding is lost.</p> <p>Ensure wide promotion of project call. Use of experienced third-party provider's expertise and existing networks to establish and deliver projects applying specialist support to expediate delivery.</p>	Low
Stakeholder Support	<p>Risk Stakeholders do not support the priorities identified for 2024/25</p> <p>Consequences/Mitigation 2024/25 investment does not reflect the needs of the local area and deliver the required outputs/outcomes or meet the objectives of the SPF due to lack of stakeholder support.</p> <p>A West Norfolk SPF Partnership Group meeting was held 13 November 2023 to provide an update on UKSPF and REPF programmes to date and plans for 2024/25. The Group was supportive of the proposals and provided suggestions on successful final year delivery which will be taken on board as part of implementation.</p>	Low

9. Environmental Considerations

- 9.1 The SPF framework, WNIP & REPF priorities specifically includes interventions which supports the government's clean growth policies. One of the target outputs that will be monitored through programme delivery includes 'supporting decarbonisation.'

10. Policy & Personnel Implications

10.1 The priorities identified in the WNIP, UKSPF project and REPF priorities align with the Council's corporate strategy specifically with regard to;

- Promote growth and prosperity to benefit West Norfolk
- Protect our environment
- Support our communities

10.2 The WNIP is also aligned with the following strategies and policies for West Norfolk;

- King's Lynn Town Investment Plan
- King's Lynn Local Cycling & Walking Infrastructure Plan
- Climate Change Action Plan

Appendices

Appendix 1: Monitoring and Evaluation Summary of UKSPF projects funded in 23/24

Background Papers

[UK Shared Prosperity Fund Prospectus](#)

[Rural England Prosperity Fund Prospectus](#)

[Cabinet Report: 31.10.23 UKSPF 24/25 – Continuation and Expansion of Boost Project and West Norfolk Training Grants](#)

[Cabinet Report: 07.02.23 WEST NORFOLK INVESTMENT PLAN \(UK SHARED PROSPERITY FUND\) AND RURAL ENGLAND PROSPERITY FUNDING – PROGRAMME PRIORITIES](#)

[Cabinet Report: 21.07.22 WNIP Shared Prosperity Fund](#)

[West Norfolk Prosperity Funding Partnership Group papers November 2023](#)

[West Norfolk Investment Plan, August 2022](#)

[West Norfolk Rural Addendum](#)

**Pre-Screening Equality Impact
Assessment**

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



Name of policy/service/function	Regeneration & Economic Development				
Is this a new or existing policy/service/function?	Existing				
Brief summary/description of the main aims of the policy/service/function being screened. Please state if this policy/service is rigidly constrained by statutory obligations	Delivery of the Shared Prosperity Fund and REPF to support the identified priorities in the West Norfolk Investment Plan and the Rural Addendum. N/a				
Question	Answer				
<p>1. Is there any reason to believe that the policy/service/function could have a specific impact on people from one or more of the following groups according to their different protected characteristic, for example, because they have particular needs, experiences, issues or priorities or in terms of ability to access the service?</p> <p>Please tick the relevant box for each group.</p> <p>NB. Equality neutral means no negative impact on any group.</p>		Positive	Negative	Neutral	Unsure
	Age		√		
	Disability	√			
	Gender		√		
	Gender Re-assignment		√		
	Marriage/civil partnership		√		
	Pregnancy & maternity		√		
	Race		√		
	Religion or belief		√		
	Sexual orientation		√		
Other (eg low income)	√				

APPENDIX 1: UKSPF Continuation Projects: Monitoring and Evaluation Summaries as at the end of Quarter 2 2023/24

The Place Pop Up Shop and Business Hub

UKSPF Grant award 2022/23	£1,063.95
UKSPF Grant award 2023/24	£31,049.20
UKSPF Grant request 2024/25	£37,764.00
Total project request from UKSPF	£69,877.15

What support do businesses / individuals receive when they hire The Place?

Every business receives 1:1 support from the minute they enquire about making a booking. The amount of time spent with a business will vary on need / personality / experience but often entails providing information and suggestions about hire options via email or face to face. On their first visit we will help the business to set up and will make suggestions about layout and display. This discussion usually leads to signposting the business on to other businesses in King's Lynn for marketing and branding advice, including design and printing. As we get to know the business, we will continue to refer them to others for advice / information, for example to an accountant to talk about business structures, or solicitors for legal advice. We will make suggestions about their social media presence, and how they can get more from being at The Place.

We refer some clients onto the BIPC, as well as to Menta / NWES. At least 2 businesses have engaged in a BIPC programme.

Support is on-going, even for those businesses who have been using The Place regularly over the last 12 months. Most recently we arranged for an experienced retail manager in the town centre to talk to businesses about visual merchandising and how to improve and change the display and layout of their products to gain more sales.

The Place Quarter 1 23/24: Achievements

We have re-launched The Place and have been preparing new publicity materials include a short film and clips that will be used next quarter on social media, including TikTok. We hope this form of media will have a greater impact and reach, particularly to young entrepreneurs.

We have seen a steady stream of inquiries, in particular in response to some social media posts. Conversion of inquiries could be stronger and we will look into this as we move into the next quarter.

9 Events hosted. We have seen an increase in the demand for use by community related events, these include awareness raising campaigns (Lily), activities to encourage engagement and participation (KL Town Band, Tapping Hospice, Police, NHS) and free, family friendly events. We have more coming up in the next quarter relating to KL Festival, Pride, summer holiday activities and a roadshow on behalf of Anglian Water.

We have hosted a regular pop up on a Thursday, with new traders joining for some sessions, we also support a regular sewing class on a Tuesday evening.

In April we hosted a free TikTok workshop for local businesses.

Quarter 2 23/24: Achievements

We have hosted a number of events during this quarter, notably a series of free, family activities over the summer holidays which attracted large numbers of children and adults. Pop up usage has increased, as have level of enquiries for use as a pop up as well as hot desking. There seems to be a preference amongst hirers to share the space with others, rather than hire the space to create their own pop up. We think this has a lot to do with confidence, and the desire to connect and collaborate. For example we have started to host a regular group of businesses one day a week.

Quarter 3 23/24: Plans

We will continue to do more of the same, increasing our marketing and social media to attract new users. We anticipate a busier quarter as the period leads up to Christmas.

THE PLACE OUTPUTS & OUTCOMES 23-24 as at 30 Sep 23

Number of enterprises receiving non-financial support					Number of local events or activities supported					Number of potential entrepreneurs provided assistance to be enterprise ready				
Target 23-24	Q1	Q2	Q3	Q4	Target 23-24	Q1	Q2	Q3	Q4	Target 23-24	Q1	Q2	Q3	Q4
79	35	13			2	9	3			10	2	4		
Increased number of enterprises supported					Number of People Reached									
Target 23-24	Q1	Q2	Q3	Q4	Target 23-24	Q1	Q2	Q3	Q4					
40	7	9			0		22							

Note: Q1 achievements include outputs and outcomes recorded for March 2023.

How The Place defines / counts / records outcomes

Entrepreneurs: All hirers are asked to complete a booking form which requests information about their business or business idea, we ask whether they are registered as business or sole trader. Where they state that they are not registered, we count this individual as a potential entrepreneur.

An increase in number of enterprises supported: This outcome relates to new bookings, i.e. when a business who has not used The Place before follows through with a booking. They will be registered as a business, rather than being identified as an entrepreneur / not yet registered. We know that they are new to us as each business / individual completes a booking form and provides us with proof of their public liability insurance. We have counted new bookings, as businesses new to The Place from the start of our SPF grant in March 2023.

The Place Project proposal for 2024/25

To continue to provide a multi-purpose, accessible and flexible space that can be used to deliver an accessible, affordable and attractive space to hire for small businesses and entrepreneurs to promote and sell their services and products.

To provide users of the space with support and guidance, signposting them to appropriate business support services, local business services and, where appropriate create learning and development opportunities within The Place for them to access.

Provide hot desking, collaborative opportunities and meeting space for sole traders, home workers, visiting business people, charities, groups and businesses within the Borough of King's Lynn and West Norfolk.

Host events and activities that animate the town, promote public information messages, and encourage engagement and community spirit.

Creation of a part time post which will be 50% funded by King's Lynn BID. This post is essential to provide more, and more consistent support to users, whichever outcome they fall into. This will include organising more sessions with people who have skills and experience in relevant areas, like visual merchandising, or digital marketing, customer service etc. This would also facilitate capacity to be more proactive and follow up discussions with CWA and Springwood to get young entrepreneurs to use the space.

Currently The Place is run on a very minimal budget with admin and maintenance often picked up outside working hours. This post would give extra capacity to do more and better.

Whole project expenditure: (please list items)	2022/23	2023/24	2024/25 Proposed	
	REVENUE	REVENUE	REVENUE	TOTAL
Energy costs	900.00	12500.00	12,000	£13,400.00
Broadband	43.95	601.20	661	£645.15
Display screen rental	87.00	1044.00	1148.5	£1,131.00
Sanitary bin supply	13.00	156.00	172	£169.00
window cleaning	10.00	120.00	120	£130.00
cleaning materials	10.00	270.00	270	£280.00
waste recycling contract	0.00	612.00	612	£612.00
marketing for launch	0.00	500.00		£500.00
insurance	0.00	1391.00		£1,391.00
marketing	0.00	1900.00	2000	£1,900.00
maintenance and servicing	0.00	700.00	1500	£700.00
licences	0.00	255.00	280	£255.00
rent	0.00	11000.00	15,000	£11,000.00
Business Support Assistant			4,000	
TOTAL REVENUE COST	1,063.95	31,049.20	37,764	£32,113.15

Business support assistant 16hr pw post: match funded by KL BID £8,000 against a total projected post cost of £12,000

THE PLACE OUTPUTS & OUTCOMES FORECAST 24-25

Number of local events or activities supported	20
Number of organisations receiving non-financial support	100
Number of potential entrepreneurs provided assistance to be enterprise ready	15
Number of people reached	40

Go Digital

UKSPF Grant award 2022/23	£19,312.50
UKSPF Grant award 2023/24	£37,000
UKSPF Grant request 2024/25	£18,500
Total project request from UKSPF	£74,812.50

Note: 2024/25 budget will be match funded with £18,500 from Norfolk County Council

Go Digital funding programme

Free digital business support available for small and medium sized businesses in Norfolk to learn how to better use digital tools to identify business opportunities and help businesses to grow.

Business owners and managers can apply and will be matched with a digital adviser and get expert advice on:

- How to best sell your products online
- How to use social media to reach new customers
- How to attract new visitors to your website
- How different digital tools can benefit your business
- The best homeworking options for your team
- Your adviser will do a complete digital audit of your business and produce a comprehensive report with findings and recommendations.

Business owners and managers can also apply for a grant of up to £500 to help implement a digital action plan. Applications are on a first come first served basis.

Go Digital OUTPUTS & OUTCOMES 23-24 as at 30 Sep 23

Number of enterprises receiving non-financial support					Number of organisations receiving grants				
Target 23-24	Q1	Q2	Q3	Q4	Target 23-24	Q1	Q2	Q3	Q4
65	16	9			56	6	6		

Notes: 2022/23 targets are included within 2023/24, Q1 achievements include outputs and outcomes recorded for March 2023.

Go Digital OUTPUTS & OUTCOMES FORECAST 24-25

Number of enterprises receiving non-financial support		Number of organisations receiving grants	
Target 24-25		Target 24-25	
40		36	

Notes: 2024/25 targets include match funding of £18,500 from Norfolk County Council.

Go Digital Project Performance Dashboard For KLWN



KLWN

2022/23 | 2023/24

Advice Spaces
Grant Spaces

25
20

20
18

Advice Stage Progress

GOL's Sent

25

20

Complete

20

5

Work in Progress

5

15

Spaces Left

0

0

Budget Spend

£9000 / £9000

£4950 / £9000

Grant Stage Progress

Complete

9

3

Work in Progress

6

0

Spaces Left

5

15

Budget Spend

£7493.34 / £10000

£1500 / £10000

New Anglia Growth Hub

The New Anglia Growth Hub Proposal 2023/24 and 2024/25

New Anglia LEP, with delivery partners Suffolk Chamber of Commerce and Suffolk County Council, proposes to continue to deliver a range of comprehensive business support services for the Borough Council of King's Lynn and West Norfolk for 2024/25. The Programme of business support delivered for West Norfolk in 2023/24 comprises:

- 1) The New Anglia Growth Hub
- 2) Scale Up New Anglia
- 3) Connected Innovation Programme
- 4) Small Grants scheme

A review of delivery and targeting is due in mid-December 2023, to enable adjustments in service delivery to suit the local need going forwards.

Growth Hub with Scale Up

- A team of business advisors who provide free, fully funded, impartial support and advice for businesses who have been trading for over 12 months.
- Targeted support through one-to-one engagement proactively engaging companies who would benefit from support in high level innovation, productivity programmes, supply chain development and Scale Up – with on-going long-term engagement.
- Provide one to many support, open to all businesses across the LEP area, through a range of events which provide advice on topics all businesses need e.g. net zero, low level innovation, workforce progression, health and wellbeing.
- Support to applicants seeking funding from LEP grant schemes.
- Signpost clients to wider local and national business support interventions including financial programmes.
- Provide 'tailored to district's requirements' access to the LEP's New Anglia CRM System, where business interactions are recorded to facilitate targeted support, and access to reports of business support activity in district areas. The CRM System will provide the required monitoring and reporting for delivery of UKSPF and REPF activity. The CRM is Norfolk and Suffolk's largest business database with over 14,000 interactive business records.
- Provide access to FAME which draws on company house data to allow the interrogation of full scope of business activity on a district level and track it over time. The tool is used for due diligence and complements the CRM.
- Provide business with access to Scale Up New Anglia, a bespoke scheme designed to provide support to accelerate the growth of participant businesses, in order to help boost their growth, turnover and profit.

Connected Innovation

Collaboration

- Drive collaboration between innovation hubs and clusters, with a focus around cross sector innovation, business support and addressing key agendas such as clean growth across Suffolk and Norfolk leading to new innovative activity.
- Support the innovation hubs and wider business access wider business and innovation support schemes. E.g. Growth Through Innovation Grant, Innovation Grant Mentoring Project. With the aim to secure innovation investment which in the past has been low.
- Bring together 25 Innovation centres and clusters from across Norfolk and Suffolk enabling collaboration and knowledge transfer. There is opportunity to grow the network.
- Developing the peer network for all innovation centres and clusters across Norfolk and Suffolk to encourage connectivity and collaboration.
- Provide direct connections and introductions to Innovation support agencies and programmes e.g. UKRI Innovate UK Edge, Catapults, KTN, Innovation Grant Mentoring Programme, universities etc to support local SMEs.

Events

- Deliver an events programme (consisting of 20 events in total across the two years in partnership with the hubs) including challenge led sessions focussed on identifying collaborative opportunities and new technologies to identify solutions. Bringing together businesses, academia and national agencies e.g. Catapults.
- Encourage new pilot project activity leveraging the technology strengths in each local cluster. Encourage and promote new co-working or innovation spaces within local districts to help support start-ups / entrepreneurial ecosystem.

Online Portal / Website

- Provide an on-line portal which will bring together all information on innovation across the region, to house information on innovation programmes, research, funding, investment, events calendar, networking opportunities and case studies. Due to be live Autumn 2023.

Growth, Funding and Investment

- Research and map technologies strengths and capabilities across the hubs and identify opportunities for collaboration and promotion to attract new tenants and inward investors.
- Support businesses with attracting private investment and identifying Government funding support.

West Norfolk Specific Activity

- Specific strategic support to West Norfolk in the development of business cases for innovation and enterprises related business cases. Support cluster development through range of networking events at West Norfolk venues.

Small Grant Scheme

- Provide capital grants from £2,500 to £25,000 to support business growth, investment in R&D or innovation, and projects that result in improved productivity.
- Support provided at a 25% intervention rate.

Outputs and Outcomes

The following outputs and outcomes will be delivered by the LEP and its partners in King's Lynn and West Norfolk.

	2023/24	2024/25	Total
Number of businesses receiving non-financial support	75	101	176
Number of businesses engaged in Scale Up	15	20	35
Indicative hours of support to established businesses	226	302	528
Number of jobs created	4	5	9
Number of grants awarded	9	9	18
Increased number of enterprises supported			10%
Value of grants awarded (funding from the LEP)	£75,468	£89,126	£164,594
Value of grant private sector match funding	£226,404	£267,378	£493,782
Increased amount of investment	£301,872	£356.504	£658,376

THE GROWTH HUB OUTPUTS & OUTCOMES 23-24 as at 30 Sep 23.

Number of enterprises receiving non-financial support					Number of organisations receiving grants					Jobs created as a result of support (fte)				
Target 23-24	Q1	Q2	Q3	Q4	Target 23-24	Q1	Q2	Q3	Q4	Target 23-24	Q1	Q2	Q3	Q4
75		30			9					4				
Increased number of enterprises supported (Scale Up)					Increased amount of Investment									
Target 23-24	Q1	Q2	Q3	Q4	Target 23-24	Q1	Q2	Q3	Q4					
15					301,872									

Note: Delivery commenced at start of Q2 2023/4

Through the services provided, West Norfolk businesses will also be able to access, via the Growth Hub, other LEP funded programmes including the Business Transition to Net Zero

fund grant scheme, Growth Through Innovation (GTI) grant scheme, Growing Places Fund loan fund and the New Anglia Capital Angel Investment Fund.

Business Support Funding Profile: King's Lynn and West Norfolk

UKSPF	23/24	24/25	Total
West Norfolk UKSPF	£128,220	£145,312	£273,532
New Anglia LEP	£75,468	£89,126	£164,594
Total Funding	£196,584	£241,542	£438,126

St George's Guildhall Activity Programme & Events Coordinator

UKSPF Grant award 2022/23	£5,000
UKSPF Grant award 2023/24	£30,000
UKSPF Grant request 2024/25	£30,000
Total project request from UKSPF	£65,000

Note: 2023/24 budget match funded with £12,500 from Norfolk & Norwich Festival Bridge

OUTPUTS & OUTCOMES 23-24 as at 30 Sep 23

Number of local events or activities supported					Number of volunteering opportunities supported				
Target 23-24	Q1	Q2	Q3	Q4	Target 23-24	Q1	Q2	Q3	Q4
15		12			15		9		
Increased footfall (numerical value)					Jobs created as a result of support (FTE)				
Target 23-24	Q1	Q2	Q3	Q4	Target 23-24	Q1	Q2	Q3	Q4
500		*			1		1		

12 Events or Activities Supported: 9 School Holiday activities, 1 Art exhibition, 1 Weekend family event (Shakespeare's Birthday Big Bash), Volunteer Talks.

9 Volunteering opportunities supported: Volunteer opportunities at school holiday events.

* Increased Footfall: We are still compiling this data, however we know our footfall has seen an increase - for example, our numbers at the Heritage Open Day (supported by UKSPF funding) saw an increase of over 1100 people attending the event this year.

1 fte Job created as a result of support: Activities Coordinator employed September 23 for the development and delivery of the Guildhall events activity plan.

Evaluation of 9 School Holiday events:

Wednesdays - Family Fun at St George's Guildhall

Attendance total 191 across 4 events

- 79% of participants scored the sessions at 18/20 or above.
- 39% giving us full marks 20/20.
- 56% had not been to the Guildhall before.
- Social media, mostly Facebook was the most popular way of hearing about the events. Posters and flyers scored the lowest.
- When asked what future events they would like to attend, the most popular were family activity sessions and themed event days. These were closely followed by drama club and family theatre productions.
- The majority of children attended local schools which received the social media advertising tile via email.
- 12% were home-educated and a couple were visiting the area.
- The majority of participants lived in the PE30 – PE34 postcodes.
- All sessions were attended, with the morning sessions being fully booked each Wednesday.

Thursdays – Youth workshop session: Play in a Day

Attendance total 27 across 3 events - Spaces were limited to 10 young people per session.

- 12 new young people joined us in 2023 for Play in a Day, and many of these booked further sessions after attending the first one.
- 1 young person returned from 2022.
- Most participants were from the PE30 – PE32 post code.
- Play for a Day specific evaluations were all positive and the responses consistently said the best part was “performing the play” and they enjoyed “working with new people”, which for many was a new thing.
- The comments about what they would tell their friends were all positive with recommendations that their friends should come and join the sessions; it was fun.
- The final question on the Play in a Day evaluation comments asked for any improvements, with one suggestion: “Maybe have more opportunities to practise the play and receive constructive criticism e.g. to face the audience when speaking”.

REPORT TO CABINET

Open (exempt appendices)		Would any decisions proposed :			
Any especially affected Wards	Discretionary /	Be entirely within Cabinet's powers to decide		YES/NO	
		Need to be recommendations to Council		YES/NO	
		Is it a Key Decision		YES/NO	
Lead Member: Cllr Beales E-mail: <i>cllr.alistair.beales@west-norfolk.gov.uk</i>		Other Cabinet Members consulted: Leader, Deputy Leader, Finance Portfolio Holder			
		Other Members consulted: Cabinet			
Lead Officer: David Ousby E-mail: <i>david.ousby@west-norfolk.gov.uk</i> Direct Dial:01553 616505		Other Officers consulted: Executive Directors, Chief Executive, Monitoring Officer, S151 Officer			
Financial Implications YES/NO	Policy/ Personnel Implications YES/NO	Statutory Implications YES/NO	Equal Impact Assessment YES/NO If YES: Pre-screening/ Full Assessment	Risk Management Implications YES/NO	Environmental Considerations YES/NO
If not for publication, the paragraph(s) of Schedule 12A of the 1972 Local Government Act considered to justify that is (are) paragraph(s) 3 and 5					

Date of meeting: 15th January 2024

COUNCIL COMPANY FUNDING – WEST NORFOLK PROPERTY LIMITED (WNPL) AND WEST NORFOLK HOUSING COMPANY LIMITED (WNHC)

Summary

This paper needs to resolve the current position as follows:

1. Properties leased from the Council to the companies need to be offered for transfer (sale) into the companies freehold (subject to Company Board agreement);
2. New and clear funding criteria needs to be in place to support the transfer and to meet governance requirements

Recommendation

Cabinet Resolves:

1. To note the contents of the Report setting out (i) the advice of Grant Thornton, PS Tax, Link Group Treasury Services and Ensor Accountants relating to the structure options for financial support to WNPL and WNHC (the Companies), and (ii) the Council's current analysis as regards the best options;
2. To offer a Drawdown facility to the Companies (comprising a mix of loan facilities and repayable grant agreements, and which may include debt-equity arrangements and/or the extension of current lease arrangements), with an overall lending cap of £50 million;
3. To give delegated authority to the Executive Director (Place), in consultation with the Portfolio Holder for Business, the Section 151 Officer

and the Monitoring Officer, to agree the final terms of the Drawdown facility with the Companies.

Recommendations to Full Council:

4. To give delegated authority to the Section 151 Officer in consultation with the Portfolio Holder for Business to amend the Capital Strategy for 2023-2024 to reflect the approved Drawdown facility to the Companies.

Reason for Decision

1. To deliver on Council Corporate Objectives:
 - Promote growth and prosperity to benefit West Norfolk;
 - Protect our environment;
 - Efficient and effective delivery of our services; and,
 - Support our communities.
2. To deliver affordable and private rented housing for acquisition by the council's wholly owned housing companies to support the delivery of council corporate objectives.

1. Executive Summary

This paper brings together the advice the council has received from legal, financial and tax advisors on the funding of the council housing companies. It sets out:

1. The total amount of borrowing available that the council can provide to support the housing companies, and the details of the funding agreements between the council and the companies.
2. the financing arrangements for West Norfolk Housing Company Limited (WNHC), which expired in March 2023, to allow that company to continue to purchase properties, both from the councils Major Housing Programme (MHP) and elsewhere.
3. the options available to the council to allow West Norfolk Property Limited (WNPL) to manage the private rented (PRS) properties in its portfolio, and the future pipeline of properties being delivered through the councils Major Housing Programme (MHP), through a hybrid debt plus equity financing and lease extension provision

The report and its recommendations have been reviewed by external consultants Grant Thornton. Their findings have been incorporated in this report to Cabinet.

2. Background

2.1. West Norfolk Property Limited (WNPL)

WNPL was incorporated in April 2018 and was set up to acquire properties from the Borough Council of King's Lynn and West Norfolk (the Council), to let for private rent to residents of the Borough. In January 2019, Cabinet approved the business plan for WNPL, including the principle of retaining for private rent 20% of the homes developed by the Council on sites of more than 50 dwellings through the Development Management Agreement with Lovell Partnerships Limited. Delegated authority was also given to agree the financing arrangements for the freehold transfer of the properties from the Council to WNPL.

The details of the financing arrangements were not resolved prior to the first stock being transferred to WNPL. To facilitate the transfer of properties into the company, in September 2020 a lease agreement for the term of 4 years based on 70% of gross rent until such time as the loan agreement was agreed between the council and the company. The first PRS properties were leased to WNPL in November 2020, with a total of 27 PRS properties joining the portfolio from November 2020 to April 2021.

Managing agents (Touchstone) and legal services (Howes Percival) for the company were procured in 2021, and a Service Level Agreement (SLA) between the council and the company was also agreed.

Between June 2022 and June 2023, a further 47 PRS properties from the council's Nora 4 (Nar Valley Park) development were leased to the company. One of the original 27 properties was transferred at open market value to West Norfolk Housing Company in 2023 to provide accommodation funded

through the Local Authority Housing Fund. The number of properties in the portfolio is currently 74 dwellings. This is planned to increase to 139 dwellings, with 46 being delivered on Florence Fields (Parkway) with a further 19 on Lynnsport 1.

Item	Number of units	OMV (A)	Build costs	Proposed Loan value (B)	LTV (B/A)
Existing portfolio	74	£15.8m	£12.3m	£14.1m	89%
Parkway (20% PRS)	46	£8.8m	£7.9m	£7.9m	90%
Lynnsport 1	19	£4.5m	£4.0m	£4.1m	92%
Total	139	£29.1m	£25.9m	£24.2m	

Table 1 – WNPL portfolio information

The performance of the portfolio is reported through a KPI dashboard, which summarises key metrics including rent collected, voids, bad debts and management and maintenance costs. The gross to net revenue ratio is around 16.5%. In addition to the management and maintenance costs, the company is charged for services provided by the council through the SLA (approx. £54k per annum).

2.2. West Norfolk Housing Company (WNHC)

WNHC was incorporated in 2016 and set up to increase capacity in the social housing sector to deliver new affordable housing in the Borough and to provide a vehicle to help meet the Council's priorities particularly in relation to accommodation for homeless households. It was registered as a not-for-profit Registered Provider of Social Housing in 2018.

The Company has acquired 47 affordable homes to date (35 rent and 12 shared ownership). The Company also leases 7 flats from the council at 37 Broad Street which are used to help meet the Council's statutory homelessness duties to provide temporary accommodation.

The company's properties are managed and maintained by Broadland Housing Association under a mix of leases and management contracts.

To date, the principal way in which the Company has acquired new affordable homes has been through debt finance provided by the Council with loans of £3.2m currently outstanding. The company's £10m loan facility with the Council expired in March 2023. The increase in the Bank of England Base Rate had meant that the interest rate of 4.5% above the Bank of England base rate, with the interest rate for each drawdown fixed at the time of each drawdown, was no longer financially viable for the company when acquiring new stock.

This has meant that the Company has had to make alternative temporary arrangements to acquire units on the NORA 4 developments including agreeing to defer payment on several units.

The company is due to acquire an additional 73 homes from the Council up until 2026-27. The estimated value of these homes is circa £7.9m

The Company acquires S106 affordable housing units based on the capitalised income from the properties minus costs such as management and maintenance. This is typically around 50% of open market value. This is the standard methodology for valuing S106 units in the affordable housing market and reflects that the homes are secured as affordable housing in perpetuity.

The price offered by West Norfolk Housing Company is benchmarked against other affordable housing transactions and data held by the council.

The Company may be able to obtain grant funding from Homes England to deliver additional affordable housing both on the Council's developments and elsewhere. This funding would only be available where the affordable housing is not a requirement of planning policy. Discussions with Homes England regarding access to grant funding are ongoing.

3. Prudential Borrowing – The Prudential Code

Section 2 of The Local Authorities (Capital Finance and Accounting) (England) Regulations 2003 requires Local Authorities to have regard to the Prudential Code when complying with the duty under section 3 of the Local Government Act 2003 – the duty to keep under review how much it can afford to borrow.

The finance team in the council has reviewed the current Capital Programme and advised that the “maximum” borrowing limit for external debt for the council is £64.5m. Referred to as the Operational Boundary, in CIPFA guidance, this is the limit for external borrowing, with the exception that headroom for a further £5m exists in the “Authorised Limit”, but that is intended for very short-term borrowing such as overdrafts for cashflow purposes.

As outlined in the Council Budget and MTFs (Medium Term Financial Strategy) currently the council has £10m of external debt finance taken out in 2007 through Barclays Bank at a fixed rate of 3.81% which is fixed for 70 years and due to expire in 2077.

Therefore, the Council effectively has £54.5m of potential external debt financing available before it meets its Prudential Borrowing ‘ceiling’ as determined in accordance with statute and guidance by the s.151 statutory officer.

The council is budgeted to have £3.497m for capital expenditure in earmarked reserves as at 31 March 2024 and so will look to balance any capital requirement using a mix of reserves and borrowing from external markets to support the capital programme requirement. This means that it is possible that not all of the ‘drawdown facility’ will be required from external finance. This balance will be managed in accordance with the Treasury Management

Strategy and in liaising with the s151 officer (AD Resources) to ensure that this is held within acceptable limits.

The S151 officer, as statutory officer, has advised that the maximum prudential lending facility for Housing Companies is £50m. For illustration, this could be made up as follows:

- West Norfolk Housing Company (WNHC) - £14m
- West Norfolk Property Limited (WNPL) - £36m

This would leave £8m capital available for other requirements (for example, enterprise zone infrastructure and other capital programme development costs).

3.1. Advice on Loans to Companies – Lending Criteria

External advice has been taken regarding the lending criteria that the Council should use when acting as lender to companies. This advice was used as the basis for the lending criteria set out below, which has been further refined following advice from consultants Grant Thornton.

The preferred approach would be for the companies to acquire the freehold interest in their respective properties outright, as per the business plans. This is possible for WNHC, but is difficult for WNPL, principally due to the current interest rates.

3.2. Basis for a Loan Facility

The council is advised that the principles governing the basis for determining the interest that should be charged by the council to the companies are the EU Reference Base Rate, and the Subsidy Control (Gross Cash Amount and Gross Cash Equivalent) Regulations 2022).

- 1) EU Reference Base Rate. This is based on an initial reference rate as set under European Commission legislation. Additionally, where a company has limited or no credit history, the interest rate should be increased by 400 base points and where the loan exceeds 1 year, a further 2 base points should be added to reflect the additional administration required. This results in an interest charge to the company of 9.11% made up as follows (at 30 September 2023):
 - State aid reference rate – 5.09%
 - Limited credit history – 4.00%
 - Loan beyond 1 year – 0.02%
- 2) The Subsidy Control (Gross Cash Amount and Gross Cash Equivalent) Regulations 2022. These regulations set out the requirements for determining an interest rate on a loan that might reasonably have been expected to be available on the market. It sets a base rate according

to the length of the loan and then looks at the creditworthiness of a company as rated between satisfactory to strong. There are 3 levels of satisfactory to consider based on the level of risk of loss in the event of a default on the loan. Applying this results in an interest charge to the company of 6.5% which is made up as follows:

- Length of Loan @ 25 years – 3.1%
- Creditworthiness as satisfactory with loss in the event of default as more than 60% or not known – 3.4%

When considering the above options, it has been recommended that the Subsidy Control Regulations are preferable to the EU Reference Base Rate as the Competition Markets Authority would not regard the latter as a determinative in their decisions on this issue. However, it should be noted that the Subsidy Control Regulations were written when the Bank of England (BoE) interest rate was set at 3% and there is no mechanism in the legislation to track against BoE base rate which is now 5.25%. It is also noted that the length of loan only goes up to 25 years and the calculated loan rate of 6.5% provides less than 1% margin against the PWLB loan rate of 5.63% which does not allow sufficient risk margin for the council (see section 3.6 for the council's proposal to build a risk reserve).

Taking all of the above into consideration, the following sets out the recommendation for a suitable basis for a loan facility to the companies which would be to use the higher of the following:

- The loan rate as set out in the Subsidy Control (Gross Cash Amount and Gross Cash Equivalent) Regulations 2022 (currently maximum of 6.5%); or
- PWLB rate plus 2% (currently 7.63%)

This would mean that the council is covering its position in applying the Subsidy Control Regulations but also allowing for a margin against PWLB rates so the council can set aside an amount in a risk reserve. It also allows some flexibility for the loan rate to reduce as interest rates fall or to adopt the Subsidy Control rate at such time when it is appropriate to do so in line with a fall in BoE base rate which is currently forecast to reduce to 2.5% in 2027. It is also recommended that the loan facility allows for a review of the creditworthiness of the companies when the servicing of their loan arrangements are more established and they can take advantage of a lower mark-up rate.

3.3. Prevailing Economic Conditions

The most recent Bank of England Monetary Policy Report (November 2023) found that:

- Maintaining higher interest rates are working to reduce inflation;
- Inflation has fallen and is expected to fall further this year and next;
- Interest rates will be kept high enough for long enough to get inflation back to the 2% target

It is to be expected therefore that interest rates will remain at the current level until inflation begins to fall in line with the current BoE outlook (table 1 below)

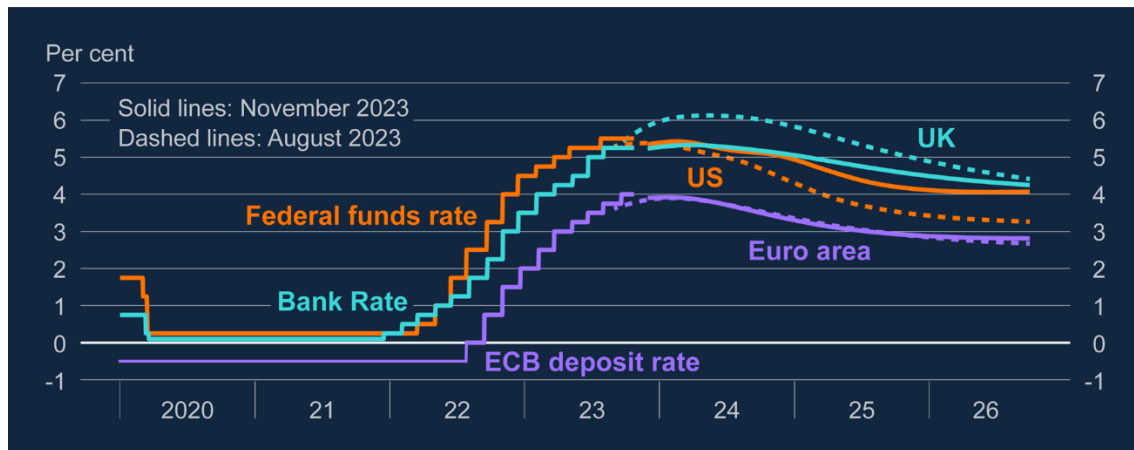


Figure 1- Interest rates are at or close to the peak of their market-implied paths in the US, euro area and UK (source: BoE, November 2023)

3.4. Tax Considerations

HMRC typically expects the most restricting ratio to be applied for the purpose of calculating an arm’s length interest expense for UK transfer pricing purposes. This is traditionally the interest cover ratio for real estate investments.

We highlight that higher interest rates and higher Loan to Value and Loan to Cost (LTVs, LTCs) can be observed in the market, however the application of these LTVs and interest rates may increase the risk of challenge by HMRC given their expectation on applying the most restricting ratio (the interest cover ratio).

Should higher LTVs, LTCs and interest rates be applied, then the interest expense on the excess will need to be disallowed in UK tax returns, subject to the findings of the detailed analysis.

Borrowers are required to have evidence that their interest deduction is considered arm’s length. There is typically more than one arm’s length price and typically there is a range of prices that can be considered arm’s length. It is recommended that the council undertake a detailed thin capitalisation review based on the options it is considering in order to assess the arm’s length nature of the resulting interest deduction of these options. The selected option to determine the level of debt and interest expense that can be considered both arm’s length and aligned with the Council’s strategic and commercial objectives.

In future periods, the council is required to reassess whether the position achieved each year is still in compliance with the findings of the thin capitalisation study.

3.5. Drawdown Facility and Lending Criteria

As part of this the lending criteria for loans to companies will include:

- Loans will be available for up to 90% LTV (or at 100% LTC, where this is less than 90% of OMV);

- Subject to review of the Business Plan of the company and suitable plan re: affordability & repayment to ensure that cash-flow allows for the company to remain sustainable over the long term (10 years) and meeting its repayment requirements. The business plan should also outline an acceptable 'exit plan' in order to meet its obligations;
- The Council will place a charge against the properties in relation to the loan as security for up to the full market value of the properties;
- Funding will only be available for where the Council has a controlling interest in the Company;
- The interest charged and conditions for the loans will differ depending on the situation of the companies, risk and where the activities of the company meet key objectives of the Council (e.g., homelessness), notwithstanding other conditions set out in this paper (i.e., sustainability). An illustrative outline is provided below for WNHC and WNPL;
- Interest will be at the prevailing rate obtained by the Council plus a 'risk-premium' as advised;
- The Council reserves the right to withdraw future funding through the facility.

3.6. Risk Reserve

The council will hold a 'risk reserve' based on a percentage of the income generated through the interest rate differential between the Council and the Company i.e., between the % charged to the Companies and the interest rate paid by the council on borrowing. The % and total fund required to be defined by the S151 Officer. This will be held to manage the risk around the uncertainty in the market in the short to medium term and support the Council/ shareholder to help mitigate some of the risks.

3.7. Overall Flows of Finance for Lending

The diagram below sets out the relationships between the housing companies, the councils borrowing and the funding facility between the council and the companies.

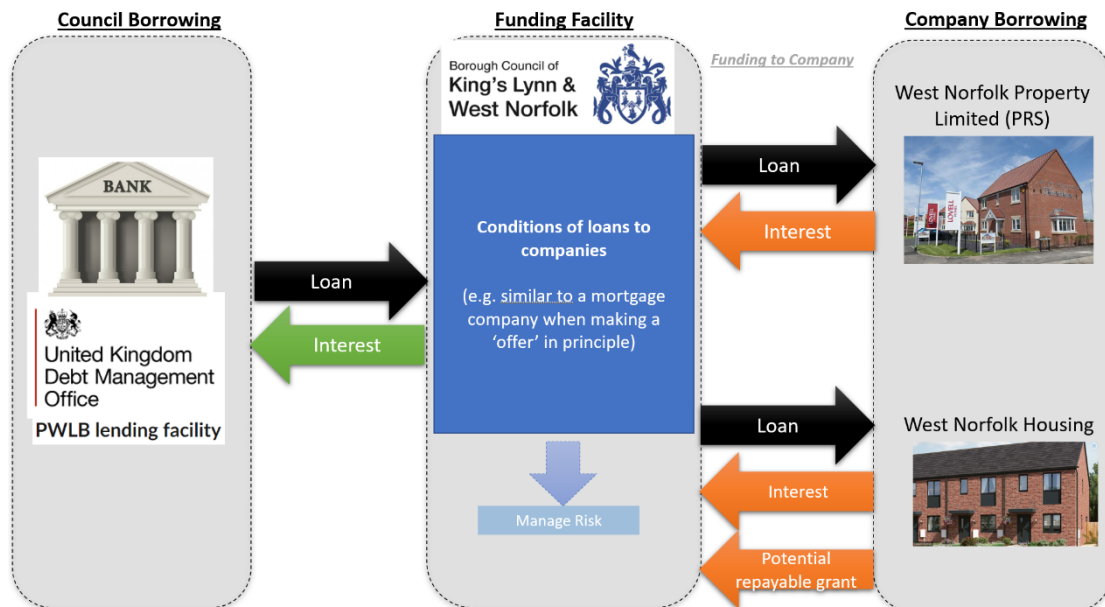


Figure 2 - illustrative outline of funding arrangements

3.8. Affordability to the Companies

The funding solution must be structured to ensure that it meets the requirements of both the Council and the Companies, recognising there will be a cost of borrowing to the Council for providing the support to the Companies and a need to demonstrate value for money.

From a Company perspective the funding solution will need to be financially sustainable and structured to be the most tax efficient. The table below sets out the critical success factors.

Table 2 – Success factors of the funding solution

BCKLWN	WNPL/ WNHC
<ul style="list-style-type: none"> The Council will need to cover the borrowing costs associated with the funding provided. The Council wishes to hold a risk reserve to manage risk of uncertainties in the market conditions to mitigate the risks to Council 	<p>WNPL</p> <ul style="list-style-type: none"> Revenues generated from PRS need to be sufficient to meet debt costs Tax efficiency of funding solution <p>WNHC</p> <ul style="list-style-type: none"> Revenues generated from affordable rents sufficient to meet debt costs

4. Companies Funding Requirements

The assumptions applied by the Council on the cost of borrowing are; an interest rate of 7.5% p.a. from 2023, reducing to 5.0% p.a. in 2027.

The 7.5% p.a. interest rate is calculated based on a PWLB rate of 5.5% p.a., plus an additional 2.0% p.a. to recognise the element of risk associated with the proposed financing.

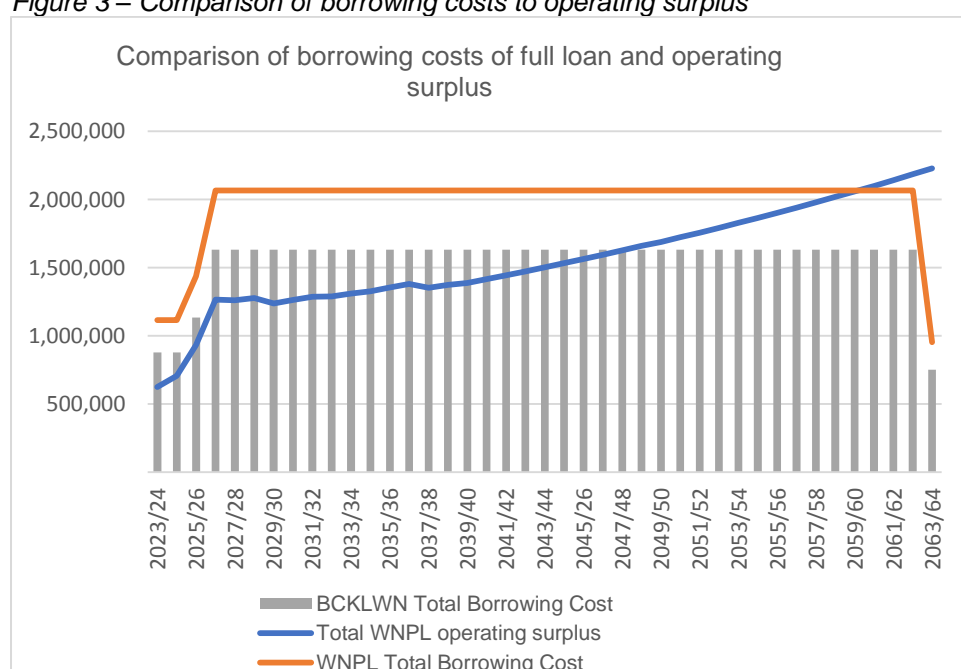
The funding requirements for both housing companies have been modelled by officers and reviewed by Grant Thornton. The summary findings are as

follows:

WNPL

The financial modelling undertaken for WNPL demonstrates that the costs associated with the borrowing are unaffordable for the Council in the short- to medium-term. At current interest rates, the purchase of the freehold is unaffordable up to 2045, where there is a deficit between WNPL’s forecast operating surplus and the Council’s interest costs. Given the impact of forecast inflation, from this point onwards the operating surplus exceeds the borrowing costs - therefore the overall proposal across the 60-year appraisal presents a forecast where the total operating surpluses are sufficient to meet interest costs. This is shown in the graph below.

Figure 3 – Comparison of borrowing costs to operating surplus



The table below sets out the position for WNPL based on the forecasts shared by the Council (using the Parkway 20% PRS scenario alongside the base case and Lynnsport1 positions).

Table 3 - WNPL funding arrangement

WNPL	Apr-23	Apr-24	Apr-25	Apr-26	Apr-27	Apr-28	Apr-29	Apr-30
BCKLWN annual PWLB interest payment (£m)	n/a	0.78	0.83	1.39	1.53	1.54	1.55	1.56
Total WNPL operating surplus (£m)	0.63	0.71	0.93	1.27	1.26	1.28	1.24	1.26
Difference (£m)	0.63	(0.07)	0.10	(0.12)	(0.27)	(0.27)	(0.31)	(0.30)

As shown above, the operating surplus of WNPL is exceeded by the BCKLWN borrowing costs in every year from the borrowing inception date apart from April 2025.

The following options have been considered:

1. reduce the debt servicing cost through:
 - (a) a lower level of debt (e.g., increasing the equity contributions)

- (b) structure some form of interest/capital repayment holiday in the early periods
- 2. extend the lease period until interest rates are more favourable
 - (a) lease extension
 - (b) lease extension with option to purchase at a later date
- 3. seek to adjust the operating cashflow that the units generate (e.g., charge higher rents).

RECOMMENDATION For WNPL

A hybrid of Option 1 and 2 between the debt plus equity option 1a and the lease extension option 2a. is recommend at the present time for WNPL.

WNHC

The forecast cashflow modelling for WNHC demonstrates the proposed funding arrangement is affordable, considering the base case assumptions presented.

Table 4 - WNHC funding arrangement

WNHC	Apr-23	Apr-24	Apr-25	Apr-26	Apr-27	Apr-28	Apr-29	Apr-30
WNHC Borrowing costs (£m)	0.13	0.23	0.40	0.51	0.56	0.56	0.56	0.55
Total WNHC operating surplus (£m)	0.13	0.25	0.44	0.55	0.60	0.62	0.64	0.66
Difference (£m)	0	0.02	0.04	0.04	0.04	0.06	0.09	0.11

The Council is planning to provide funding through a combination of grant, in the form of a repayable grant (as a 0% p.a. interest loan), and loans at an appropriate interest rate to WNHC, in order to support the acquisition of properties at the total required value.

The table below sets out the overall Council position once the current pipeline of acquisitions is completed in April 2027 (i.e., the mature position), noting that £3.2m already has loan repayments in place which will leave an outstanding balance to be serviced of £7.9m.

Table 5 - Council position in April 2027

Council	Apr-27
Total Borrowing drawn and outstanding from the PWLB (£m)	7.900
Council interest cost payable at a 5.5% p.a. interest rate (£m)	0.435
Council interest income receivable from WNHC (£m) in April 27	0.560
Surplus to the Council (£m)	0.125

As the table demonstrates, the Council will have a buffer of £125,000 which is the excess of the interest receivable once the Council make its interest payments back to PWLB. Please note that WNHC is a company limited by guarantee and hence cannot pay dividends.

RECOMMENDATION For WNHC

It is proposed that the Council provides WNHC with 2 separate facilities:

- A loan facility equal to circa 70% of the company's total funding requirement. This facility should include flexibility for the company to take out

interest only or repayment loans at fixed or variable rates as long as defined covenants set by the Council are complied with.

- A repayable grant facility equal to circa 30% of the total funding requirement
-

5. Policy Implications

The long term funding of WNPL to manage private rented properties allows the council to intervene in the private rented market and set a high standard for the quality of housing and management with longer term family friendly tenancies.

Similarly, the investment in WNHC ensures that the Council has a vehicle to deliver affordable housing in the borough and meet the Council's housing priorities.

6. Financial Implications

Rent income and capital values will increase over time, whilst borrowing costs are fixed (based on maturity loans).

The financial implications for the council are that it will have a commitment to borrow capital to finance the housing company portfolios for the longer term, thereby restricting capital available for investment in other areas. The risk is mitigated by the extent to which the companies are able to dispose of properties (or portfolios) on the open market, with WNPL able to dispose of the portfolio either as investments or with vacant possession, at open market values.

For WNHC, the funding agreement the liquidity of the portfolio (the ability to dispose of the properties) is limited by the Existing Use Value (EUJ) of the properties as affordable rented or shared ownership homes.

7. Personnel Implications

The WNPL portfolio is managed via agents (Touchstone), and an SLA exists to recover council staff costs.

The WNHC portfolio is predominantly leased to Broadland Housing Association – due to expire in March 2029 - and an SLA exists to recover council staff costs.

8. Environmental Considerations

The high standard of homes acquired by the housing companies from the MHP sites ensures the portfolio will contribute towards net zero for the council with low running costs for tenants due to high EPC ratings, ensuring less disposable income required on household energy bills and therefore less stress on affording rental payments.

9. Statutory Considerations

Latest HM Treasury guidance is that they will support the use of PWLB finance by wholly owned council housing companies where the council has set up a housing strategy to address housing shortages in its area.¹

9.1. Subsidy Control (previously State Aid)

The Council will be disposing of the properties under section 123 Local Government Act 1972, which generally provides that a local authority may dispose of land in any manner it wishes. Under the General Disposal Consent (England) 2003 local authorities can dispose of land for less than best consideration, on condition that the undervalue does not exceed two million pounds, and where the authority considers that this will contribute to the promotion or improvement of economic, social or environmental well-being in its area.

The Council has received external advice around the UK Subsidy Control requirements that relate to the proposed financing. A summary of that advice is set out below.

WNPL

WNPL is a company whose business is set up to act commercially by providing private rented sector housing. The company is set up to return a profit to its shareholder: the Council. It is considered that providing a subsidy to a company such as this will detrimentally interfere with the market in which it operates, i.e. the private rented sector. The Council has no intention of making such a subsidy available to other companies or individuals that are in similar circumstances to WNPL. Accordingly, the finance provided to WNPL by the Council must remain on market terms so that it is not deemed a subsidy.

WNHC

Since the facility element for WNHC is not on market terms and is used for financing the development of social housing, this will be deemed a subsidy to which the rules governing assistance for services of public economic interest would apply. This is the same position as the grant element that is to be provided to WNHC.

We have therefore undertaken an assessment of the WNHC facility and grant elements against the relevant principles within UK Subsidy Control legislation, with these being subsidy control compliant if the Council details the clear case for a policy-led intervention in local housing provision. Also, since the grant element provided to WNHC exceeds £100,000, the Department for Business and Trade must be notified of the subsidy, within the overall context of the support provided to WNHC by the Council

¹ PWLB Guidance to Applicants, HM Treasury, June 2023

10. Equality Impact Assessment (EIA)

(Pre-screening report attached)

11. Risk Management Implications

Table 6 Risk items	Risk Implications and Sensitivity	Level of Risk
Market values fall	<p>Risk In terms of market values, these are anticipated to fall by 11% in 2023, with an overall growth of 3% in the 5 years to 2027. Within the Major Housing Programme, there are 32 properties due to complete in May 2024 at Southend Road Hunstanton, 6 of these are affordable homes for WNHC. There are no PRS properties on this scheme, and no other properties of any tenure due to complete before the end of 2024.</p> <p>Sensitivity/Consequences The sales valuations are based on current market values, which are due to fall in the near term but recover in the medium term.</p>	Medium
Market values fail to increase as expected	<p>Risk The anticipated growth over the 5 years to 2027 does not materialise- property prices either stagnate or fall in real terms</p> <p>Sensitivity/Consequences Housing markets are cyclical, but demand for housing remains strong. The council will retain the option of disposing of properties into the private rented market to mitigate this risk.</p>	Low
Higher than anticipated interest rates	<p>Risk Mortgage interest and PWLB rates continue to increase</p> <p>Sensitivity/Consequences Markets are currently pricing BoE holding the base rate at 5.25% with no further increases anticipated, and rates remaining at this level until core inflation is seen to fall within acceptable parameters. Base rates have a direct impact on PWLB rates.</p>	Low
Borrowing requirement to fund the development phase	<p>Risk Council is required to use PWLB borrowing to support the development of the scheme, and to fund the purchase of properties for the wholly owned companies.</p> <p>Sensitivity/Consequences PWLB rates are considered to be at the peak of the cycle. The risk can be mitigated by the council borrowing at short term rates from other local authorities, at rates generally below current PWLB. Over the longer term the options for borrowing are:</p> <ol style="list-style-type: none"> 1. Public Works Loan Board (PWLB) between 1-50 years. This can be based on interest only or have some form of repayment of the principle. An application form is submitted and generally the funding is received in 5 days. 2. Pension funds will also lend to local authorities. These are typically used on a forward funding basis and helps to manage risk if the council knows that there is a need to borrow in future and knows how much is required. The forward interest rate curve will be used to assess the applicable rate to be charged. Currently there are no interest rate reductions built into the curve to reflect any downturn in future interest rates so there is currently no benefit in looking at this option, but it could be considered in a year's time as the position is likely to change once inflation comes down and stabilises. Typical entry level is £30m which does not have to be in one loan payment. This can 	Low

Table 6 Risk items	Risk Implications and Sensitivity	Level of Risk
	<p>be drawn down in tranches over time. The arrangements tend to be on an annuity basis as these organisations tend to buy long dated gilts. They will look at the credit rating of a local authority and many local authorities do not have one. Those that do will have paid to have their rating. There is also a tendency to use Moody's metrics to assess the rating of a LA and these organisations will carry out their own due diligence and they will determine the pricing according to their own assessment. A local authority can borrow from PWLB at gilt plus 80 basis points so they will benchmark against that based on the authorities position so it is a fairly subjective approach that is undertaken. It is also worth noting that there are no recent transactions evident in the market since early 2022 as authorities are holding back and using short term solutions.</p> <p>3. Bonds – The council could not issue in our own name as these are in general around £200m plus. The council would need its own credit rating which can cost circa £40k and it is unlikely that the council would get any better terms than PWLB at the moment.</p> <p>4. UK Municipal Bond Agency – activity has gone quiet. The last report issued stated that they were not able to compete with PWLB. However, they would want more assurance and would drill down into more detail to ensure the council's business case stacks up and the loan can be repaid. Due to the issue of more and more local authorities in headlines for the wrong reasons, this has the potential to add more risk to pricing based on previous experience.</p>	

12. Declarations of Interest / Dispensations Granted

13. Background Papers

(Definition : Unpublished work relied on to a material extent in preparing the report that disclose facts or matters on which the report or an important part of the report is based. A copy of all background papers must be supplied to Democratic Services with the report for publishing with the agenda)

Anthony Collins legal advice

Pre-Screening Equality Impact Assessment

Borough Council of
King's Lynn & West Norfolk



Name of policy/service/function	Housing Companies				
Is this a new or existing policy/service/function?	New / Existing (delete as appropriate)				
Brief summary/description of the main aims of the policy/service/function being screened.	COUNCIL COMPANY FUNDING – WEST NORFOLK PROPERTY LIMITED (WNPL) AND WEST NORFOLK HOUSING COMPANY LIMITED (WNHC)				
Please state if this policy/service is rigidly constrained by statutory obligations	N/A				
Question	Answer				
<p>1. Is there any reason to believe that the policy/service/function could have a specific impact on people from one or more of the following groups according to their different protected characteristic, for example, because they have particular needs, experiences, issues or priorities or in terms of ability to access the service?</p> <p>Please tick the relevant box for each group.</p> <p>NB. Equality neutral means no negative impact on any group.</p>		Positive	Negative	Neutral	Unsure
	Age			x	
	Disability			x	
	Gender			x	
	Gender Re-assignment			x	
	Marriage/civil partnership			x	
	Pregnancy & maternity			x	
	Race			x	
	Religion or belief			x	
	Sexual orientation			x	
	Other (e.g., low income)			x	

Appendix 1

Reports from Link, PS Tax and Ensor Included here

Appendix 2

WNPL business plan

Appendix 3

WNHC business plan

Appendix 4

Grant Thornton report

Document is Restricted

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of the Local Government Act 1972.

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